



proper planning waste reduction smart economy composting



Bulgaria: Resource Efficiency

Position of the Bulgarian Coalition for Sustainable use of the EU Funds and CEE Bankwatch Network: EU Funds for Resource Efficiency and Sustainable Waste Management 2014 - 2020

Recommendations

CEE Bankwatch Network, in cooperation with the Bulgarian Coalition for Sustainable Use of the EU Funds⁸ is proposing the following measures to be implemented in the process of planning and programming of the future Cohesion Policy instruments in the field of resource efficiency and waste management:

- Close adherence to the binding waste hierarchy in the programming and management of the available EU funding
- Phasing out of projects for the construction of landfills and disposal sites and further concentration of investments towards the upper-levels of the Waste Hierarchy in the next programming period
- Setting a strategic goal of 60% recycling of residual waste to be reached by 2020.
- Result-oriented, measurable and sustainable indicators, decoupled from GDP to be employed for evaluation of progress towards the future OP Environment strategic targets and objectives
- Systematically developed sectoral strategies and action plans for resource efficiency
- Initiatives aimed at managing consumption and demand to be put into practice (focus not exclusively on production patterns)
- Priority resources to be identified, waste to be considered a resource
- Development of strong institutional setup⁹
- Implementation of ‘good examples’

Context of the proposal

According to the official national statistics¹⁰, in 2010 Bulgaria generated 3 091 000 tonnes of municipal waste, which is 589 000 tonnes less compared to 2005. The recycling rates are also gradually increasing; reaching a total value of 26 000 tonnes in 2010, which is 25, 7 more than the value for 2006. However, the improvement could not be considered as major or fully compliant with the overall strategy, targeted results and the regulatory framework of the EU. Such an approach cannot result in the fulfillment of the ex-ante conditionalities for EU funds management for the future Cohesion Policy. At the moment this remains heavily dependent on crucial system improvements.

Within this context, it has to be noted that for the present programming period Bulgaria did not manage to efficiently utilize the funding resources for waste management provided under Priority Axis 2 Improvement and Development of the Waste Management Infrastructure of the national Operational Programme Environment 2007-2013. The total budget of the programme accounted to EUR 1 800 748 085, of which the actual payments until August 2011 reached only around 14% (the lowest rate in comparison to the other six OPs).

7 <http://bankwatch.org/sites/default/files/EBRD-energy-tug-of-war.pdf> p.33-34

8 The Bulgarian Coalition is currently comprised by 36 environmental and social NGOs

9 In the current programming period the major amount of funds available under Priority Axis 1 Improvement and Development of Waste Water and 2 Improvement and Development of Waste Treatment Infrastructure remained unutilized due to the fact that responsibilities EC delegated at MS level were further left for realization at municipal level. The insufficient capacity in terms of financial and human resources prevented municipal authorities from the opportunity to use the resources available and to develop result-oriented projects over the long-term. For the next programming period, substantial modifications in the present system of the funding management has to be implemented towards developing options for collaborative participation of both municipal authorities at national level.

10 Statistics of the Bulgarian Statistical Institute (NSI) <http://www.nsi.bg/otrasalen.php?otr=38>



Although, strategic objectives for waste prevention, re-use and recycling, laid down in compliance with the binding waste hierarchy were clearly outlined in the OPE, the development of infrastructure for the construction of regional landfills was still the primary objective in practice and remain the only direction for projects realization under Priority Axis 2. As of September 2011, under this priority axis, 47 projects in total are at different stages of implementation, 35 of them being for Technical Assistance (preparing investment proposals, etc). The rest of the ongoing projects concern the construction of regional landfills - at present, six regional waste landfills are in the process of construction and 23 more are at different stages of preparation for construction.

In addition, it has to be noted that the National Waste Management Programme (2009-2013) made provisions for the construction of 56 regional landfills for solid waste disposal to be finalized within the framework of the present programming period. Until present, only 26 regional landfills were made operative in compliance with the requirements set in the Landfill Directive¹¹. As the construction of the envisaged landfills was heavily delayed, the Government of Bulgaria has taken measures to speed up the construction of missing landfill infrastructure and the realization of a programme of new landfills is under way.

The remaining landfills will be a priority measure for financing in the upcoming programming period as well, in contradiction with the overall EU legislative framework, providing for binding adherence to the waste hierarchy and the overall targets and goals set in respective EU Directives, Regulations and strategic documents. This will expectedly divert financial resources in the next programming period as well from investments in the upper levels of the waste hierarchy, resulting in an overall delay for the introduction of sustainable measures for resource efficiency in Bulgaria.

To conclude, regarding the amounts of funding absorbed as well as the realization of the set objectives, Bulgaria has failed in reaching lasting solutions in the area of resource efficiency and waste management in particular, in the process of EU funding management for the present programming period. More importantly, it has to be considered that the present situation imposes a serious risk to the sustainable spending in the future budget for resource efficiency and waste management in Bulgaria within the framework of the next programming period.

Challenges for Bulgaria in the field of Resource Efficiency within the context of the EU strategic goals and targets

For the next programming period the Cohesion Policy interventions must have a strong focus on the Europe 2020 goals and objectives. In order to ensure the achievement of the binding targets of the Waste Framework Directive and in general to respond to the commitments made within the framework of the EU 2020 Strategy, namely a 50% recycling rate of municipal and 70% recycling of construction and demolition waste, the Bulgarian authorities are expected to focus on the implementation of an approach in line with the provisions of the new Resource Efficiency Roadmap, adopted in May 2012.

For the present programming period, the tendencies for Bulgaria in terms of resource efficiency indicators are especially negative, considering that Bulgaria exceeds the EU average levels for material resources use per capita and consumes resources at similar levels to much more productive economies as Germany, France and Poland (values for per capita use of material resources for 2008¹²). The statistics for material productivity demonstrate that Bulgaria is at the bottom of the list, followed only by Romania and far behind the average levels for the EU 27.

Despite these tendencies, Bulgaria does not have a Resource Efficiency Strategy or Plan of Action stipulating a long-term vision and taking into consideration the various instruments, mechanisms, policies, strategies on EU and national level. There are, however, various operative policy documents that provide for measures on effectiveness of resources and that define priorities on waste management targets and values, still, without any explicitly stated interlinkages or established interdependence.

Therefore, it is highly recommendable for the national authorities, to develop a strategy on resource efficiency, based on current statistical data, relevant, result-oriented and measurable indicators, consideration of the relevant European regulatory framework and the overall EU priorities and targets. Such a national strategy should address the following major problematic areas:

1. Low levels of recycling, high levels of land filling of waste, which still remains the most common waste disposal method in Bulgaria, practically 100% landfilling¹³;
2. High and gradually increasing rates of waste generation;
3. Low resource productivity¹⁴;

11 Directive 1999/31/EC

12 European Environmental Agency http://www.ier.org.tw/smm/2_MATERIAL_USE_AND_RESOURCE_EFFICIENCY_IN_THE_EU.pdf

13 Eurostat data, 2009



4. Lack of effective enforcement mechanisms for waste legislation, compatible with the EU standards, as basis for the promotion of continual improvement towards sustainable waste management;
5. Inefficient system of indicators for measuring the real impact of the National Waste Management Programme and the municipal Waste Management Plans;
6. Ineffective control of the authorities over the Extended Producer Responsibility (EPR) schemes, resulting in overall unsatisfactory levels in terms of recycling;
7. Overall low quality environmental performance of products throughout their life cycle (the so-called "integrated product policy" of the European Commission);
8. The quality of the information gathered on the monitoring of waste in Bulgaria is still not at the desired level. The reporting, registration, processing and analysis of the waste management information remain problematic;

Opportunities

While the aforementioned aspects of the policy in Bulgaria have an overall negative influence over the long-term effectiveness of the invested public funding, it has been already proved in practice, that the strict adherence to the waste hierarchy has huge potential in terms of major social and economic benefits such as energy and material savings, reduction of dependence on raw materials imports, employment, etc. It is estimated that the waste management sector and recycling industries alone provided between 1.2 to 1.5 million jobs in the EU.

To this end, in the following sections, we would like to bring to your attention the areas of intervention, we identify as requiring systematic improvement and specific investment concentration in the process of the funding allocation for the programming period 2014-2020.

Implementation of the Waste Hierarchy

- We recommend the allocation of the available funding under the new OP Environment 2014-2020, within the waste management priority, to be based on the defined hierarchy of waste management, providing for priority funding of measures towards waste prevention, re-use and recycling over waste recovery and disposal as laid down in the Roadmap to a Resource Efficient Europe.
- Derogations from the hierarchy are to be justified on the basis of a life-cycle analysis, including social and cost-benefit analysis.

Setting quality result-oriented indicators

The objectives of the present national Operational Programme Environment are as follows:

- Strengthen the competitiveness of the economy to achieve high and sustainable growth;
- Develop human capital to ensure higher employment, income and social integration¹⁵

The objectives of the Priority axis 2 – Improvement and development of waste treatment infrastructure are as follows:

- Improve the waste management in the country in compliance with the defined hierarchy for waste management (prevention, utilization and final treatment).
- Improve the soil and groundwater condition and to decrease the part of the country's territory covered with existing landfills for household waste.

The following impact, result and output indicators are identified, with the purpose of measuring progress on the implementation of the priority axis¹⁶:

- Population served by integrated waste management systems
- Areas of remediated sites as a result from re-cultivation and closure
- Number of constructed/completed regional facilities/installations for waste treatment
- Number of constructed facilities/installations for pre-treatment of waste
- Number of regional facilities for recycling of construction and demolition waste
- Number of closed landfills that do not comply with legal requirements

We recommend the employment of appropriate indicators, measuring the direct impact of the invested funding, decoupled from GDP, based on resource efficiency and material flow accounting.

14 Eurostat data, 2009 <http://epp.eurostat.ec.europa.eu/tgm/table.do?tab=table&init=1&plugin=1&language=en&pcode=tsdpc100>

15 Bulgarian Operational Programme Environment, 2007-2013, p. 4

16 OPE, p. 37



Decrease the overall amount of waste

Indicator: waste production

The aim of the indicator is to support projects leading to waste prevention and reuse within the industry.

Decrease the amount of municipal waste

Indicator: municipal waste production

The aim of the indicator is to support projects leading to waste prevention and reuse in municipalities.

Increase material recovery of municipal waste

Indicator: material recovery ratio of municipal waste

The aim of the indicator is to support projects leading to waste separation, recycling and other material recovery.

Defining strategic priorities and objectives is a crucial step towards reaching long-term impacts.

We recommend the set up of concrete values and targets towards achieving results in the areas of waste management and resource efficiency, following the positive examples of other MSs in the process of EU funding planning and programming (e.g Hungary has set up the following measurable targets: Reducing the quantity of yearly waste produced by 20%, at least 70% of the construction-demolition waste should be recycled until 2020¹⁷, etc).

Recommendations for measures in place

In line with the targeted recycling rates of 50% of municipal and 70% of C&D waste, we consider the process of phasing out of projects for construction of landfills and disposal sites and the further concentration of investments towards the upper-levels of the Waste Hierarchy in the next programming period, as a necessary step for contributing to the key EU targets. Within this context, we recommend the following measures to be introduced as part of the framework under the future OP Environment.

Measures for Waste Prevention

Waste prevention is to be considered as the ultimate goal for increased resource efficiency and reduced negative environmental impact. The prevention and eventually the minimization of waste quantities require the implementation of a complex set of measures directed towards both individuals and industries. We recommend the introduction of several indicative policy instruments in the National Waste Management Plan, already employed in various EU MSs, with direct impact on the minimization of waste values, namely:

- The setting up of specific targets for decrease in the generated waste estimated per capita and the employment of relevant impact indicator, on the basis of which the gradual progress to be measured.
- The setting up of overall requirements for industries towards improvements in the manufacturing process and eco-design of products.
- The development of country-specific strategic methodologies for decoupling economic growth/consumption and waste generation.

Possible policy instruments with direct impact on minimization of waste generation

Provision of information on waste prevention

The policy instrument includes incentives of municipalities for informing citizens on waste quantities and treatment and providing practical guidance with the purpose of increasing motivation for source separation and waste prevention in households. It is estimated that such informative measures, intended towards households and industries may reduce waste intensities with up to 10%¹⁸ (Swedish Environmental Research Institute (SERI), 2010, p.15);

Potential Impact: Practical experience with such campaigns has proven that waste quantities are indeed affected, e.g. Sweden.

Industrial waste-plan requirements and clean production

Imposition of a legal requirement for a statutory waste plan elaborated by companies that generate over 2000 tonnes waste or over 2 tonnes of hazardous waste (SERI, 2010, p.20).

Potential Impact: The policy measure has the potential to reduce the waste intensity of industries (SERI, 2010, p. 20) and in addition to increase the awareness on waste-related issues. The policy measure would have a positive impact over the waste management practices of companies in general as it requires a deliberate focus on the efficient measures for waste management.

17 European Environmental Agency, Material Use and Resource Efficiency in Europe, 2011
http://www.ier.org.tw/smm/2_MATERIAL_USE_AND_RESOURCE_EFFICIENCY_IN_THE_EU.pdf

18 Swedish Environmental Research Institute(SERI), Effects of policy instruments on waste intensities, 2010, p.15
<http://www3.ivl.se/rapporter/pdf/B1939.pdf>



Quantity-based collection fee – limitation of values

(“Pay as you throw” pricing of waste collection/disposal)

Imposing a fee, assessing the waste collected per household based on residual waste. All waste producers should face at each step in the consumer cycle prices that reflect the cost arising from the production of the additional amount of generated waste¹⁹.

Potential Impact: Where the quantity-based collection fee is introduced, a reduction of 20% of unsorted household waste could be expected²⁰. In addition, additional results as waste prevention and increased source separation, home composting and material recycling might be considered as potential direct outcomes.

Measures for Re-use

- Development of an integrated deposit system, “markets” and networks for effective re-use and repair of materials on local level.
- Setting up of specific targets for re-use of materials in the National Waste Prevention Programme and the municipal Waste Management Plans.
- Setting up of a regulatory framework for eco-design of products, compliant with the targets for reduced generation, re-use and recycling of waste.

Measures for Recycling

- Setting up of a strategic goal of 60% recycling of residual waste to be reached by 2020.
- Employment of sustainable impact indicators, decoupled from GDP, to measure the progress towards the targets realization.
- Priority financing for projects and measures for source separation of recyclable waste.
- Investments in the development of a “recycling market”.
- Ban on the incineration and landfilling of recyclable/compostable materials.

We recommend the setting up of more ambitious targets for recycling in Bulgaria, than the minimum required by the EU legislation as at present, Bulgaria is significantly lagging behind in terms of realization of the “recycling society goal” set in the Thematic Strategy on prevention and recycling of waste²¹. Irrespective of the overall tendency within the EU, observed in the past decade, of an overall increase in the recycling rates and decrease of the amounts of waste landfilling, Bulgaria remains one of the few MSs, in which landfilling remains the primary waste disposal method.

Improvement in the mechanisms for partnership

The actual implementation of the partnership principle as stipulated in Art. 31 of the Waste Framework Directive will require major improvements in the present system of providing information to citizens and citizens’ organization. We require for wider transparency and increased public participation in the process of elaboration of the national strategies, programmes, plans as well as in process of projects selection and implementation.

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19 Eunomia et al, 2009, p.47 <http://www.environ.ie/en/Publications/Environment/Waste/WasteManagement/FileDownload,21596,en.pdf>

20 Swedish Environmental Research Institute(SERI), Effects of policy instruments on waste intensities, 2010, p.15 <http://www3.ivl.se/rapporter/pdf/B1939.pdf>

21 Review of the Thematic Strategy on the Prevention and Recycling of Waste , 22 October 2010