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TO
Mr. TOMISLAV DONCHEV
DEPUTY PRIME MINISTER

SUBJECT: OPINION ON DRAFT NATIONAL PLAN FOR RECOVERY AND RESILIENCE (PRR), SUBMITTED FOR PUBLIC CONSULTATION ON 30.10.2020

DEAR MR. DONCHEV,

The government has provided the time until the end of November for comments on the draft plan. The plan is made public on the web site www.strategy.bg with a deadline for consultations November 29, 2020. <http://www.strategy.bg/PublicConsultations/View.aspx?Id=5572>

I. PROCEDURAL ISSUES REGARDING THE NEXT STEPS

We would like to be informed what are the following rounds for participation of stakeholders you envision, given that the plans must be submitted finalized to the European Commission by the end of April 2020. This means that you, as a representative of the ruling party, will be in the election campaign from the beginning of February. Experience shows that in times of elections there is rarely energy for anything else.

Given that elections are expected in March 2021, please explain what will be the possibilities for further participation before the final version of the plan is drawn up and should we expect an effort to finalize the plan by the end of January or an attempt to postpone (and then rush) things for the post-election phase.

The plan at the current moment does not offer detailed calculations of the planned costs by projects and categories. **Most of the plan is a wish list reciting good practices that can be implemented**

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in the next four years of recovery. This practically makes it just a template, a blank, sixty pages of essay worth BGN 12 billion.

The above confirms the concerns that the plan is structured without sufficient stakeholders' involvement. The Government's approach to work in the dark could be somewhat justified if a sufficiently wide range of experts from various fields, including external experts, were involved in the preparation of the plan and the first version of the plan had some quality to build upon. Now the result will reasonably enrage everyone, because not only stakeholders were deprived of participation in the writing but also the result is, to put it mildly, mediocre. **That is why we call on the Government to continue with the phase of gathering ideas on the plan.**

We find unrealistic the expectations for serious European funding created with the presentation of the PRR as long as the country's main development documents for the period until 2030/50 rely on coal, gasification and economic absurdities such as Belene NPP and Kozloduy 7 while it is well known that no EU funds are available for such adventures. **The money for the Recovery Plan is provided by Brussels, but it is not guaranteed. It will be distributed among the member states on a competitive basis, and if the PRR is sent in this form – devoid of ambition, vision and readiness for reforms there is a real danger a large part of the funds for reconstruction and sustainable economic development to be lost for the Bulgarian country.**

We remind that the funds in the Next Generation EU and Recovery Plan are not EU budget revenues (as those in the forthcoming seven-year financial framework), but Union loans (public debt) of EUR 750 billion. These funds we, as EU citizens, will have to return in the future. The fact that these funds are public debt makes us particularly responsible for the way they will be spent. That is why we cannot afford this plan to remain so general. We have to assume to some extent that with the draft plan submission in this form to the EC, the Government has already largely set the framework of the planned activities.

Our proposal:

Only after a detailed listing of the planned investments by areas and components, a new public debate should be opened and only then the plan should be finalized. An appropriate time frame would be presentation of the second version of the plan in January 2021, then collecting comments during the election campaign, when people will be able to ask their questions to the governing and candidate-governing politicians, and finally review of the comments and finalization of the plan after the elections in March to meet the EC's deadline which is until the end of April for filing up the final version.

II. ON THE PLAN STRUCTURING

A. There is a lack of documentation that should precede the plan

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The main goal of the plan is: "economic and social recovery from the crisis caused by the COVID-19 epidemic and the need to deal with its extraordinary consequences."

However, neither an elaborate analysis of the Crisis has been applied, nor any forecast for the consequences from it. What are the economic and social areas affected?

This is absolutely necessary for the precise identification of the target priorities and hence - the most effective measures for their achievement.

The document follows the priorities of the National Development Strategy Bulgaria 2030. It is not economically and socially justified to base a plan for overcoming the consequences of the crisis on priorities set before its onset! Even less without in-depth analysis and calculation of the scale and the cost of its damage. These requirements are set in both the Draft Regulation and in the EC Guidelines for the preparation of recovery plans.

The sequence of actions should be:

- analysis and identification of the damage and the affected by the pandemic groups of citizens and economic areas,
- prioritization and ranking according to the degree of concern and public importance,
- calculation of the financial resources needed to recover them,
- strengthening and ensuring the sustainability of their development in accordance with the European and national strategic plans.

B. Lack of reference with the EU Multiannual Financial Framework 2021-2027 (MFF)

The Multiannual Financial Framework with allocated funds of 1.1. trillion euro is the fundament. A well elaborated reference with the framework is mandatory. The recovery plan is largely building on and complementing the MFF 2021-2027. Reading the Recovery Plan it is obvious, that many activities and areas are taken in general from other plans for use of budget funds - both national and European. For example, in the case of those 3 billion planned for the renovation of buildings - it is not clear whether this is only provided by the Government within the Renovation wave initiative or more funds are expected from the MFF and the national budget. Other directly related project - "Long-term national strategy for support the renovation of the national building stock of residential and nonresidential buildings until 2050" also does not provide the necessary specifics on the future financial sources for its realization. Although negotiations on the financial framework and programming have not yet been completed, it is important to set figures, even preliminary ones, and where applicable to explain the relationship between the two budgets.

Our recommendation:

The planning should be in line with the long-term financial framework and complementary to the policies and objectives set out in the Partnership Agreement for the period 2021-2027, but should be specifically targeted and not perceived as an additional resource for funding

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reserve projects under operational programs. The connections should be clear and well described.

C. Lack of orientation towards the affected people.

The plan is based on the National Development Program Bulgaria 2030, "adopted at the beginning of the year".

"The distribution of financial resources by pillars of the Plan is prepared on the basis of a specific methodology, consistent with the requirements of the draft regulation on thematic concentration in the areas of green and digital transition, the specific recommendations of the Council addressed to the country in 2019-2020, the reform intentions and the assessment of the necessary financial resources, made by the departments within the process of preparation of Bulgaria 2030 ”.

As can be seen from the available public information, with a Decision of the Council of Ministers of January 20, 2020, the “Vision, goals and priorities” of the National Development Program BULGARIA 2030 have been adopted; <http://www.nccedi.government.bg/bg/node/329>

As can be seen from the announcement of the Ministry of Finance <https://www.minfin.bg/bg/1394> the above mentioned document should be accompanied by: an "indicative financial framework, a preliminary impact assessment and a mechanism for monitoring and control of implementation". Such documents are not publicly available. It is not possible to found out whether they have been prepared. If basic strategic documents are not made and are not adopted in full, this leads to incompleteness and ambiguity of the subsequent documents based on them - such as the current plan. /The same applies to the Partnership Agreement, which is also under discussion at the moment/. This is even more valid for their financial argumentation.

In fact, **the Plan should be oriented towards the affected people.** It should be based on analyses about the identified affected groups, the type and extent of losses suffered. Secondly, it must ensure further sustainable development in the affected areas. It must set these goals in such a way that they are in line with the European strategic documents REACT EU, Green Deal, etc. This is described in detail in the EC Guidelines.

D. There are no clearly defined and easily assessable goals, measures and projects

The proposed project envisions measures and projects and sets goals, many of which have already been set in two programming periods - 14 years, *and which have not yet been implemented.* Without an analysis of the reasons and without mechanisms to ensure their implementation, there is a high risk that the set goals will not be achieved (also this time). **Provided that according to the draft regulation, they must be very clearly specified and easily measurable, and will be reported and evaluated by the EC on an annual basis, there is a very high risk that they will**

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not be achieved and that further funding under the plan will be suspended. The consequences of this will be very severe for the country.

III. ON THE ESSENCE OF THE PLAN

Notes on the pillars and priorities:

There are countless gaps that make a sharp impression even for non-specialists in the specific area. Relying on logical assumptions and having the EU regulations for a base, we will allow ourselves to comment on everything that has impressed us, even outside the field of environment, climate change and sustainable development, where our expertise is.

Almost every new section of the plan begins with a description of a problem or deficit in Bulgaria. This is followed by a list of measures, for which in most cases it is not clear how exactly they correspond in solving the described problem.

Nowhere in the plan any indication is given that the funds will be used as a lever to mobilize private investment while there is such a field and potential.

PILLAR 1: "INNOVATIVE BULGARIA" - BGN 2431.9 million.

1. Area "Education"

Placing education at the top of the list of priorities is justified for its the importance and for the degree it was impacted. This is one of the areas where quick restructuring and change in the way of teaching was necessary to happen. What reform is being proposed?

The plan points out that the online teaching, which is on the agenda again, was not accessible to all of the students during the previous lockdown in March 2020. **But neither a plan is proposed as to how they will be included in case of future lockdowns, nor how they will catch up with the classes they had missed during the last school year.**

Area "Education" of the Plan is yet another example of how a problem has been described, but the proposed measures are not directly related to the solution.

Realistically, the Plan should provide solutions that can make education flexible and that can be used as a ready-made solution in case of similar crisis. Because humanity is not insured against another crisis like this one. And currently the number of deceased teachers is closely following the number of deceased medics.

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The plan should emphasize on efforts to make the teaching profession more open, to increase its attractiveness, to introduce incentives in order to increase the number of teachers, to attract young teachers, to enable them to increase their competencies and digital skills, to introduce platforms for exchanging of experience, to introduce alternative ways of teaching, flexibility of the transition process from one way of teaching to another, and the process of transition between different schools and forms of education for students of different age.

2. Area “Research and Innovation”

How is this area affected by the pandemic? What and why cannot be financed under the respective operational program (OP), that additional funding is required in the plan? A new state agency for research and innovation is planned?! **Is a new state administration the main thing that science lacks and does it have to be financed by measures meant to deal with the pandemic?** In general, public administration funding should be kept to a minimum throughout the plan and the funds should go to those who are really affected.

Opportunities for support and internationalization of innovative SMEs are adequate and we repeat that this needs to be described in details.

A "network of research universities" sounds good, but why aren't they funded by the OP?

3. Area “Intelligent Industry”

A. Main challenges

Losses are reported in the field of construction /decrease of 7.4%/ and in the field of industry /given in general, while industry is a rather broad concept - 10.6%/. **But nowhere is specified which are the most affected industries and which type of industry - light, heavy? A decline in the field of services (which undoubtedly are the most affected), trade, entertainment business, tourism has not been analysed.**

The plan focuses on the SMEs, but does not specify anything. What is the difference from OP "Competitiveness", which provides funding for this target?

B. Program for public support for the development of industrial parks

A new Law on Industrial Parks is cited and Public Support for Industrial Parks is at stake. Is it the construction of industrial parks and the construction of their infrastructure the most appropriate and urgent measure in order to eliminate the imbalance between the country's regions, to stimulate the transition to a circular economy and to help promote eco-innovation?

Our recommendation:

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Industrial parks need progressive management - some of them are headed by such managers, but many others lack such visionaries. Let the plan also focus on how to attract appropriate management to these parks so that they can fit into the idea of Industrial Revolution 4.0, as implied. The country needs real reforms, not only a talk about the need for them. Once a problem is localized, the logic requires a potential solution to this problem to be provided, not solutions to problems that have not been posed at all.

C. Program to support the process of transition to a circular economy in the enterprises

Specific measurable goals such as recycled material flows or reduced emissions need to be set. Important measurable indicators that we should have in this plan (examples) - saved energy, saved emissions, number of beneficiaries.

Speaking of emissions, the plan mentions emissions per capita of just over 8 tonnes per year. According to the World Bank per capita emissions are even lower. <https://data.worldbank.org/indicator/EN.ATM.CO2E.PC?locations=BG>. In any case, one thing is clear - **the largest contribution to emissions in our country is due to the burning of lignite coal in the thermal power plants and there is the key for the reduction of the carbon intensity of the whole economy.** To what extent does the plan say about this step and the need to turn from the use of coal, which has already caused accumulation of heavy losses for the Bulgarian Energy Holding (BEH)? If we assume that the Government has expressed interest to develop a wide range of measures targeting the end-use of energy and market liberalization, and that these steps will lead to a natural reduction of the importance and need of the coal industry, we are not sure that this is an approach that is fair to those working in the coal sector and to the most vulnerable energy consumers.

Our recommendation:

It is necessary to present a plan with set timing – when and to what extent the envisioned measures will be applied, so that citizens and businesses will know at what point in the period 2021-2025 they will be able to take advantage of them. If a measure is envisioned as a restorative one, but it opens on the eve of 2025, what will be the benefit from it? We have witnessed this trend during the first and the second programming periods for the European funds. Examples: 2007-2013 Renovation programs opened at the end of the programming period, and in the current 2014-2020 clean air axis under OP Environment, which provides for replacement of non-efficient heating in the households, has not even started with the public procurement and the investment programs of municipalities!

Everything else, like "stimulation" and "measures" in the field "Intelligent Industry", is presented very general and without specifics.

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PILLAR 2: GREEN BULGARIA - BGN 4,499.0 million.

Circular and Low Carbon Economy

A. Liberalization of the electricity market

Here we expect details of how the plan protects the most vulnerable energy consumers. The liberalization of the energy market is expected to take place in 2025 - i.e. the period of time this plan covers barely captures the moment of full liberalization.

Measures to mitigate the negative effects of the energy market liberalization on the most vulnerable consumers have a place in this plan and are, in our view, acceptable. But why are they missing? Is it not the existence of a national definition of energy poverty one of the requirements for the use of renovation funds? The EC has repeatedly stated that the most vulnerable, as well as the buildings with the worst energy performance, should be prioritized during the renovation. We ask the authors to describe these measures in as much detail as possible, as well as their connection with other plans, strategies and programs.

B. Energy efficiency program

Energy efficiency is considered a top priority and it should not be forgotten that it will play an even greater role in line with the expected update by mid-2021 of the European and national energy efficiency and renewable energy goals, which must be in line with the new increased EU greenhouse gas reduction goal until 2030.

The plan lacks an analysis of the results of the already implemented 2 large-scale programs - one under Operational Programme Regional Development (OPRD) and one national. What has changed as a result of the pandemic?

The measures in the plan do not have any goals and measurable indicators for achieving these goals. Going back to the renovation budget, which is a big item in the plan, we ask what will be achieved with BGN 3 billion? How many homes will be renovated? If we assume that the basic measures (glazing and insulation with the finishing works) on the market cost about BGN 7 000 per apartment in a multi-family building, then BGN 3 billion should be enough for nearly 430 000 households. Assuming that each multi-family building has about 50 homes - this budget should be enough for over 8 500 buildings. If we assume that the new more ambitious levels of energy efficiency require slightly more expensive measures, if they provide ventilation, heating and this increase the investment needed for one home to BGN 10 000, then we cover the needs of 300 000 households. **This type of figures and accounts must be available in the plan. It is also necessary to envision what is to be done with semi-empty multi-family buildings, those with structural problems, as well as with the small multi-family buildings and family houses.** Yes,

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there may be other funding, other programs and financial instruments for them. **It is important all homeowners to be granted access to financing**, and these links and tools should be described in this plan.

Proposal of the Ministry of Regional Development and Public Works for the Energy Efficiency Program within the PRR

We admit right away that we include the above calculations for a provocative reason. There is already a proposal available from the Ministry of Regional Development and Public Works, which offers allocations by types of buildings - residential, municipal and others. <https://www.namrb.org/obsazdane-s-obshtchinite-na-programata-za-ee-po-plana-za-vazstanoviavane-i-ustojtchivost> But this preliminary proposal is only a distribution of large portions of funds. In its real indicators such as the aimed number of renovated homes and saved emissions are missing again. It is not normal to go without such indicative goals - after all, we know things like the average area of dwellings and the average number of dwellings in multi-family residential buildings. If the government wants to avoid a pile of similar reactions, **the plan should be linked to all other available documents and draft documents that concern the measures in the plan and programs with similar measures.**

What is worrying in the proposal is that as a way of financing multi-family and single-family buildings is indicated **the existing mechanism of the National Program for Energy Efficiency of Multifamily Residential Buildings (NPEEMRB)**. Continuation of the program in its old form does not correspond to what is sought through the Renovation Wave (the provision of a 100% grant for already applied buildings, the required energy class C, locking-in of future investments, the materials used and what happens after the end of their life are just few examples of what is problematic). It should also be pointed out how the occupants of buildings that are not on the list of those waiting for funding under the NPEEMRB and OPRD, which is not provided for in the PRS, will also be able to implement energy saving measures. The same needs to be elaborated for those living in single-family residential buildings, for which a modest resource of BGN 103 million is provided. Is a 100% grant also valid for them, when it is written that they will be renewed under the existing mechanism of NPEEMRB?

The draft document of the Ministry of Regional Development and Public Works brings up again ideas about reaching the minimum **energy class C** for residential buildings, which is an unacceptably low level of energy savings. Speaking of achieving class B energy efficiency of buildings after renovation - this is permissible only with a step-by-step approach and only provided that current projects will not block the possibilities for implementation of further energy saving measures so as to reach compliance with the definition of nZEB – a building with "close to zero energy consumption". In case heating, ventilation and renewable energy production are on the list of measures under the renovation program, the goal should be to reach "close to zero energy

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consumption" in order to comply with the new existing EU regulations. This should also be the required level of renovation of public buildings, which should serve as a model. The proposal of the Ministry of Regional Development and Public Works states that "Investments involving the complete renovation of buildings will be a priority", i.e. only class A should be eligible, so that the building will have "close to zero energy consumption".

The draft energy efficiency program within the PRR **excludes buildings belonging to the health infrastructure** while the sector is among the priorities for the EC, including as part of the green recovery. Medical establishments should also be included as eligible buildings for public services. For such buildings with easily planned consumption, the ESCO model is successfully applied, the Energy Efficiency and Renewable Sources Fund (EERF) has also financed many such projects. Therefore, by having such market-based models available there is no need for a grant component and if there is one - it should be minimal. The same is valid for street lighting, for which 15% of BGN 3 billion have been allocated, while a number of municipalities have successfully changed the lighting with the help of ESCO and EERF. **We do not see any support for buildings of cultural value**, which was also missing in the previous renovation programs.

For the future definition of the **“Model for prioritization of residential and public buildings”**, we remind the provisions of the renewed Energy Efficiency Directive - prioritization of buildings with the worst energy performance (including central administration buildings), as well as for vulnerable households, including households affected by energy poverty and where appropriate for social housing.

Our recommendation:

We would like to see in all documents related to the EC's Renovation Wave initiative a declared readiness to act in accordance with the following holistic principles. 6 key characteristics must ensure this integrity and therefore must be woven into the programs that Bulgaria will initiate on its territory in the long run:

1. Buildings are part of the living environment, and it must be healthy and provide the opportunity for prosperity - People must live, work and study in buildings with thermal comfort in all seasons, with good quality of the air they breathe, with sufficient daylight and low levels of noise.
2. Our buildings must be part of the energy infrastructure - They must be in harmonious interaction with the supply networks of electricity and heat.
3. Buildings must achieve high levels of energy efficiency - Energy in buildings should not be wasted. Both old and new buildings must have very low energy consumption.
4. Buildings must be circular in terms of the materials used and the way of living - The possibility of reusing materials and raw materials in the construction and renovation of buildings should be the norm. Buildings must also be able to adapt easily to the changing needs of their occupants and allow for redevelopment over time.

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5. No need to use fossil fuels in / for buildings - Low energy consumption will allow full coverage of the energy needs of buildings with renewable energy sources.

6. Buildings resilient to climate risks - Buildings must be built and renovated with the idea of being resilient to the impact and risks of climate change in mind.

C. Establishment of a national decarbonisation fund.

Nowhere in the plan any indication can be seen that the funds will be used as a lever for mobilization of private investment while there is a field and potential for this.

The National Plan for Recovery and Sustainability, which according to its authors "lays the foundations for green and digital transformation of the economy, in the context of the ambitious goals of the Green Deal" states that "liberalization of the energy market is a key prerequisite for sustainable energy development, with support for the decentralized generation and storage of electricity". Indeed, this single reform provided for in Pillar 2 needs a more detailed description of the long-term vision, objectives and priorities. A more detailed description of the reformist intentions is needed regarding:

- measures to combine energy efficiency with the use of energy from renewable sources for own needs, with a focus on the regulation of the "renewable energy communities" - associations involving civic cooperatives, industrial enterprises and municipalities, which with minimal support can be a catalyst for investments and innovations in the field of low-carbon technologies, while being at the same time also a solution to a pressing social problem – the energy poverty and the subsidies for fossil fuels as aid for heating.

- **creation of a national decarbonisation fund** - this is an important and timely initiative, but again a verbal hotchpotch of financing without set demarcations between this plan and the other funds under which it will be financed. When structuring and capitalizing the national decarbonisation fund, beneficiaries who will have access to this fund and the financial mechanisms that will be set up to support the implementation of the above measures should be identified (credit lines for citizens and businesses, bank guarantees or green government bonds and other financial instruments). It is not clear which priorities of the plan will be funded, who will manage it? What functions and goals of the fund will be under the "Recovery" heading? There is also no planned budget. How much of the BGN 3 billion under the Energy Efficiency Program under the Green Bulgaria pillar will go through it? Still, we note as a positive point the intention of the Fund to create a single point for technical assistance to applicants through one-stop counters, which is especially necessary in the case of renewal programs.

Will only more plans and strategies be signed under this activity and will there be real investments in decarbonisation? What do we really want to achieve with the Decarbonisation Fund, when in practice we do not plan to decarbonise anything until 2030 according to the figures in NECP, let alone to have an ambition for decarbonisation till 2025? Has anything changed in the national goals since the final NECP was issued in February? We will be happy if so! Given that the structuring of this fund will take place under the direct supervision of

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the EC, we have increased expectations for this synergy and, accordingly, for a better end result. We certainly do not want mediocre measures, nor measures that will remain only on paper.

D. Digital transformation and development of information systems

Update of the described aspects of the transmission network is important and timely. We expect presentation of details and calculations of how BGN 511 million will be invested. At least these are mostly centralized projects and there will be a huge participation of state structures in the development of these projects, so even at this stage it should be possible a more detailed concept to be presented. We expect this part to be completed. We expect information what other programs will be supplementary and what will be the demarcation.

2. Area “Biodiversity”

Bulgaria is in criminal proceedings for lack of management plans for NATURA 2000 zones! In the recovery plan, the allocation of ANOTHER BGN 38 million for the management of Natura zones is not well justified as a link between the pandemic and the restoration. Why not under OP Environment (OPE)? Are these funds additional to the national budget and the OPE budget? What do we aim to achieve as an end result and who are the targeted beneficiaries?

3. Area “Sustainable Agriculture”

Is it the lack of digital technologies in agriculture and awareness of producers, as well as the need to improve the existing hydro-ameliorative structure the "identified main challenges" to achieve the defined goal "increasing the competitiveness of the agricultural sector and water use"? - These are 2 project areas. Digital agriculture is appropriate, but how many more innovation programs do we need? Support has been declared for small farmers, but without anti-cartel measures this will not happen. It is important to get together the agricultural production with small enterprises for primary processing of agricultural products, owned by the producers of primary products themselves! It is important to explore and integrate the opportunities for the introduction of new crops as an adaptation measure to climate change, especially for fruit growing, gardening, planting forests on agricultural land.

No measures directed to livestock are specified. Emphasis is needed on food and food production for the population, as well as a greater focus on jobs and stimulation of entrepreneurship and producer cooperation. Restoration of the Bulgarian village is a major way to deal with the consequences of this and subsequent pandemics. We witnessed a very clear trend and preferences during the first lockdown in March 2020, when many people withdrew to the villages. With more support for local people and communities, this is a great time to breathe back a dose of life to the rural regions and preserve and increase the energy invested in their maintenance.

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Our recommendation:

A set of measures aimed at the restoration of the Bulgarian countryside, including basic utilities, such as delivery of basic products, medical, pharmacy care, transport connectivity, etc. /not included in the current program for rural areas/ will be of great benefit and in line with the climate goals.

PILLAR 3: CONNECTED BULGARIA - BGN 2 675.1 million.

1. Area “Digital Connectivity” - ok

2. Area “Transport connectivity”

It is a positive trend that measures for improvement of the railway transport are envisioned. But how does this complement and upgrade OP Transport?

We approve the measure, which provides for the installation of RES for own use, which will contribute to the green mix of electricity used in railway transport. However, we wonder why, given that it is state property - National railway infrastructure company (NRIC), stations, BDZ Freight, BDZ Public transport - at least in cases where the Government has full control over the implementation of the measure, there is no detailed calculations in the plan? Let's see for such specific measures - what budget, what installed capacity, on what area (only roofs or also abandoned industrial land in the area around the stations), what share of the electricity the railways use will be satisfied by the installed photovoltaics? Also could these projects use the funds from the plan only as a lever to attract private investors and develop projects on a market basis? In our opinion, yes.

3. Area “Local Development”

Emphasis is put again on the Industrial Parks Act, the construction of sewers and water treatment plants. A system at the Ministry of Interior for disaster response is needed, but is it not already planned in other programs as well?

Local communities are vaguely mentioned. This part should be further developed in the context of CLLD (Community-Led Local Development) and combined with the condition that the teams of structures such as LAGs (Local Action Groups) undergo continuous training in the spirit of lifelong learning in order to ensure development of projects at local level that are in the spirit of the times, that are not outdated and proofed as impractical endeavours.

PILLAR 4: FAIR BULGARIA - BGN 2553.5 million.

/ Least money /

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1. Area “Business Environment”

E-justice, reduction of the administrative burden in the insolvency procedures. Provision of BGN 23 million for the electronic exchange of files between the administrative courts and the Supreme Administrative Court (SAC) and modules for electronic summoning and conduction of online cases. This, of course, is necessary, but should BGN 23 million be given under the plan for recovery to achieve this result? E-justice - BGN 1.5 million. Why don't we do this with funds from the budget for justice? Creation of a unified information system of the courts - BGN 53 million. Creation of a national intelligent security system and measures for counteracting corruption among the employees of the Ministry of Interior - BGN 168.9 million. Digitization of the information files of the administration - Registry Agency, Geodesy Agency, cartography and cadastre, National Health Insurance Fund (NHIF), National Social Security Institute (NSSI) - BGN 150 million. All these activities are related to “Good Governance”, for which there is an Operational Program, with funds provided under it. Why are these projects not included there? Why these measures for 2 programming periods are not already fulfilled, even though the funds were "used" every time?

2. Area “Social Inclusion”

Several projects are presented, such as the creation of a national map for social inclusion. The rest is continuation of the general measures, which have been repeated for years throughout all programming periods - for the elderly, people with disabilities, vulnerable groups. “My competence” and the “Silver economy” are specifically mentioned - which are specific areas but are not well described as types of measures. It is necessary to specify the measures, towards specific affected groups and towards specific consequences that are due to the pandemic.

3. Area “Culture”

This is one of the most affected areas but the plan provides for it very generally in one paragraph of several lines - access to European cultural exchange for BGN 60 million. This means nothing. Nothing like a more specific plan for support of the affected institutions by genres and artists. BGN 120 million are provided for digitalization of library and museum funds. It is important the plan to provide specific measures for the community centers - they are affected and are important part of the cultural life of the local communities.

4. Area “Healthcare” - This section is scandalous for many reasons.

First, it is unacceptable the healthcare to be positioned on the last place. Its importance and the degree of impact presuppose it to be on the first and main place in the Recovery and Sustainability Plan. And the presented several general projects show a superficial and inadequate attitude towards a major problem and this is cynicism towards the citizens and

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scandalous towards the Bulgarian medics and medical staff, who have taken the main burden in the service of society - some with irreversible consequences.

After declaring the importance and deficits of our health system, the plan outlines planned "reforms and investments". Then a total of 5 projects are listed. They are generally characterized by planned improvements on the material and technical base. No idea for reform has been planned and indicated, much less any vision for reforms has been analysed and developed. Here is a short comment:

- Modernization of the material base of state and municipal medical institutions and introduction of innovative technologies for treatment of the population - BGN 607 million. For modernization and renovation of material and technical base, energy efficiency, medical equipment. - Most state and municipal hospitals and health facilities, commercial companies according to the Commercial Law (CA), are in a very difficult financial situation, with huge debts and bankruptcy. Experience to date regarding OPRD has shown that any investment in them, especially under the rules of European funding, is difficult to defend and achieve and are considered as high risk.
- Establishment of a center for training and development of a center for interventional neuroradiology – BGN 7.5 million - "to increase the knowledge and skills of medical professionals".
- Strengthening the capacity of the Medical Institute at the Ministry of Interior - BGN 77 million, again mainly the material and technical base.
- Modernization and development of psychiatric care - BGN 33.6 million.
- Development of the national emergency call system with a single European number 112. Creation of new generation emergency call centers /just in case it is also written in English Next Generation 11 - BGN 56.7 million/. On the last position in the plan and with less funding than the repair of the Interior Ministry hospital!

Not a single reform is planned. Not a single measure or a goal to improve the organization and the efficiency of the healthcare system in order to facilitate the work of specialists, general practitioners, nurses, paramedics, health mediators. Nothing is provided to increase the efficiency of medical services. Not a word about preventive medical care. The current pandemic has proved what a commercial and inefficient hell our health workers are forced to work in. Many doctors and medical personnel lost their lives in the pandemic while helping. Many could not withstand the psychological pressure. How does this plan compensate for the healthcare system and help to fix the gaping holes caused by the pandemic? And how do we compensate the families of the deceased medics, for whom the consequences remain forever?

With respect:

Todor Todorov, Climate and energy Coordinator

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ZA ZEMIATA – Friends of the Earth Bulgaria is an independent non-governmental organization, a member of the international organizations CAN Europe (Climate Action Network Europe), CEE Bankwatch Network (International Financial Institutions Monitoring Network for Central and Eastern Europe), ZWE (Zero Waste - Europe), GAIA (Global Alliance for Incinerator Alternatives), as well as member of the following national Coalitions: "For the Nature in Bulgaria", "Bulgarian Anti-Nuclear Coalition", "Bulgaria without Cyanides", "Coalition for Sustainable Use of European Union Funds" and "Climate Coalition - Bulgaria”

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