



Za Zemiata
Friends of the Earth Bulgaria

Address: 24 Krastyo Safarov str., 1164 Sofia
Correspondence address: PO Box 325, 1000 Sofia
phone: +359 2 943 11 23
www.zazemiata.org e-mail: info@zazemiata.org

Position and recommendations of EA Za Zemiata regarding the transparency and participation process in Bulgaria

As of July 2023, Bulgaria remains the only country which has not submitted its Territorial Just Transition Plans (TJTPs), despite DG Regio putting June 2023 as the final submission deadline and in contrast with the Reforms and investments agreed in the National Recovery and Resilience Plan (namely C4.R9: Roadmap to Climate Neutrality and C4.R10: Decarbonisation of the energy sector)

We are fully convinced that the Just Transition Fund is a key tool in the decarbonisation of the coal regions and the successful implementation of the Territorial Just Transition Plans will be crucial in reassuring people that an energy transition is possible and can be done in a just way and furthermore in establishing the trust in the regions.

However, we, as representatives of the civil society sector, have increasing concerns with the transparency process and the compliance with the partnership, obligatory for Cohesion funds use.

The Energy Transition Commission (ETC) which was established in 2022 with the responsibility of developing Bulgaria's roadmap to achieving its energy and climate goals in line with the European Green Deal. In the end of 2022, the ETC was suspended without completing the report with recommendations to the Bulgarian government and with no explanation provided.

Following an initial consultation period of 3 weeks in August 2022 of the first draft of the TJTPs, no further public consultations have taken place. Furthermore, we have ongoing issues with accessing any subsequent drafts of the TJTPs despite being aware that these exist and have been informally submitted to the EC and the comments by the EC have not been made publicly available. We are particularly disappointed by the lack of any formal feedback on the comments to the public consultation and the lack of explanation on why comments have or have not been taken into consideration.

In May 2023, we participated in a working group (the only such group established so far) on the TJTPs at the Ministry of Regional development, where we, as participants, submitted five projects - four of which were drafted by active citizens and municipalities and one - by Za Zemiata. So far there has been no feedback on whether they have been approved for inclusion.

With the timeline of the submission being pushed back to September 2023, we remain concerned about the state of public involvement as it has been lacking so far. We would like to urge the European Commission to remind the Bulgarian government that public participation and transparency are crucial for the success of the TJTPs as well as any other key strategic plan such as the Recovery and Resilience Plan.

We would like to put forward our recommendations for a transparent process and public involvement:

- From July 2023 until the submission of the TJTPs: open dialogue with all relevant stakeholders, including sharing the draft versions of the TJTPs submitted alongside the EC' comments
- Inclusion of a wide spectrum of representatives of the civil society, including environmental, social, cultural and youth in the Monitoring Committee for Operational Programme Regions in Growth, ideally before the formal submission of the TJTPs. Note: At the moment the current Monitoring Committee does not include representatives from the environmental non-governmental organisations for example.
- A public consultation to be held for an adequate amount of time (at least one month) prior to the formal submission of the TJTPs to the European Commission. Feedback to be provided as a response to the comments.
- The establishment of a monitoring body specific to the implementation of the TJTP. This should again include a wide spectrum of relevant stakeholders.
- Establishment of regional committees specific to each coal region.

Recommendations:

Amongst the measures we would welcome in the Territorial Just Transition Plans are the following:

- Decarbonisation but also decentralisation of the energy sector in a way that supports individual consumers, rather than favouring investments in energy megaprojects.
- Measures to improve the energy efficiency of buildings and investment in deep renovation of buildings.
- Ensuring access to renewable energy for individual households and the establishment of energy communities, including with the participation of municipalities, coal workers, and energy poor households.

Please find as Annex also specific proposals sent in that regard to the MRD that are relevant to the Just Transition process and REPowerEU measures.

Contacts

Todor Todorov, Energy & Climate Coordinator at EA Za Zemiata, National Campaigner for Energy Transformation at CEE Bankwatch Network

t.todorov@zazemiata.org

Ventzeslava Kojouharova, Energy & Climate Coordinator at EA Za Zemiata, National Campaigner for Energy Transformation at CEE Bankwatch Network

veni.kojouharova@zazemiata.org