

BULGARIA

An overreliance on outdated and unsafe energy in the name of security

| Public participation | | | Level of ambition | | | |
|--|--------------------------------------|---|--|--|---|------------------|
| Early publication | Independent review | Public consultation | Energy efficiency | Renewable energy sources | Fossil fuels phase-out | Investment needs |
| C | B- | C | C | C | D | D |
| Published in the same time when sent to EC, no Annexes | SEA planned only second half of 2018 | Consultation behind closed door so far, long deadline for submission of comments but no clarity on process of | Not ambitious target, EE for addressing energy poverty is not considered | No increase of RES in energy production in next decade | No plan for coal phase out and plans for expansion of gas lock in | Not assessed |

The draft NECP was made public at the same time that it was presented to the Commission in the middle of January 2019. Meetings with relevant ministries, trade unions and selected stakeholders were held but none were open to the public. An assessment of environmental impacts and consultations with local authorities and relevant stakeholders is planned after the NECP is consulted with the Commission. So although the public has been given ample time for submitting comments (end of April), key information is missing to inform their opinion. Consultation with neighbouring countries is also planned only at a later stage.

The draft NECP is based on only one, business-as-usual energy development. The government plans the misguided strategy of continuing to rely on thermal power plants at Maritza East and the nuclear plants at Kozloduy. A phase-out of coal therefore is not foreseen anytime during the next 60 years, nor nuclear in next 30 years. Energy security is used as the main justification for this scenario, although the coal is responsible for 90 percent of GHG emissions in the energy sector, which is also the most carbon intensive sector of Bulgaria's economy. The Russian nuclear industry is reported as a 'local source' of energy. In addition, the NECP (falsely) points out that there are no fossil fuel subsidies in the country and thus no need for a phase out.

It is not surprise therefore that the NECP lacks clear targets for GHG reductions in ETS sectors and the target for non ETS sectors is zero. For the

transport sector the document admits that while emissions and fuel consumption are growing steadily, emissions reduction targets and the reduction of oil dependency are not clearly pledged nor are sectoral measures set.

At the same time, the uptake of RES is slowing. The transition between 16 per cent in 2020 to 25 per cent in 2030 might look positive, if it were not for the fact that in 2016 Bulgaria already had reached 18.8 per cent RES in final energy consumption. The increase is only planned in the field of renewable heat, while electricity production from RES would stay almost unchanged. Bulgaria has a long list of excuses for stagnation in RES: from being too poor to invest in RES and grids, legislative headaches or the protection of biodiversity. While grid connection for new RES is mentioned as a problem in the electricity chapter of the NECPs, there no projects to address this, but only plans to improve electricity transport from coal power plants.

The main measures to improve energy efficiency is a switch to gas from coal for heating and cooking in households. Investment needs have not so far been assessed and will be prepared only before submission of the final draft, so it appears that this chapter will not be subject to SEA and public consultation.