

**INITIATIVE GROUP
OF PUBLIC MOVEMENTS AND POLITICAL PARTIES
«CLEAN CITY»**

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**To the President of the
«International league for the
defense of human dignity and
security», Hero of the Soviet
Union, General of the Army**

V.I. VARENNIKOV

Russia, 119180, Moscow,
ul. Bolshaya Yakimanka, 12

Dear Valentin Ivanovich!

We, the inhabitants of the Tuapse city - “City of Military Glory”, members of the initiative group “Clean City”, know you as a state and public figure, an unbiased, principled man and a defender of human dignity and security. We ask for your support with solving the problems of the critical environmental situation in the city and the continuous increase of anthropogenic impact on its residential area.

Currently, 23 thousand residents (over a third of the inhabitants of the Tuapse city) reside in the territories which, in fact, are considered as disorganized sanitary protection zones of environmentally harmful and hazardous enterprises of an oil refinery complex which currently undergoes a reconstruction which will result in a threefold capacity increase, near Tuapse trading port and other surrounding businesses that pollute the environment adversely. Under current law, all people residing in these sanitary protection zones should be immediately relocated.

In the past 5 years more than 104 thousand tons of pollutants have been emitted in the atmosphere of the city annually: 89 thousand tons coming from transit and local road transport and another 15 thousand tons from stationary sources, which totals to 1630 kg per capita, including infants. Despite that, permits for the expansion of old and construction of new industrial and transportation companies that carry additional harmful impact on the city of Tuapse are still being issued, without considering existing

hazardous enterprises, which created an unsatisfactory living environment for its residents. There is no comprehensive approach to these issues, because so far the city has no ecological passport, which creates conditions for legal violations and disregard for the requirements of Article 42 of the Constitution of Russian Federation and Article 35 of the Federal Law № 122 of 22.08.2004 (“On Environmental Protection”).

Public protests are growing in the city of Tuapse and Tuapse region against the expansion and construction of the following environmentally hazardous industrial and transport projects in the city:

- Bulk terminal “Eurochem” for storage and export transshipping of fertilizers;
- Terminal for the storage and export handling of liquid hydrocarbons and liquefied gas;
- Grain terminal for storage and handling of grain;
- Deep-sea oil-loading wharf capable of receiving tankers with deadweight up to 150 thousand tons for export load of oil and oil products.

The reason for this was the current increased anthropogenic impact on natural ecosystems, resulting in deteriorating conditions in the city. A city with a population of 64 thousand people is located at the bottom of a large natural bowl and surrounded on three sides by high ridges of the Great Caucasus Range and clamped in a valley between the rivers Tuapse and Pauk. Within the city, industrial enterprises are located on both sides of the river Tuapse.

Two large and exceptionally explosive enterprises are located practically in the centre of the city: «Oil Company Rosneft - Tuapse NPZ» LLC (refinery) and «RN-Tuapsenefteproduct» (tank farm), surrounded by other equally hazardous enterprises - Gorgaz with a gas storage; gas refueling station (AZGS); oxygen gas filling station; oil storages of the “Oilbase District Chernomortransneft” JSC; concrete products plant (JBI), which emits cement dust into the atmosphere; Tuapse railway marshalling yard which hosts several trains simultaneously, each of those carrying thousands of tons of petroleum products. Reconstruction of the refinery has been started in order to increase the refining volumes from 4 to 12 million tons a year. The enterprise is planning to widen the assortment of finished products, including petrochemicals (light oil, sulfur, etc). **As a result, the Tuapse refinery will become the largest petrochemical company located in the middle of a resort town in southern Russia.**

Highly explosive potential of the petroleum complex increases with each passing day. Because of the reconstruction of «Oil Company Rosneft - Tuapse NPZ», in addition to the existing tank farm with a total volume of more than 500 thousand tons of simultaneous storage of oil and petroleum products, several more 50-ton tanks are being installed at a distance of less than 100 meters from residential buildings. Despite that, a construction of a terminal for handling 5 million tons of LNG per year is planned within 50 meters of the existing «RN-Tuapsenefteproduct» tank farm.

Discharge quay for «RN-Tuapsenefteproduct» petroleum products is located in close proximity to the passenger platforms of Tuapse station, near the central city market and a shopping center.

One source of pollution is the Tuapse trade seaport with a turnover of more than 20 million tons per year. Transshipment of environment-polluting goods (coal, grain,

fertilizers, sugar) from open air dry cargo berths lead to severe excesses in the concentration of organic and chemical substances: 16 - 25 times the maximum permissible discharge (MPD) according to BOD, suspended solids – 33 - 42 times. At the same time, a significant amount of harmful substances such as coal, sugar and grain dust, the dust of mineral fertilizers and heavy metals (zinc, iron, copper) gets into the air and seawater. Emission of toxic substances (hydrogen sulfide, hydrocarbons) into the atmosphere when loading tankers exceeds the maximum permissible concentration (MPC) 2 - 9 times because of the lack of coastal systems of collection and recuperation of vapors of oil and petroleum products.

A zone of soil and groundwater contamination with oil and petroleum products - a so-called "oil lens" - has formed at the Tuapse river mouth and the vast adjacent area, causing the pollution of the sea. In 2007 an emergency has been declared in the Tuapse city because of repeated ignition of the sea due to high concentrations of oil around the oil berths of the port. In late February 2007 L.P. Yarmak, the deputy chief of the North Caucasian department of the Federal service for technical and environmental monitoring warned the management of all enterprises that the city cannot afford to increase man-triggered impact until the problem with the oil lens is solved.

In its Report of 14.11.2003 on the audits of the «International parallel audit of the Bucharest Convention for the Protection of Black Sea against Pollution (Krasnodar Territory)», the Audit Chamber of Russian Federation states:

- «Intensive transshipment of oil and petroleum products, carried out in the ports of Novorossiysk and Tuapse also affects the quality of marine waters. The problem of protection against oil pollution in the territory of the Tuapse refinery and tank farm has not been solved yet. Underground lenses of oil products have formed on the said territory; an extensive zone of contamination of soil, groundwater and marine waters with petroleum products emerged. According to the data of the Krasnodar Territory Central Department of Natural Resources, the volume of one single lens is 200 thousand m³.

- «The most polluted air on the Black Sea coast is found in the cities of Novorossiysk and Tuapse».

- «The results of works on the aerial monitoring of pollution of waters and coastline of the Black Sea conducted in 2003 allowed the Special Center of monitoring to assess the situation of pollution of controlled waters as unfavorable; significant pollution of seawater with a layer of petroleum hydrocarbons was noted in particular. During the study of the open part of the water area in June 2003 it was discovered that one of the most significant places of contamination of marine waters with oil hydrocarbons was near the town of Tuapse, where fields of oil layer with an intensity of 2 points covering 30% of the Black Sea water area were observed».

The Governor of Krasnodar Territory A.N. Tkachev also expressed his concern about environmental problems of our city on his meeting with the people of Tuapse city and Tuapse region: «... I also want to mention an issue that literally does not let the thousands of residents of Tuapse breathe and live like human beings: the environmental condition. Devil-may-care attitude to this topic for decades has led to the fact that today there's almost more oil than seawater in the port area. Ignition of the sea surface has become commonplace. The air of the seaside city is also contaminated with coal dust and

oil fumes. All actions of the local authorities to protect the unique nature are a drop in the ocean. If we do not raise this problem bluntly - **tomorrow we get an environmental catastrophe. And the consequences will be irreversible ...**» («Tuapse news» newspaper № 146-147 from 28.07.2007, article «One formula for happiness for the two of us»).

The overloaded federal highway along the Black Sea coast of Caucasus towards Sochi, passing through Tuapse, contributes greatly to the pollution. Due to the large flow of vehicles traffic jams many hours long are commonplace. The total emission of pollutants from motor vehicles is about **90 thousand tons per year**.

Virtually all production areas of the above companies, including shore infrastructure, are located in the residential area. Required regulatory sanitary protection zone is not organized; the distance from pollution sources to residential areas is in fact barely 30 - 100 meters. Sanitary protection zones of multiple enterprises overlay.

Within 4 meters from the residential and shopping complex in the center of the city a delivery of various bulk cargoes in open gondola cars and on platforms of the railway line leading to the Tuapse trade seaport is going on.

Tunnels or pedestrian and road crossings have not yet been constructed, which creates obstacles to the emergency, technical services, fire trucks and ambulances, not to mention the people, when idle trains are blocking the way.

Many enterprises in the city belong to the class 1 and 2 of hazard and cause significant harm to the environment and human health. Our city ranks first in the Krasnodar region for oncology diseases; number of patients with blood diseases, endocrine and respiratory diseases increases year after year. Illnesses of children are particularly alarming.

Due to the current critical environmental situation the Tuapse public has repeatedly raised questions about the radical solution of existing problems at the rallies, meetings, summits with local deputies, union leaders, city administration, with visits and appeals to the State Duma of the Federal Assembly of RF (outgoing № 63 from 02.05.2008).

During a sociological survey of the population, over 11 thousand people have signed against the construction of a bulk terminal carried out by “Eurochem” company between the beach and the promenade (recreation area of the Tuapse residents). The initiative group “Clean City” has repeatedly directed the appeal to different institutions; moreover, it applied for a referendum against the construction of new dangerous and hazardous business twice, but the appeal has been wrongfully denied.

Ignoring the warning of the deputy chief of the North Caucasian department of the Federal service for technical and environmental monitoring L.P. Yarmak, the enterprises illegally continue increasing the industrial impact on the city. Construction works of new industrial terminals (grain, dry bulk for the handling of fertilizers, export for the transshipment of liquefied hydrocarbons and an oil berth) are started. Establishment of a large additional transshipment terminal will certainly lead to increased industrial pressure on the city.

The city of Tuapse still has no environmental passport; there is no unified sanitary-protective zone either. Using this, federal and territorial services issue permissions to the new businesses without treating them systemically and without assessing the environmental impact of industrial and transport enterprises of the city as a whole.

Requirements of the residents of Tuapse to improve the environmental situation in the city are expressed in the resolution of the public protest rally against the construction of the bulk terminal for handling fertilizers of the “Eurochem” company in the city of Tuapse held on 09.02.2008.

Despite the relevance of the questions and the direct orders of the Executive Office of the Russian Government (out. № P12-7064 from 05.03.2008), no appropriate responses corresponding to the interests of the inhabitants of the city of Tuapse have been received from the RTN, Russian Ministry of Natural Resources, from the Tuapse city council deputies and the administration of municipal formation city of Tuapse.

In the reply from the Krasnodar Territory department of Rospotrebnadzor (Federal service on customers’ rights protection and human well-being surveillance) it is said that after the examination of materials presented by “Tuapse Bulk Terminal” LLC in October 2007 by the Krasnodar Territorial Division of Rospotrebnadzor in Tuapse city in the Tuapse region, a sanitary-epidemiological conclusion № **39-pr** was issued on 11.10.2007 «... **about unsuitability of land for the construction of bulk terminal due to the discrepancy with previously reviewed submissions**» (outgoing № 01-4/3882 of 03.04.2008). The same is confirmed by Rospotrebnadzor (out. № 01/2839-8-16 of 31.03.2008) and the Department for emergency and state environmental monitoring of Krasnodar Territory (out. № 68-835/08-01.11 of 07.04.2008). Despite that, the construction of a dock for this terminal is being carried out in full swing since January 2008.

In connection with the foregoing, we kindly ask you to stand up for the rights and lawful interests of Russian citizens residing in the town of Tuapse, and help to:

1) organize, essentially with an involvement of the public, a conduction of an independent comprehensive assessment of the industrial and transport enterprises - both existing and those proposed for expansion and construction, including terminals, checking their compliance with sanitary rules and norms of sanitary protection zones in relation to the current critical environmental situation in the city;

2) immediately review in the Russian Government the problem of the lack of an ecological passport of the Tuapse “City of Military Glory”, as Tuapse is within the area of the Bucharest Convention «On the protection of the Black Sea from pollution» of 21.04.1992, ratified by the order of the Supreme Soviet of Russian Federation № 5614-1 from 12.08.1993;

3) ask the Prime Minister and the President of RF to consider the removal of all environmentally hazardous industrial facilities and the withdrawal of transit vehicles outside the city of Tuapse, followed by land rehabilitation and construction of a new modern residential complex with social infrastructure on the liberated areas. One of the possible solutions to these problems, proposed at a meeting on 09.02.2008, is the implementation of the non-state investment YACONTO Integrated Program of federal and national significance.

Set of documents is attached to this appeal.

Respectfully yours,

on behalf of the initiative group:

Chairman of the initiative group
of public movements and political parties
«Clean City»,
Chairman of the public movement
«Committee of Tuapse women»
of Tuapse city and Tuapse region



E.P. Torgovkina

Deputy Chairman of the initiative group
of public movements and political parties
«Clean City»,
Deputy Chairman of the Council of
Veterans of war and labor of the railroad
transport of Tuapse end of the Krasnodar
branch of North Caucasus railroad

V.M. Vlasov

Secretary of the initiative group
of public movements and political parties
«Clean City», member of the public
movement «Committee of Tuapse women»
of Tuapse city and Tuapse region

A.F. False

(The Russian text of this letter is an original.)