



The first NECP draft is a timid and partial plan to meet climate goals by 2030

/ summary of the [Position Statement](#) of Environmental Association Za Zemiata (Friends of the Earth - Bulgaria) on the draft update of the National Energy and Climate Plan of the Republic of Bulgaria 2021-2030 from 22.12.2023 /

Almost six months after the deadline to submit a draft of the updated National Energy and Climate Plan (NECP), Bulgaria published a first version of the document on 22 December 2023. It is probably a coincidence that this happened one day after the European Commission's notice of the start of the [infringement procedure](#) against Bulgaria as it has not submitted its NECP draft to the Commission within the statutory deadline of 30 June 2023.

The current published NECP version gives the impression that it solely presents the current policies and measures in Bulgaria but not how they will change to achieve the national interests in line with the energy transition and achieving a safe climate.

The good news is that, for the first time, there is mention of a national objective of achieving climate neutrality by 2050. However, there is a lack of specificity on what needs to happen to achieve the big goal in the period up to 2030 - which is the period covered in the NECP. It is crucial to include interim milestones and capacities/measures for the phase-out of coal mines and power in the NECP, information, which is still missing in the adopted Territorial Just Transitional Plans (TJTPs). With regards to the villages of Beli Bryag and Troyanovo in the Stara Zagora region which are being **displaced** due to coal mining, a clear plan is needed, outlining which areas will be affected by future coal mining in the already declining due to economic reasons coal mining activities in the Maritsa East Mines.

There are no sectoral targets in the draft and **the existing targets for the renewable energy share and energy efficiency are either at the minimum required level or even below it**, as it became clear from the Communication of the Commission on its [assessment of the NECP drafts of the Member States by the Commission](#) published on 18 December 2023 (Table 2, the minimum RES target in final consumption should be 33% instead of the submitted 29.9%).

Another specific example from the text is the complete absence of the **problem of oil dependency** in the national transport system, as well as an analysis of its causes, objectives and measures to overcome it, despite the very clear requirement for this in the Commission's Guidelines. We insist on planning for the reduction and **end-date of the use of oil and also of fossil gas**. More serious attention must be paid not only to how to diversify gas sources, but to how to reduce dependence in general. Serious reconsideration is needed on **plans for**

household gasification, as well as with regards to **the desire to develop domestic gas and oil production**, which is at odds with the European trends to reduce their consumption. Bulgaria clearly needs to move in the direction of future-proof renewable energy sources rather than risk a new lock-in to fossil fuels - any new investment in fossil fuel extraction risks stranded assets and is futile in the long term.

If it will be developing its **nuclear energy**, Bulgaria needs to take into account all factors, risks and financial constraints, which is not currently done. Lifecycle costs of the new capacities are not taken into consideration. There are no realistic construction timelines, no alternatives on what the country will do in case of serious project delays or the inability to achieve the projected decarbonisation step in a given year. There is no plan or even mention of the need to manage the used nuclear fuel previously exported to Russia.

In one form or another, the claim of putting '**energy efficiency first**' has been repeatedly made, but we remain doubtful about the understanding of the term, and the possible trajectories for achieving it.

We suggest that the widespread issue of energy poverty in the country is strategically addressed in line with the definition in the Energy Efficiency Directive (EED). We recommend addressing the cooling supply as part of the mix of solutions to the increasing summer energy poverty.

Designing, complying and implementing an array of policies and measures to increase energy efficiency in the different sectors, and especially monitoring the achieved results, is a key prerequisite for the **satisfactory implementation of the NECP**. To complete the one-stop shop reform for building renovation, and to implement it in practice. Additional services such as training energy auditors, liaising with financial institutions, training installers, and local energy champions are just a few of our ideas.

We very much hope that once the final draft containing the results of the currently missing modelling is published, **sufficient time will be allowed for public consultation - at least 8 weeks!**

We remain open for feedback on the position statement on:

info@zazemiata.org



This position statement was prepared as part of the LIFE project "Together For 1.5", co-funded by the European Union. The views and opinions expressed are solely those of the author(s) and do not necessarily reflect those of the European Union or CINEA. Neither the European Union nor the funding body can be held responsible for them.