

<u>IN A COMPLAINT UNDER THE BERN CONVENTION 2022/6</u>	
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BETWEEN:

BALKANKA ASSOCIATION Sofia

COSIGNATORY

and

SERBIAN GOVERNMENT

RESPONDENT

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**WITNESS STATEMENT OF DIMITER KOUMANOV**

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**I, DIMITER KOUMANOV, of SOFIA, BULGARIA, BALKANKA ASSOCIATION, SOFIA BULGARIA, will say as follows:**

**1.1. "*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 the Balkan rivers.

**1.2. Where appropriate, represented by:**  
**Dipl.eng. Dimiter Koumanov**, member of the board

**1.3. Nationality:**  
Bulgarian

**1.4. Address:**  
XXX

**1.5. Town:** Sofia

**1.6. Post code:** XXX

**1.7. Country:** Bulgaria

**1.8. Mobile telephone:**  
XXX

**1. I make this statement in support of the above complaint. The facts stated within this statement are within my own knowledge and belief save where otherwise stated.**

**2. I work as (normal occupation):** *civil engineer - structural designer*

**3. EXPLAIN RELATIONSHIP TO CASE EG I AM A MEMBER OF x FISHING SOCIETY, number of members etc, any relevant info re the fishing society.**

*Currently Balkanka has 44 members, mostly fishermen and volunteers*

**4. EXPLAIN HOW LONG BEEN FISHING, KNOWLEDGE OF FISH, WHERE FISHES, HOW OFTEN.**

*I've been fishing on a regular basis - at least once a week - all my life since 1968 when I was six years old. In the last 20 years most of the fishing trips were in the trout zone and the knowledge of fish and its behaviour is second to none. I have been doing this all my life.*

**5. Explain where located in relation to mine -**

*in the town of Sofia, Bulgaria, but I have visited the area of the Karamanichka River under the Podvirovi mine by invitation of the local people on more than five occasions*

*The Karamanichka river, which is made up of streams that pass from the mine and next to the mine, is in the Brankovačka river basin. It is then around 30 km from the mine to the place where the Brankovačka River flows into Dragovištica river which then goes into the Aegean sea basin*

**6. Explain that you noticed the absence of fish on X date. Give details of how many fish of this type would normally see. Any other relevant information**

*There is no life in the Karamanichka River, while it is normal for such a river to host some 200 - 300 Balkan trout species per kilometre.*

It is stated in Professor Simonovic's study: RISKS TO STOCKS OF NATIVE TROUT OF THE GENUS SALMO (ACTINOPTERYGII: SALMONIFORMES: SALMONIDAE) OF SERBIA AND MANAGEMENT FOR THEIR RECOVERY in the introductory passage:

*Marić et al. (2004) reported for the first time the occurrence of Macedonian trout, Salmo macedonicus (Karaman, 1924), as a native species in tributaries of the Dragovištica River (i.e., Struma River drainage area of the Aegean Sea basin)*

*My First visit was back in the autumn of 2018 and I never tried to catch a fish in this river, because it is so poisoned that flies don't even fly over the water and there was no benthos under the stones in the upper section of the river. This is the normal check up for the presence of fish in the river.*

*The results of my first visit and other information for the area of Bosilegrad are thoroughly described here:*

[https://dams.reki.bg/uploads/Docs/Files/ESPOO\\_COMMITTEE\\_COMPLAINT\\_BOSILEGRAD.pdf](https://dams.reki.bg/uploads/Docs/Files/ESPOO_COMMITTEE_COMPLAINT_BOSILEGRAD.pdf)

<b>Statement of truth:</b>
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I believe that the facts stated in this witness statement are true.
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Signed:

(Dimitar Koumanov)

Dated: 30.01.2024