

Bulgarian government is failing to propose reforms and measures for biodiversity, sustainable agriculture and low carbon economy. A lack of transparency and public dialogue casts a further shadow on the process.

Next to no public participation

With only one public hearing in November 2020, civil society in Bulgaria awaits the third version of the Bulgarian recovery and resilience plan. After the government presented the first draft at a large event last year, the second version was published at the beginning of February. Concrete proposals for reforms and measures to transform Bulgaria's carbon-intensive economy into one that respects the climate, biodiversity and innovation were ignored. The recent elections on 4 April further hindered the process as the government resigned without making clear the next steps.

The Recovery and Resilience Facility offers a chance for Bulgaria, the poorest country in the EU, to progress with its part of the European Green Deal. With a budget of slightly over BGN 12 billion, or about EUR 6 billion, the Bulgarian recovery plan consists of four pillars: Innovative Bulgaria, Green Bulgaria, Connected Bulgaria and Just Bulgaria. The 34 per cent of the Green Bulgaria pillar allotted to the Low Carbon Economy, Biodiversity and Sustainable Agriculture components makes a good impression at first glance. However, a detailed look uncovers inefficient and business-as-usual measures.

No energy decentralisation, no energy independence

More than 57 per cent of the Low Carbon Economy component is planned for energy efficiency, with a focus on measures for residential, business, state and municipal buildings. Although necessary, the priority given to this measure shows low ambition for a rigorous green transition. All other measures, such as energy-efficient municipal lighting, digital transformation and the development of information systems, low carbon gas infrastructure, pilot projects for green gas and biogas, were given insignificant allocations of the total budget for this component, making sure that transformational change will be highly unlikely.

Deepening biodiversity challenges with Natura 2000

The biodiversity component of the green pillar envisages the development of site-specific conservation objectives and measures for the Natura 2000 network. As the deadline for establishing the conservation objectives expired in 2014, work on this issue is long overdue, especially given the fact that the European Commission has already started an infringement procedure against Bulgaria on the topic.

Mapping and calculating the value of ecosystems, ecosystem services and green

infrastructure within the Natura 2000 network is the second type of activity within the biodiversity component. It poses the question how efficiently is EU money spent. Mapping of ecosystem services was included in the EU Biodiversity Strategy 2020. Territories outside the network were mapped, with no public information on the benefits of the exercise. However, it is no longer included in the new EU Biodiversity Strategy 2030. The monitoring under the Habitats and the Water Framework Directives could be used to provide some of the information needed. Most importantly, funds could be used for more practical and much needed biodiversity related measures.

In total, biodiversity-related measures amount to only 0.72 per cent of the green pillar, which misses by far the significant funds envisaged by the EU Biodiversity Strategy 2030 for investments in biodiversity and nature-based solutions.

Harmful measures might destroy wetlands

The Green Pillar Sustainable Agriculture component allocates almost 20 per cent for the rehabilitation of state-owned irrigation systems. The refurbishment of pumping facilities, which have been out of use for a long time now, might lead to the drainage of wetlands, causing damage. This measure has no appropriate assessment with the Natura 2000 sites, an obligatory procedure aiming to avoid such risks.

Furthermore, the measure is problematic from the point of view of good governance and efficiency: it is an investment without any reform. It is not in line with the strategic document on irrigation until 2030 which envisages an extensive reform programme with many legislative changes, none of which is carried out to date, in addition to the planned liquidation of the beneficiary, a 100 per cent state-owned company with low credibility. The current version of the Bulgarian national recovery and resilience plan also does not envisage planting a single tree.

The technical guidance on the application of 'do no significant harm' under the Recovery and Resilience Facility states that 'Complying with the applicable EU and national environmental law is a separate obligation'. Therefore, Strategic Environmental Assessment and Appropriate Assessment are necessary and the Commission as guardian of the EU law is expected to insist on it.

As the Regulation for the Recovery and Resilience Facility states: 'The Facility should support activities that fully respect the climate and environmental standards and priorities of the Union...'. We would therefore expect the national plan to support measures that are not covered by the operational programmes under the Multiannual Financial Framework 2021 - 2027 and which support the implementation of the EU Biodiversity Strategy 2030

and the Farm to Fork Strategy. In line with this thinking, Bulgarian NGOs have already proposed to the Ministry of Environment a list of measures that could be included in the recovery plan:

Increasing the share of strictly protected areas;

Connectivity between Natura 2000 sites;

River connectivity (removing unnecessary barriers, construction of fish passes);

Wetlands restoration in line with the measures of the river basin management plans and the National Plan for Conservation of the most important wetlands in Bulgaria 2013 - 2022;

Restoration of agricultural protection belts and riverine forests;

Capacity building in the structures of the Ministry of Environment and Waters and management authorities of protected areas and Natura 2000 sites;

Feasibility studies for biodiversity restoration projects;

Feasibility studies for afforestation, reforestation and improved management of forests to adapt to climate change;

Preparation of seedlings of autochthonous trees for future afforestation and reforestation;

Raising capacity for biodiversity monitoring with volunteers - extend the use of citizen science platforms for biodiversity monitoring.

With a third version of the plan on the way, civil society would expect a revision to the lists of potentially harmful projects, as well as the inclusion of nature-focused measures.

Source: bankwatch.org