

**To:**

**Atanas Pekanov,**

Deputy Prime Minister for EU Funds Management and  
Chairman of the European Green Deal Council (EGDC)

**Iva Petrova,**

Deputy Minister for Energy

**Mariya Trifonova,**

Vice-Chairman of the Energy Transition Commission (ETC)

**Members of the Energy Transition Commission (ETC)**

**Copy to:**

**Cvetan Kyulanov,**

Head of EC Representation in Bulgaria

**Céline Gauer,**

Head of the Recovery and Sustainability Working Group

**Agnes Monfret,**

Head of Unit "Bulgaria, Croatia and Slovenia", DG REGIO

**Subject: Negotiations between Bulgaria and the European Commission on the possibility of revising the C4.R10 reform in the Bulgarian National Recovery and Resilience Plan (NRRP)**

**Dear Mr. Pekanov,**

**Dear Co-Chairs, Members of the ETC,**

With this letter, on behalf of WWF Bulgaria, Greenpeace Bulgaria and Environmental Association "Za Zemiata", as members and observers of the Energy Transition Commission (ETC) of the European Green Deal Council (EGDC), **we ask that members and observers of the ETC be provided with the full:**

**1) Bulgaria's national position<sup>1</sup>** , in relation to the request by the caretaker government of the Republic of Bulgaria to renegotiate the C4.R10 reform to decarbonise the power sector in the NRRP;

**2) Accompanying analyses and justifications** prepared by the Ministry of Energy, the Ministry of Environment and Water, and the Office of the Deputy Prime Minister for EU Funds Management Mr. Atanas Pekanov.

We note that the information related to the update of the C4.R10 reform is crucial for the continuation of the work of the ETC on the preparation and review of the report and its modelling, representing the "**Roadmap to Climate Neutrality for Bulgaria**" and set out and agreed between Bulgaria and the European institutions as Reform 9 (C4.R9) in the NRRP. In the period since the decision on 12.01.2023 by the National Assembly, obliging the Council of Ministers to initiate an amendment to the NRRP regarding energy transition, ETC members have not been informed of any proposals and justifications prepared by the experts of the Ministry of Energy, the Ministry of Environment and Water and Mr. Pekanov's office - neither through electronic communication, nor by convening ETC meetings.

**We urge for documents, accompanying Bulgaria's position in the negotiations, to be made available to ETC members; for an ETC meeting be convened to provide members with the argumentation for amendment of Reform C4.R10, and an opportunity for feedback from ETC members to be ensured.**

We find that it is very very important to share this information with the Bulgarian society. In this regard, we are particularly concerned by the indications that the economic justification for the request to remove or completely revise the C4.R10 reform is no longer valid, given the latest data on power generation and exports from the coal plants, and the deteriorating financial standing of the state-owned "Maritsa East 2" plant<sup>2</sup> . The operation of "Maritsa-East 2" poses serious health risks to the population, in relation to its mercury and sulphur dioxide pollution, which has been reaffirmed by the Court of Justice of the European Union, and may require future curtailment of the plant's operations<sup>3</sup>. Equally important are developments regarding the European Public Prosecutor's Office and Bulgarian authorities' investigations into multi-million euro fraud, related to reporting of carbon emissions from some Bulgarian coal-fired power plants<sup>4 5</sup>.

Against this backdrop, the ongoing controversy over whether to key payments under the NRRP and Territorial Just Transition Plans, amounting to hundreds of millions of euros - vitally needed by coal regions, is particularly worrying.<sup>6</sup>

These factors, combined with the rapid development of renewable energy capacity and the expiration of long-term power purchase agreements for some plants within the lifetime of the NAP, **may place Bulgaria in a situation where it is de facto fulfilling its commitments under Reform C4.R10, while seeking its amendment.**

We also recall that Bulgaria is obliged to strictly follow the EU framework for planning decarbonisation policies in the Member States, namely by updating the **National Energy and Climate Plan (NECP) and the Long-Term Decarbonisation Strategy (LTS)**. This should be done on the basis of objective and

---

1 Announced by the Minister of Energy: <https://bnr.bg/radiobulgaria/post/101799336>

2 [https://www.capital.bg/biznes/energetika/2023/02/21/4452036\\_tec\\_marica\\_iztok\\_2\\_veche\\_trudno\\_prodava/](https://www.capital.bg/biznes/energetika/2023/02/21/4452036_tec_marica_iztok_2_veche_trudno_prodava/)

3 [https://www.capital.bg/biznes/energetika/2023/03/09/4458444\\_ogranichavaneto\\_na\\_deinostta\\_na\\_tec\\_marica\\_iztok\\_2/](https://www.capital.bg/biznes/energetika/2023/03/09/4458444_ogranichavaneto_na_deinostta_na_tec_marica_iztok_2/)

4 <https://www.eppo.europa.eu/en/news/bulgaria-eppo-probes-multi-million-euro-fraud-regarding-greenhouse-gas-emissions>

5 <https://www.zazemiata.org/tecove-na-kovachki-ne-dokladvat-emisii/>

6 <https://www.mediapool.bg/sas-zarovena-v-kyumyura-glava-bulgaria-mozhe-da-izgubi-10-mlrd-evro-za-zelen-prehod-news346097.html>

transparent modelling of decarbonisation by sector, which is **the most important task currently delegated to the ETC.**

In this respect, it is important to follow **the principle of establishing a multilevel dialogue, as set out in Article 11 of Regulation (EU) 2018/1999 on the Governance of the Energy Union** and good practices, developed by the EC in its NECP guidance document, published in December 2022.<sup>7</sup> The updated NECP and LTS should include **increased decarbonisation ambition, as well as realistic trajectories to reduce emissions from the electricity and other sectors**, in line with the EU's target of 55% emissions reduction by 2030 and climate neutrality by 2050.

**The Energy Transition Commission can and needs to be involved in the multilevel dialogue process, and contribute expertise and feedback from stakeholder representatives.**

Sincerely,

**Members and observers of the Energy Transition Commission:**

Meglana Antonova, Director of Greenpeace Bulgaria

[meglana.antonova@greenpeace.org](mailto:meglana.antonova@greenpeace.org)

Apostol Dyankov, Head of Climate and Energy Programme, WWF Bulgaria

[adyankov@wwf.bg](mailto:adyankov@wwf.bg)

Todor Todorov, Energy Transition Coordinator at “Za Zemiata” and Bankwatch Network

[t.todorov@zazemiata.org](mailto:t.todorov@zazemiata.org)

---

<sup>7</sup> [https://energy.ec.europa.eu/guidance-ms-updated-necps-2021-2030\\_en](https://energy.ec.europa.eu/guidance-ms-updated-necps-2021-2030_en)