

Performance Evaluations of
Operational Programme Environment 2014-2020

Activity 3:
Impact assessment of OPE 2014-2020
and the contribution of ESIF support to
achieve the specific objectives
on each priority

Evaluation Report

Ministry of the Environment and Waters

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Introduction

The evaluation of the impact of the Operational Program "Environment" 2014-2020 (OPE) and the contribution of the support from the European Structural and Investment Funds (ESIF) to the achievement of the specific objectives under each priority and carried out by experts of the consortium "Ecosteel", composed of Ecoris South East Europe Ltd. and BIM Consulting Ltd., according to contract D-30-24/01.04.2019 concluded with the Ministry of Environment and Water (MoEW).

The opinion expressed in this report reflects the views of the experts who worked on the evaluation report, and third parties, including the contracting authority, cannot be bound by this opinion.

Summary

The evaluation of the impact of the Operational Program "Environment" 2014-2020 (OPE) and of the contribution of the support from the European Structural and Investment Funds (ESIF) to the achievement of the specific objectives under each priority was carried out in the period March-October 2023.

The implementation of the program from its approval by the European Commission on June 15, 2015 to the middle of 2023 was examined. The data used in the evaluation is as of **30.6.2023**.

The purpose of the evaluation is to establish the contribution of the OPE 2014-2020 to achieving the specific objectives of each investment priority under each priority axis, as well as the impact of the program as a whole on the protection and conservation of the environment and the promotion of the efficient use of resources.

The scope of the evaluation includes the 5 main priority axes - (Water (PA1); Waste (PA2); Natura 2000 and biodiversity (PA3); Reducing the risk of floods and landslides (PA4); and Improving the quality of atmospheric air (PA5); as well as the priority axis for technical assistance (PA6). The evaluation also considers the added in 2022 PA7 to provide support to refugees from Ukraine.

PA8 "Support for small and medium-sized enterprises through the SAFE instrument" added to the program at the end of the evaluation (in September 2023) is not included.

The evaluation includes a total of 17 evaluative questions distributed in the following topics: efficiency (5 questions); efficacy (3 questions); impact (6 questions) and sustainability (3 questions).

Quantitative and qualitative **data collection** methods were used to carry out the evaluation as follows: office study of documents; meetings-interviews, site visits and focus group with the OPE Managing Authority.

In May-June 2023, four online surveys were conducted among OPE beneficiaries: municipalities, WSS operators, state structures; and profit and non-profit legal entities. For all four groups of respondents, more than 50% of those invited responded.

The analyzes were carried out using a combination of methods, depending on the evaluation topics and questions. The main methods used are: intervention logic analysis, indicator analysis, financial performance analysis, descriptive statistics, work process analysis, benchmarking analysis, administrative burden analysis and sustainability analysis. The implementation and achieved results of specific projects (case studies) were also examined. For impact evaluation mainly theoretical approaches (theory of change) were used. Quantitative methods (counterfactual analysis) were used to assess the impact of support in the field of waste (PA2).

The following conclusions were drawn:

Given the specifics and nature of the implemented infrastructure projects, by the middle of 2023 the set goals have been achieved or are close to the goal in the following directions: water bodies with improved monitoring of the chemical status and updated analytical/program/strategic documents in the field of water management; reclaimed landfills; habitats supported to achieve a better degree of conservation; areas with improved flood protection.

Investments under OPE 2014-2020 have a direct positive impact on the implementation of environmental protection policies in the financed sectors: **water, waste, flood and landslide risk prevention and air quality improvement**.

Although the country continues to lag behind in achieving the goals for the collection, treatment and disposal of **urban waste water** (Directive 91/271/EEC), OPE has made a significant contribution to reducing this lagging. A contribution is also observed to the improvement of water supply as well as the improvement of monitoring of water resources and water management.

The program makes a significant contribution to achieving the goals in the field of **waste** in two directions: (1) contributes to the observed trends in the reduction of landfilled household waste and the increase of recycled waste; (2) with the reclamation of landfills for closure, subject to a procedure for violation of EU law in case C-145/14, the program contributes to the fulfillment of the party's obligation according to the decision of the Court of Justice of the European Union from 16.07.2015 and quicker exit from the regime of sanctions paid by the state.

Flood risk management in settlements has been improved and the risk of landslides and collapses has been reduced. In the long term, the measures contribute to climate change adaptation and crisis risk management related to natural disasters.

The impact of measures in the area of reducing **air** pollution with fine particulate matter is still minimal due to the fact that most projects are under implementation. On the other hand, a synergistic effect is expected in some of the target municipalities, as similar projects are also financed through other programs (LIFE).

The program has a limited contribution to protection of **biological diversity**, given the small share of the OPE initially laid down in the National Priority Framework for Action for Natura 2000 to achieve the goals of the Framework. This contribution is hindered and, to some extent, further reduced by the lack of a new management structure of the Natura 2000 network established at national level.

The following **additional effects** have been identified: on the one hand, these are displacement effects in investments in water infrastructure, where environmental benefits lead to aggravation of the financial situation of WSS operators and more expensive services for the population. At the same time, a multiplier effect was identified, in which additional resources were added to the funds from the program by the beneficiaries (WSS operators) for investments in waterworks infrastructure.

The work in an electronic environment (UMIS); flexibility and reaction on the part of the Managing Authority to changes in external conditions; consultations with interested parties and support provided to beneficiaries can be mentioned as **good practices** in the implementation. The Managing Authority has shortened the time for approving project proposals and for verifying requests for funds and is carrying out these activities faster than the statutory deadlines, thereby improving efficiency. A large part of the beneficiaries consider that the administrative burden of awarding a grant is not significant. Good practices implemented by beneficiaries include: proper planning and conduct of procedures under the Public Procurement Law (early start); good coordination with other actors and stakeholders; application of digital technologies to support management and use of project results and application of innovative solutions.

The ESIF contribution to the investments in the OPE-supported sectors is essential, especially in relation to water supply, waste management and air quality improvement, where the invested

funds are significant. In the area of protecting biological diversity and reducing the risk of floods and landslides, ESIF investments are smaller. However, the support is also significant considering the limited budgetary investments.

The **support under OPE 2014-2020 is sustainable** in terms of environmental and climate change policies, as it is linked to European and national strategic objectives. The achieved results of the projects are useful for the beneficiaries and will continue to be needed. The financial sustainability is also generally good.

At the same time, the lack of a clear and generally accepted national legislative and/or strategic vision for the development of some of the sectors subject to intervention (Waters, Natura 2000) has an adverse impact on sustainability. Possible solutions to improve the financial situation of WSS operators, such as savings from various types of costs, will improve the sustainability of investments in water supply and sanitation.

The weaker implementation of some of the set targets is due to the later launch of large and key investments in the water, waste and air sectors, as well as delays in the implementation of the projects. Delays in launching and implementing these measures are mainly due to the lack of readiness on the part of the potential beneficiaries.

A large part of the projects are still under implementation, and some of the WSS projects are planned to be implemented in stages during the next program period. Key interventions contributing to the achievement of program objectives such as the project of the Sofia Municipality for the construction of a cogeneration plant with the utilization of RDF (prolonged appeal procedures) and the investment in capacity building of the new management structures of the Natura 2000 network (non-processing of the submitted draft Law on Amendments and Supplements to the Law on Biological Diversity) have not been implemented.

The execution of **the financial instruments** is far below the expected volumes. According to PA1, only 5 contracts were concluded with WSS operators (out of 14 supported by GA). Within the scope of the PA2 instrument, no support contracts with FIs have been implemented. The difficulties of the beneficiaries in the application of FI under PA1 are related to the large administrative burden, as well as the offer of products that are not attractive enough. Under PA2, financial instruments are not applicable, due to limitations in support and low interest on the part of the designated final recipients. Expanding the scope of support and providing more flexible and attractive conditions to cover needs that are not supported by grants will lead to a better use of financial instruments to achieve the objectives of the program.

In some cases, beneficiaries experience difficulties due to lack of experience and capacity. Other difficulties arise from insufficiently effective communication with stakeholders and target groups as well as from delays arising from regulatory and permitting regimes.

During the implementation period of the program, a number of **external factors** had a negative impact. The COVID 19 pandemic and the war in Ukraine are causing delays, and high inflation in the last two years has made it difficult to complete projects within the budgets. The unstable political environment with several caretaker governments hampers the making of political decisions and the amendment of laws important for the measures supported under the OPE, especially in the field of NATURA 2000 and in the Water sector.

The main limitations in impact evaluation are related to the fact that a large part of the projects are still in progress and the lack of sufficiently reliable data.

The report makes the following recommendations:

- In order to provide more time to manage the risk of delays, the Managing Authority should launch at the beginning of the implementation of the "Environment" Program 2021-2027 all measures, which it is ready to implement. It is recommended to prioritize measures that have a direct contribution to achieving the goals.
- The Managing Authority to analyze the readiness of the beneficiaries to implement measures supporting the achievement of the objectives by drawing up a long list of possible projects, regularly monitoring the level of project readiness and providing technical assistance where necessary to achieve it.
- During the next program period, the Managing Authority, in its agreements with the Fund Manager of Financial Instruments in Bulgaria, should include a clause with the requirement that the financial products be more attractive than those existing on the market.
- It is recommended that support with financial instruments be broader than that with grant financial assistance and ensure coverage of additional needs of the final recipients that contribute to achieving the objectives of the program.
- The OPE Managing Authority should consider the possibilities of gathering additional data from the projects, outside of the program indicators, to serve for the analysis of what has been achieved.

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List of Abbreviations Used

RIA	Road Infrastructure Agency
GA	Grant Agreement
WSS	Water Supply and Sanitation
CLLD	Community Led Local Development
GIS	Geographic Information System
EEA	European Environment Agency
EC	European Commission
EU	European Union
ESIF	European Structural and Investment Funds
BDA	Biological Diversity Act
PPA	Public Procurement Act
WMA	Waste Management Act
ESIFMA	European Structural and Investment Funds Management Act
EEA	Executive Environmental Agency
IAWP	Indicative Annual Work Programs
UMIS	Unified Management Information System
AAQ	Ambient Air Quality
CEWR	Commission for Energy and Water Regulation
C&I	Control and Instrumentation System
MC	Monitoring Committee
MoI	Ministry of the Interior
MoH	Ministry of Health
LAG	Local Action Group
MOEW	Ministry of the Environment and Water
MRDPW	Ministry of Regional Development and Public Works
CM	Council of Ministers
NIMH	National Institute of Metrology and Hydrology
NPFA	National Priority Framework for Action
NWMP	National Waste Management Plan
NNPS	National Nature Protection Service
NSI	National Statistical Institute

EQ	Evaluative Question
OPE	Operational Program "Environment" 2014-2020
OCM	Ordinance of the Council of Ministers
PA	Priority Axis
WWTP	Waste Water Treatment Plant
EMEPA	Enterprise for Management of Environment Protection Activities
RBMP	River Basin Management Plan
FRMP	Flood Risk Management Plan
RIEW	Regional Inspection on Environment and Water
RHI	Regional Health Inspections
DCM	Decision of the Council of Ministers
RFS	Regional Feasibility Studies
SG	Specific Goal
MA	Managing Authority
FI	Financial Instruments
FMFIB	Fund Manager of Financial Instruments in Bulgaria EAD (Fund of Funds)
FPM	Fine Particulate Matter
CCU	Central Coordination Unit
NPLE	Non-Profit Legal Entities
PLE	Profit Legal Entities
NOx	Nitrogen oxides
RDF	Refuse derived fuel

Glossary of terms used

Agglomeration	A territory in which the population and/or economic activities are sufficiently concentrated for the wastewater from the settlement to be collected and taken to a municipal treatment plant or to the final point of discharge.
Biodegradable Waste	All waste suitable for anaerobic or aerobic decomposition, such as food and garden waste, paper and cardboard.
Waste	Mixed waste or separately collected waste from households and other sources, where such waste is similar in nature to household waste, which includes paper and cardboard, glass, metals, plastic, bio-waste, wood, textiles, packaging, waste electrical and electronic equipment, waste batteries and accumulators, as well as bulky waste, including mattresses and furniture.
Type	A group of morphologically similar organisms having a common origin that are potentially capable of exchanging genetic material with each other under natural conditions.
Recovery	Recreation in natural conditions of communities of organisms, ecosystems and complexes and of them by a model of the naturally existing ones or creating conditions for the reemergence or increase in the number of natural populations.
Urban Waste Water	Domestic waste water or a mixture of domestic waste water and industrial waste water and/or storm water.
Landfills for Waste	Waste disposal facilities and separate sites intended for temporary storage of waste for a period longer than one year.
Waste Disposal	A method in which no subsequent waste treatment is envisaged.
People Equivalent (PE)	A quantitative expression of the pollution load of wastewater that equates to the "equivalent" number of persons who would produce waste with the same level of pollution. One PE corresponds to the amount of sewage pollution produced by one resident and represents biodegradable organic substances for which the biochemical oxygen demand for five days is 60 grams per day.
Emission	The direct or indirect release of substances, vibrations, thermal radiation or noise into the atmospheric air, water or soil from organized or unorganized sources within the framework of a given installation or the release of greenhouse gases from aircraft carrying out aviation activities included in the list under Annexes No. 1 and No. 2 of the Climate Change Limitation Act.

Habitat	The area defined by abiotic and biotic factors in which a species resides permanently or temporarily in some of the stages of its life cycle.
Waste Recycling	Any recovery activity whereby waste materials are processed into products, materials or substances for their original purpose or for other purposes
Waste Treatment	Recovery or disposal activities, including preparation before recovery or disposal.
Sediment	Sludge, treated or not, originating from sewage treatment plants.
Sensitive Area	The concept of "sensitive area" was introduced by Directive 91/271/EEC and characterizes a water intake that has or is at risk of reaching a state of eutrophication. This condition is associated with accelerated growth of algae and higher plant species, as a result of which there is an unwanted disturbance in the balance of the organisms present in the water and deterioration of the water quality. Sensitive areas on the territory of Bulgaria are defined by order of the Minister of the Environment and Water.

I. Scope and Objectives of the Evaluation

OPE 2014-2020 is one of the operational programs co-financed by the European Structural and Investment Funds (ESIF) for the Republic of Bulgaria during the 2014-2020 program period.

The program is implemented throughout the territory of the Republic of Bulgaria and is directly linked to the achievement of key environmental protection goals from the Union's strategy for smart, sustainable and inclusive growth - Europe 2020 Strategy. The program is financed with funds from the Cohesion Fund and the European Fund for Regional Development of the European Union, as well as with national funds.

The program is structured in 5 main priority axes (PA): (1) water, (2) waste, (3) biodiversity, (4) flood and landslide prevention; and (5) maintaining clean air. Technical assistance is provided for program management, which is structured in a separate PA6. In 2022, a new axis (PA7) was added to provide support to refugees from Ukraine.

OPE 2014-2020 was approved by the European Commission (EC) in June 2015. In the course of implementation, the program underwent changes, the last change being from September 2023. The changes concern changes in the financial plan for implementation; the implementation schedules of major projects; redistribution of funds between priority axes and funds allocated for financial instruments; introduction of new eligible activities and changes in set indicators. A brief overview of the program changes is presented in Annex 2.

I.1 Scope of the Evaluation

All 7 priority axes of the program are included in the scope of the evaluation. The priority axes and their specific goals (SGs), as well as the allocated funds, are presented in the table below.

Table 1 . Priority Axes and Specific Goals of OPE 2014-2020

Priority Axis	Specific Goal	Budget (BGN)	%
PA 1. Waters	SG1.1 Protection and improvement of the state of water resources; SG1.2 Improving the evaluation of the state of the waters;	1,800,073,847.93	53%
PA 2. Waste	SG2 Reduction of the amount of landfilled household waste;	499,608,598.13	15%
PA 3. Natura 2000 and biodiversity	SG3 Improving the conservation status of species and habitats from the Natura 2000 network;	181,509,113.32	5%
PA 4. Flood and landslide risk prevention and management	SG4.1 Increasing the protection and readiness for an adequate response of the population in case of floods; SG4.2 Increasing the protection of the population from landslide processes;	178,972,767.55	5%
PA5 Improving the quality of atmospheric air	SG5 Reduction of atmospheric air pollution by lowering the amounts of FPM10/NOx;	608,986,065.39	18%

Priority Axis	Specific Goal	Budget (BGN)	%
PA 6. Technical Assistance*	SG6.1 Strengthening the administrative capacity of the responsible structures in order to effectively and efficiently implement the activities related to the programming, management, monitoring, evaluation and control of the OPE 2014-2020;	92,973,318.66	3%
	SG6.2. Raising awareness among the general public of the program and of ESIF's contribution and ensuring transparency and information of practical importance to all identified target groups;		
	SG6.3. Strengthening the capacity of the beneficiaries of the OPE 2014-2020 for the successful implementation of projects under the program.		
PA7 Support for refugees from Ukraine in Bulgaria	SG.7 Providing support to refugees from Ukraine	30,588,236.53	1%
Total		3,392,711,947.51	100%

In September 2023 a new priority axis PA8 has been added. "Support for SMEs through the SAFE instrument". This axis is not included in the scope of the evaluation.

The implementation of the program from its approval by the European Commission on June 15, 2015 to the middle of 2023 was examined. The data in the evaluation is as of **30.6.2023**.

I.2 Description of evaluated interventions

Priority axis 1 "Waters"

The "Waters" priority axis is aimed at collecting, removing and treating waste water in agglomerations with over 10,000 PE. (achieving compliance with [Directive 91/271/EEC](#)), ensuring clean and safe drinking water for the population, as well as improving the water supply network with a view to reducing leaks and water losses ([Directive \(EU\) 2020/2184](#)), completion of water monitoring systems and development of new and updating of existing strategic documents in connection with the implementation of the Water Framework Directive ([Directive 2000/60/EC](#)) and the Marine Strategy Framework Directive ([Directive 2008/56/EC](#)).

Beneficiaries under the priority axis are as follows:

- for the development of Regional Feasibility Studies (RFS) - Ministry of Regional Development and Public Works (MRDPW) and Sofia Municipality;
- for projects identified as priority in the RFS - WSS operators and Sofia Municipality;
- for projects, the implementation of which can start before the adoption of the RFS and for projects of municipalities from the previous period, scheduled for completion;
- for measures related to support for the implementation of the water and sanitation reform - MRDPW;
- MOEW and units within the structure of the ministry, WSS Associations (only for supporting measures).
- Bodies of the State Health Control under the Ministry of Health (for renovation and modernization of the laboratories for the purposes of monitoring drinking water)

Financial Instruments: According to this priority axis, the use of financial instruments to support the WSS operators to cover their own financing during the implementation of the projects is foreseen.

Major Projects: Two major projects are envisaged as follows:

- Integrated water project for Burgas Region
- Integrated project for the water cycle of the city of Vratsa.

The priority axis procedures are presented in Annex 3.

Priority Axis 2 "Waste"

Under this priority axis, measures to improve household waste management are financed, according to the hierarchy for their management: for centers for preparation for re-use, repair and re-use, for recovery with energy production (only for the third phase of an integrated project of the Sofia Municipality), pre-treatment, for the construction of anaerobic and/or composting plants, facilities and equipment for separate collection of biodegradable and green waste, in order to reduce landfilled household waste, demonstration/pilot projects in the field of waste management, as well as introduction of new technologies and organization of information campaigns. The support is expected to contribute to the achievement of national goals to limit the amount of landfilled biodegradable waste by 2020 to 35% of the total amount of the same waste generated in 1995, and to increase the share of recycled waste by the end of 2020 up to not less than 50% of the household waste generated.

With changes to the program since 2019, the scope of the priority axis has been expanded to include support for:

- Projects to improve construction waste management (for reuse centers);
- Landfill reclamation measures. They aim to support the fulfillment of the obligations of the Republic of Bulgaria according to the decision of the Court of Justice of the European Union of 16.07.2015 in case C-145/14 for non-fulfillment of the obligations by the Republic of Bulgaria of Article 14, letters a) to c) from Council Directive 1999/31/EC of 26.04.1999 on waste disposal;
- Pilot projects for the design and implementation of innovative technologies for the separate collection of household waste;
- Pilot projects for recycling plants for separately collected non-biodegradable household waste.

Beneficiaries on the priority axis are: municipalities; profit legal entities; structures/units in the structure of the MOEW; non-profit legal entities - for activities related to the implementation of demonstration/pilot projects.

Financial Instruments: When providing the funds under this priority axis, the use of financial instruments is foreseen. However, these have not been launched and the funds allocated for this purpose have been returned to the program and used for the reclamation of landfills.

Major Projects: A major project is planned for the design and construction of an installation for combined energy production in Sofia with the utilization of RDF - the third phase of an integrated system of facilities for the treatment of household waste of the Sofia Municipality. Due to significant delays due to appeals, the project will not be implemented with OPE support.

The priority axis procedures are presented in Annex 3.

Priority Axis 3 "Natura 2000 and Biodiversity"

This priority axis finances measures for the management, protection, maintenance and restoration of species and habitats in the protected areas of the Natura 2000 network, as well as measures and activities according to the Strategy for Biological Diversity in the Republic of Bulgaria.

Beneficiaries on the priority axis are: structures/units in the MOEW and the Ministry of Agriculture, responsible for the formation, implementation and execution of the policy in the field of Natura 2000 and the policy for ecosystem services, including those responsible for preparing/updating management plans for protected areas and action plans for species; structures/units within the structure of the MOEW, responsible for collecting and maintaining information on the state of species and natural habitats and for reporting it to the EC, as well as for the declaration of protected areas; Natura 2000 management structure; non-profit legal entities, municipalities, scientific institutes.

Financial Instruments: The use of financial instruments is not planned.

Major Projects: No major projects are planned.

The priority axis procedures are presented in Annex 3.

Priority axis 4 "Flood and Landslide Risk Prevention and Management"

This priority axis is aimed at increasing the protection of the population from floods and fulfilling the commitments arising from Directive 2007/60/EU on the evaluation and management of the risk of floods, as well as increasing the protection of the population from landslide processes. Investments are planned in:

- Creation of a National Water Management System in real time;
- Measures to introduce solutions for flood risk prevention and management, incl. ecosystem-based solutions;
- Establishment of 6 centers to increase the preparedness of the population for an adequate response to floods;
- Implementation of studies and assessments in relation to the second Flood Risk Management Plans (FRMPs) for the period 2021-2027;
- Measures aimed at expanding the scope of the system for early warning and notification of the population at the municipal level and modernization of the SEWR of the executive authorities;
- Landslide risk prevention and management measures;
- Implementation of demonstration/pilot projects and information campaigns related to flood and landslide risk prevention and management.

Beneficiaries on the priority axis are: structures/units in the structure of the MOEW; municipalities; Main Directorate "Fire Safety and Protection of the Population" at the Ministry of Internal Affairs; Directorate "Communication and Information Systems" at the Ministry of Internal Affairs, non-profit legal entities.

Financial Instruments: The use of financial instruments is not planned.

Major Projects: No major projects are planned.

The priority axis procedures are presented in Annex 3.

Priority Axis 5 "Improving Ambient Air Quality"

The priority axis supports measures in implementation of the national legislation transposing Directive 2008/50/EC on ambient air quality, as well as with a view to contributing to the achievement of the goals of the Gothenburg Protocol to the Convention on Long-Range Transboundary Air Pollution. Support is provided for:

Review and analysis of municipal programs for Ambient Air Quality (AAQ);

Assisting the competent authorities in the preparation/revision, implementation and control of the municipal programs and development and optimization of the monitoring systems of AAQ;

Measures to reduce the amounts of FPM10 and nitrogen oxides from the main sources of pollution.

Beneficiaries on the priority axis are: structures/units in the MOEW, municipalities with impaired atmospheric air quality, profit and non-profit legal entities.

Financial Instruments: The use of financial instruments is not planned.

Major Projects: Not planned

The priority axis procedures are presented in Annex 3.

Priority axis 6 "Technical Assistance"

The priority axis "Technical Assistance" aims to provide the necessary support for the management and implementation of the OPE 2014-2020, including the completion of the 2007-2013 program period and the preparation of the 2021-2027 program period, activities related to ensuring communication and promotion of the OPE 2014-2020 and activities related to strengthening and increasing the capacity of the beneficiaries.

Beneficiary on the priority axis is the MA of OPE.

The priority axis procedures are presented in Annex 3.

Priority Axis 7 "Support for Refugees from Ukraine in Bulgaria"

Priority Axis 7 has been added to the Operational Program with the amendment of the program from October 2022 in order to provide support for refugees from the Republic of Ukraine in Bulgaria in accordance with Article 98, paragraph 4 of Regulation (EU) No. 1303/2013.

The support is implemented through a measure implemented by the Ministry of Tourism and includes the provision of accommodation, breakfast and a hot lunch.

Beneficiary: Ministry of Tourism.

Financial Instruments: The use of financial instruments is not planned.

Major Projects: Not planned

The priority axis procedures are presented in Annex 3.

I.3 Evaluation Objectives and Evaluative Questions

The purpose of the evaluation is to establish the contribution of the OPE 2014-2020 to the achievement of the specific objectives of each investment priority under each priority axis of

the program, as well as the impact of the program as a whole on the preservation and protection of the environment and the promotion of efficient use of resources.

The evaluation includes a total of 17 evaluative questions distributed in the following topics: efficiency (5 questions); efficacy (3 questions); impact (6 questions) and sustainability (3 questions).

The focus of the evaluation is on **the effectiveness and impact of the program**, but at the same time issues related to **the efficiency of implementation and the sustainability** of the observed results are considered.

The evaluative questions asked also consider the application of **horizontal principles and support with financial instruments** .

II. Methodology used to perform the Evaluation

Different methods of information gathering and analysis were used and combined to carry out the evaluation, as indicated in the figure below:

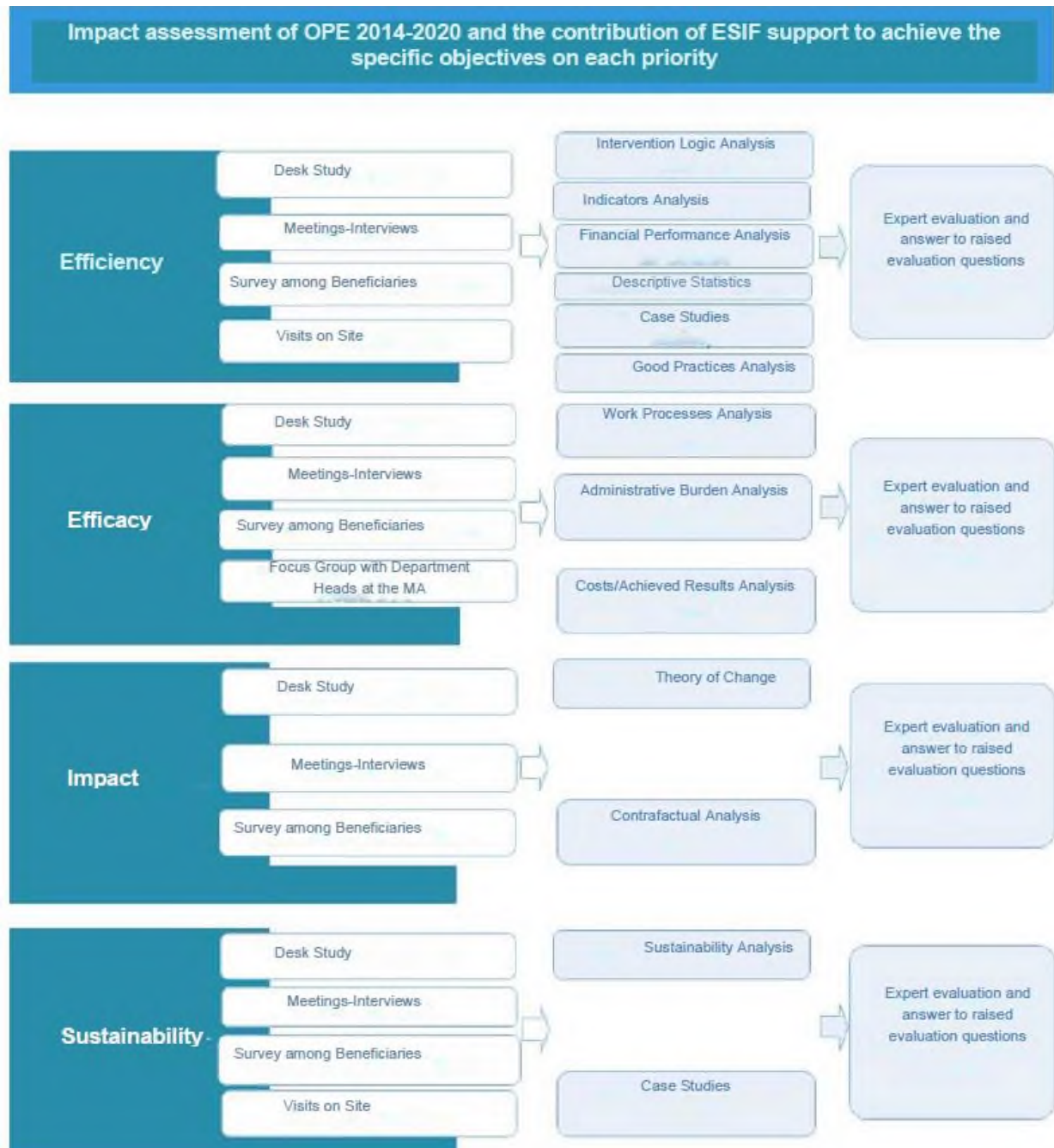


Figure 1 . Evaluation Design

Quantitative and qualitative methods of information gathering and analysis were used to carry out the evaluation as follows: office study of documents; meetings-interviews, site visits, online surveys among program beneficiaries and a focus group with the OPE MA.

Interviews were conducted with key stakeholders. A list of interviewed organizations is presented in Annex 8.

In May-June 2023, four online surveys were conducted among OPE beneficiaries as follows: with municipalities (beneficiaries under PA1, PA2, PA3, PA4 and PA5), with WSS operators (beneficiaries under PA1), with state structures, beneficiaries under PA3; with profit and non-profit legal entities (beneficiaries under PA2 and PA3).

Those invited to take part in the surveys and the responses received are presented in the table below:

Table 2. Participants in Online Surveys

Groups of Online Survey Participants	Invited		Answered Completely		Answered Partially		Total	
	Number		Number	%	Number	%	Number	%
Municipalities	188		102	54%	30	16%	132	70%
WSS Operators	15		9	60%	6	40%	15	100%
Public Institutions	24		19	79%	4	17%	23	96%
Profit and Non-Profit Legal Entities	49		21	43%	7	14%	28	57%
Total	276		151	55%	47	17%	198	72%

The information obtained from the conducted online surveys is presented in Annex 9.

The analyzes were carried out using **a combination of methods**, depending on the evaluation topics and questions. The main methods used are: intervention logic analysis, indicator analysis, financial performance analysis, descriptive statistics, work process analysis, benchmarking analysis, administrative burden analysis, efficiency (cost-outcome) analysis and sustainability analysis.

For impact assessment mainly theoretical approaches (theory of change) were used. Quantitative methods (**counterfactual analysis**) were used to assess the impact of support in the field of waste (PA2).

The implementation and achieved results of specific projects (**case studies**) were also examined (See Annex 10).

Based on the analysis, **conclusions were drawn and recommendations were made.**

Evaluation Limitations

The impact evaluation of the program is limited by the following two main factors:

Impossibility for a sufficiently long observation period: In order for the effects of the interventions to be visible, it is necessary that the projects have ended and a certain period of monitoring their impact has passed. This is particularly important for interventions in the field of waste and clean air, where to account for the effects of reducing municipal waste disposal and reducing air pollution with FPM, it takes time for the relevant changes to occur. At the time of the evaluation, a large part of the projects under the program were still under implementation, making impact reporting in some areas mainly based on projections of expected effects.

Lack of sufficient data and insufficient scope and quality of data: In order to analyze the impact, and especially to report the net effect of the program, data on the status both after and before the end of the projects are needed. Data on pre-intervention status are not always available. Statistical data and analyzes presented in previous reports were mainly used for the evaluation purposes. To carry out the counterfactual study in the field of waste, data on the landfilled household waste by municipality, collected by the EEA, was used, which, however, is incomplete and covers only the period from 2017 to 2021, because according to the Waste Management Act, they are only stored for a period of 5 years. It was not possible to use data for previous years. For a more complete reflection of the achieved results, especially with regard to interventions in the field of waters (such as length of rehabilitated water pipes and sewerage network, number of equipped laboratories and built or renovated monitoring points) to the indicators monitored and reported under the program, it is good to also collect additional project data. Where possible, such data have been used in project descriptions.

III. Answer to the Evaluative Questions

EFFICIENCY

In this section, the effectiveness of the implementation of the OPE 2014-2020 in terms of the results achieved and the implementation of the goals set by the program is examined, as well as an answer given to the 5 evaluation questions asked.

EQ1 What is the effectiveness of the interventions under the OPE 2014-2020, considered as a ratio between the goals set and the results achieved? What is the difference between expected and actual results achieved? To what extent have the planned values of the program result indicators been achieved?

Analyzes on this issue use information on supported investments by priority axes (see Annex 3) as well as progress in achieving the target values of the indicators (see Annex 4). A short answer to the question is given in a box at the beginning of the analyzes on each priority axis.

Priority axis 1 "Waters"

The effectiveness of PA1 interventions is still weak in terms of supporting the construction of water infrastructure and good in improving water management. While the goals set in terms of improving water management are expected to be achieved, due to delays in the implementation of investment projects in the field of water and sanitation and the short time remaining until the end of the year, some of the projects will not be able to be completed and their completion during the next programming period (2021-2027) is being discussed.

PA1 supports interventions in two directions (1) Construction of water supply infrastructure to protect and improve the state of water resources; and (2) support for improving water status evaluation and management.

Investments in water infrastructure are mainly for improving waste water removal and treatment (Directive 91/271/EEC¹). As accompanying measures, the program also supports investments in water supply and reducing water losses. Support is provided through:

- Technical assistance to strengthen capacity and support regional investment planning for water supply and sanitation (WSS) - a total of four projects with the beneficiary being the MRDPW (three projects each) and Sofia Municipality (one project). Three of the projects have been completed and one is still in progress.
- Support for municipalities for the construction of water supply infrastructure - these are projects of municipalities that could not be implemented within the previous program period, or which were ready for implementation: a total of 17 projects.
- Support for WSS operators for the implementation of integrated investments on the territory of consolidated areas served by the relevant WSS operator, according to the

¹Council Directive of 21 May 1991 on urban waste water treatment

[Strategy for the Development and Management of Water Supply and Sewerage](#) . A total of 14 WSS operators and Sofia Municipality are supported.

In addition, through financial instruments, support is provided to WSS operators to cover their own contribution from project financing.

12 investment projects of municipalities have been completed, and five are still in progress. All 14 projects of WSS operators, as well as the project of the Sofia Municipality, are being implemented. Accordingly, the performance indicators still show little progress: 232,157 inhabitants (17% of the target value) have improved access to water supply, and the removed and treated waste water load amounts to 793,970 PE (67% of the planned). At the same time, the contribution of the concluded contracts to these indicators significantly exceeded the set goals - 2,142,957 inhabitants with improved access to water supply (153%) and 2,250,329 PE removed and treated load (190%). 16 of the planned 25 (64%) Wastewater Treatment Plants (WWTP) have been built or renovated.

The support for the construction of infrastructure for the removal and treatment of waste water should have resulted in ensuring that waste water with a pollution load equal to 1.9 million PE is collected and treated in full compliance with applicable legislation. Due to delays in the start-up and implementation of the investment projects, the dropping of the Dobrich water supply project², and the expected completion of parts of some projects in the next period 2021-2027, the set goal has been reduced to 1,180,000 PE. As of June 2023, according to the MA, this goal has been achieved at 34%.

OPE's support for improving water monitoring and management includes the completion and/or optimization of networks for monitoring the quantity of surface water and the chemical composition of groundwater, the purchase of equipment, and the renovation and modernization of the laboratories of the EEA and of the state authorities for health control with new means of measurement. Preparation/updating and implementation of water monitoring and training methodologies are provided as accompanying measures. In addition, support is provided for the preparation of national strategic documents in the field of water management.

Of the 6 projects supported, as of mid-2023, three have been completed. The completion of the quantitative water monitoring networks, the improving the monitoring of the quality of drinking water and the preparation of the river basin management plans (RBMP) for the period 2022-2027 has not yet been finished. At the time of the assessment, the objectives regarding water bodies with improved monitoring of the chemical status have been achieved: 20 new underground water bodies have improved monitoring of the chemical status as a result of the implementation of an EEA project. The indicator for new/updated analytical, program or strategic documents is 85% fulfilled. After the completion of the RBMP projects and completion of the water quantity monitoring networks, it is expected that the set goals will be achieved.

Priority axis 2 "Waste"

Good progress has been made in landfill reclamation, where 52³ of the 57 planned for reclamation landfills have already been reclaimed, and the rest are expected to be completed by the end of 2023. The efficiency in building capacity for separate collection of municipal waste is weaker, as 15 projects are still in progress, of which 5 are risky. The project for the

² The project proposal has not been approved for funding

³55 as of September 2023.

construction of an installation for combined energy production in Sofia will not be implemented under the OPE.

PA2 supports measures that contribute to limiting the amount of landfilled biodegradable waste and increasing the share of separately collected and utilized household waste. With changes to the programme, the scope of the axis has been extended to support the improvement of construction waste management; reclamation of landfills and measures for pilot projects for separate collection of household waste and for recycling plants for separately collected waste other than biodegradable.

In accordance with the axis objectives, support has been provided for:

- Building capacity for separate collection and treatment of household waste - a total of 38 projects
- Construction of an installation for combined energy production in Sofia with utilization of RDF -1 project
- Demonstration projects in the field of waste management – 63 projects
- Reclamation of landfills - 54 projects

In addition, a contract was concluded with FMFIB for the provision of support with financial instruments, but due to lack of interest on the part of potential final recipients and due to the limited scope of the support (see EQ13), the contract was terminated.

22 projects aimed at **building capacity for separate collection and recycling of biodegradable household waste and for pre-treatment of mixed household waste** have been completed, and one of the projects has been terminated⁴. The set goal of building an additional waste recycling capacity of 240,000 tons per year has been met at 41% (98,636 tons per year).

If all contracts in execution are successfully completed, the target is expected to be reached at 96%. At the same time, five projects are at high risk of default. These are four projects for the construction of a composting plant and a pre-treatment plant with the beneficiaries being the municipalities of Botevgrad, Asenovgrad, Gorna Malina and Berkovitsa, as well as one project of the municipality of Ruse for the construction of the anaerobic plant.⁵ If the contribution of risky projects is deducted, the target is most likely to be met at 80%.

Through the built infrastructure, based on the expectations of the beneficiaries, it is planned that a total of 311,203 tons/year of household waste will be diverted from landfill, which is 58% of the goal of reducing the amount of landfilled household waste from 540,000⁶ tons/year.

If the remaining projects in implementation are successfully completed, additional capacity will be created to divert 236,030 tons/year of municipal waste from landfill, which will bring the

⁴ The administrative contract for the implementation of the composting and pre-treatment project of the municipality of Elhovo was terminated in 2022, due to a delay of nearly 3 years, due to a long process of announcing and conducting the tender procedures and subsequent appeal.

⁵ In the event that the project activities are not completed within the eligibility period, the funds for their completion will remain at the expense of the municipalities, and the projects should be completed by 15.02.2026.

⁶ Updated target value with a May 2023 MC decision approved by Decision No. C (2023) 5883 of August 25, 2023 of the European Commission.

result indicator to 547,233 tons/year and the target will be exceeded. If the risky projects mentioned above are taken into account, the target is likely to be achieved at 91%.

The large project of the Sofia Municipality for a plant for combined energy production in Sofia with the utilization of RDF will not be implemented under the 2014-2020 OPE. The freed financial resource has been redirected to a new procedure for the reclamation of landfills for closure, the subject of a procedure for infringement of EU law in case C-145/14 - second⁷.

Good progress has been made in **landfill reclamation**. 49 projects were completed, according to which 52 landfills were rehabilitated - 91% of the planned 57. The rest of the projects are expected to be successfully completed by the end of the year and the so set goal will be achieved.

Priority Axis 3 "Natura 2000 and Biodiversity"

The performance of information measures is good where most projects have been completed. A large part of the measures to improve the environmental protection status of habitats and species are still being implemented, as well as various analyzes and studies. The target for the area of habitats supported to achieve a better level of conservation by June 2023 was achieved at 78%, and that for the area of habitats of species at only 34%. There has been no significant progress in developing the management approach for the Natura 2000 network because the necessary legislative changes have not been adopted.

The support provided under PA3 aims to contribute to the improvement of the conservation status of species and habitats from the Natura 2000 network. The following types of measures are supported:

- Development of a management approach for the Natura 2000 network and for the management of NPFA - one project implemented by the MOEW, Directorate "National Nature Protection Service". Follow-up measures in this direction have not been funded⁸, due to the fact that the proposed legislative changes to the management of the Natura 2000 network have not been adopted.
- Analyzes, studies and plans - a total of 24 projects, including studies of species and natural habitats (1 project), designation and addition of marine protected areas (1 project); preparing/updating species action plans (22 projects)
- Improving the conservation status of natural habitats and species - a total of 51 projects, of which 10 are implemented through the Community-Led Development (CLLD) approach.
- Information campaigns - a total of 21 projects - creation of a shared vision for Natura 2000 (20 projects) and a project of the Directorate "National Nature Protection Service" in the MOEW to increase the awareness of interested parties about the Natura 2000 network.

Of the 24 research, analysis and action plan projects supported, 10 have been completed. According to the EEA project, which aims to collect data on species and natural habitats for the purposes of reporting under Art. 17 of the Habitats Directive and Art. 12 of the Birds Directive, 191 assessments of the conservation status of natural habitats, 452 assessments of the

⁷ Amendment of the program by Decision No. C (2023) 5883 of 25 August 2023 of the European Commission

⁸ Procedure for providing technical assistance to the regional management authorities of the Natura 2000 network

conservation status of species and 455 assessments of the conservation status of birds have been prepared. Relevant monitoring methodologies have been developed and supplemented. Action plans for a total of 15 species have been prepared for nine projects. If successfully completed, the projects in progress will contribute to the development of action plans for the conservation of around 19 more species. The project for the study of marine protected areas (Natura 2000 in the Black Sea) is not expected to be implemented, due to the impossibility of carrying out field studies due to the increased risk of hitting floating mines as a result of the military actions in Ukraine. The project to improve the environmental protection status of steppe natural habitat 62C0 in the protected area BG0000573 Kaliakra Complex through the purchase of land, in which the beneficiary is RIEW - Varna, is planned for phased implementation in the program period 2021-2027. The reasons for this are the late provision of GA (February 2023) and the discontinued public procurement for the provision of legal services.

More than half of the projects to improve the conservation status of natural habitats and species are in progress. The completed 23 projects contributed to the improvement of the nature conservation status of 15 habitats, 10 bird species and 8 other species.

The implementation of the projects led to the achievement of the set goal in terms of the area of habitats of 78% and 34% in terms of the area of habitats of species. If the remaining projects are successfully implemented, the habitat area target is expected to be reached at 87% and the species habitat area target at 58%.

19 projects for regional Natura 2000 information campaigns have been completed. Two projects - one for information campaigns at the national level and one at the regional level - are still in progress. With the successful completion of the project of the Directorate "National Nature Protection Service", the MOEW is expected to reach the set goal of three information campaigns at the national level - the first campaign has already been conducted, the second national campaign is currently being conducted (according to the schedule, it should ended in October 2023).

The set result indicators have not yet been reported as not all projects have been completed. Based on the projects in implementation and their progress, the indicators for species and birds with improved status are expected to be achieved (the status of one species (*Aldrovanda vesiculosa*) and one bird (Black vulture) is expected to improve). There is still no clarity regarding the habitats as the projects are being implemented and they are looking for a complex effect - i.e. for a given habitat type to be considered to be in improved condition, it must cover all areas over which it spreads.

Priority axis 4 "Flood and Landslide Risk Prevention and Management"

Not all goals have been achieved yet in both directions - prevention of the risk of floods and landslides, so there are still projects in progress. Achieving the target in terms of reinforced landslides depends on the successful completion of the Svoge Municipality project, where difficulties are noted. The goal of reducing the population at risk of landslides is likely to be achieved. The goal of reducing the number of areas at risk of flooding has been achieved. The target value for the number of inhabitants benefiting from flood protection measures is also likely to be reached, despite the lower than planned number of supported interventions by municipalities for the rehabilitation of dams and their facilities.

The support under PA4 aims to increase the protection and preparedness of the population in case of floods and landslides. 8 projects in the field of floods and 10 for the prevention of the

risk of landslides were supported. Of these projects, three are implemented by the Ministry of the Interior to establish 6 regional training centers to increase the preparedness of the population in case of floods; technical provision of the activity of the operational teams at the national and regional operational centers; development of a National Disaster Risk Management Plan, as well as a National Information System. Funding has also been provided for the expansion of the system for early warning and notification of the population at the municipal level. The planned six regional centers have been established. The other two projects of the Ministry of the Interior are in the process of implementation. Flood Risk Management Plans (FRMP) are being developed for the period 2022-2027, as well as a pilot system for the Iskar river, part of a National Water Management System in real time. Three municipalities have renovated dam walls and their facilities.

The number of inhabitants benefiting from the implemented flood protection measures is 150,273, which is only 5% of the planned 2,750,000 people. A significant contribution to the achievement of this indicator is expected from the pilot project for the National Water Management System in real time (another 1,300,000 people) and the project of the Ministry of Internal Affairs to expand the system for early warning and notification of the population (650,000). The implementation of the project "Integration, upgrade and optimization of the processes of prevention, preparedness and response to risks coming from nature" of DG FSPF will also contribute to the number of residents who benefit from flood protection measures through an individual indicator for the procedure with 100% coverage of the population of Bulgaria in relation to the specifics of the implemented measures. The result indicator measuring the number of areas with a significant potential risk of floods, in which the population is not ready for an adequate response to floods, is overfilled at 110%. The number of districts has been reduced from 116 to 17.

Of the 10 landslide risk prevention projects supported, 6 have been completed and two more are close to completion and have achieved their targets. According to this project, municipalities and RIA have strengthened existing landslides, and according to a project of the MRDPW, control and measurement systems were built and restored in registered landslide areas for monitoring landslide processes. 32.90 ha of landslides have been strengthened, which is about 41% of the set target of 80 ha. Two contracts are in progress, according to which it is expected that another 64 ha will be strengthened, which will exceed the set goal. But one of the contracts⁹, with a significant contribution of 55 ha, is risky, which puts the achievement of the goal at risk. The result indicator measuring the reduction of the population at risk of landslides by mid-2023 has been met at 33%. According to the completed projects, 73,566 fewer people are at risk of landslides. With the successful completion of the RIA projects (145,813 persons), the set goal will be achieved, regardless of whether the Svoge municipality project (39,061 persons) will be successfully completed.

Priority Axis 5 "Improving Ambient Air Quality"

As of the end of June 2023, the effectiveness of achieving the goals set for the priority axis is small, since the majority of contracts having a real contribution to reducing air pollution are still being implemented. At the same time, if the projects are completed successfully, according to the set project parameters, the objectives of reducing the pollution with FPM10 and the population that will benefit from the improvement of air quality will be achieved.

⁹ To the municipality of Svoge

Under PA5, measures to reduce atmospheric air pollution with fine particulate matter (FPM) and nitrogen oxides (NOx) are supported. Three types of activities are supported:

- Development/updating of municipal programs for atmospheric air quality - a total of 21 projects;
- Creation of an information system for reporting atmospheric air quality data as part of the National Ambient Air Quality (AAQ) Monitoring System in real time - a project of EEA;
- Measures to improve AAQ, by replacing solid fuel heating appliances of citizens with an alternative, more ecological way of heating - 8 projects
- Measures to reduce air pollution from transport – 12 projects

All projects to develop/update municipal programs for ambient air quality have been completed, as well as work on the information system for reporting data on ambient air quality. These measures contribute to the improvement of management for the protection of air cleanliness.

Projects to improve AAQ, by replacing solid fuel heating appliances of citizens with an alternative, more ecological way of heating, are still being implemented.

Of the projects to reduce air pollution from transport, two projects have been completed - those of the municipality of Burgas and the municipality of Haskovo. For the rest of the projects, with the exception of the Ruse municipality, more environmentally friendly vehicles were delivered, which are already in operation. The administrative completion of the projects is expected.

Due to the still small number of completed projects to replace heating appliances with greener ones, progress towards the targets is still weak - 9% progress on the population covered by measures to reduce air pollution. In eight¹⁰ out of 20 concluded contracts for the replacement of heating appliances or measures to reduce the harmful impact of transport (42%), there is real progress towards reducing the amounts of fine particle matter and nitrogen oxides. The project of the municipality of Gorna Oryahovitsa for the replacement of solid fuel heating devices is considered risky, due to the appeal of the public procurements for the implementation of the main activity. The performance of the result indicator - amount of FPM₁₀ is also poor - only 1% progress. At the same time, the goals set for the projects that are being implemented indicate that upon their successful completion, it can be expected that the goals of the priority axis will be achieved. The projects are expected to reduce the amount of FPM by a total of nearly 698 tons/year, which will double the target of reducing FPM pollution by 347 tons/year.

Priority axis 6 "Technical Assistance"

The effectiveness of PA6 interventions is good in both directions of support: strengthening administrative capacity and raising awareness. The set values of the result indicators have been achieved.

Under PA6, support is provided to strengthen the administrative capacity of MAs and beneficiaries under the program and to implement measures to raise awareness. Support is also provided for activities focused on program management and implementation, incl. to "close" the preceding and prepare the following program periods.

¹⁰ Montana, Dimitrovgrad, Sofia Municipality, Vidin, Burgas (2); Haskovo

A total of 2 procedures have been announced on the priority axis¹¹ worth EUR 47,536,502 (100% of the budget). The support is provided through a total of 26 contracts in two main directions: (1) strengthening administrative capacity and (2) raising awareness.

In order to **strengthen the capacity** of the MA, activities for the purchase of technical equipment, providing translations, ensuring the work of the MC on the program, providing external legal and technical expert assistance for the MA, studies and analyzes and evaluations were financed; development of strategic documents; archiving activities; analysis of training needs and conducting and ensuring participation in trainings, workshops, conferences, meetings, visits for exchange of experience in the country and abroad; carrying out on-site inspections; hiring technical staff; and covering the costs of remuneration of the MA experts. Strategic documents, analyses, assessments, opinions related to the implementation of the current program and the preparation and implementation of the 2021-2027 OPE have been prepared.

The reported values of the result indicators indicate that the set goals are being achieved. The average time for approving a project proposal - 44 days against a target of 90 days. The average time to verify a request for funds is 49 days, with a target of 85 days.

Trainings, workshops and information campaigns have been held to **strengthen the capacity of OPE beneficiaries**. Also, information and consultations are provided within the framework of the respective projects.

In support of the beneficiaries, the MA has prepared a document for project contractors regarding frequently made mistakes and violations under the PPA and ESIFMA, which is updated regularly.

According to the information of the MA from completed questionnaires among the conducted trainings, the average degree of satisfaction of the beneficiaries of technical assistance measures and conducted trainings is 94%.

Awareness-raising activities supported include conducting sociological surveys; development and printing of information materials; media monitoring and monthly content analysis; administration of the OPE 2014-2020 website; conducting media information and educational campaigns; conducting informational and/or public events and other activities to promote OPE in implementation of [the National Communication Strategy 2014-2020](#).

Communication activities under the program are carried out on the basis of annual Action Plans in implementation of the national communication strategy. The plans include various types of activities, including activities aimed at informing beneficiaries, public discussions and conducting training workshops/information meetings for beneficiaries for the implementation of projects financed under the OPE.

Among the popular events that are supported by the program are the "[Green Olympics](#)" initiative - a competition for students with an ecological orientation (2021); "Compose a sewage treatment plant" (national drawing competition, realized in 2022), the art project "Residents: in search of a better environment" in six Bulgarian cities - Sofia, Plovdiv, Stara Zagora, Burgas, Varna and Ruse, through which successful projects under OPE 2014-2020 were presented in an attractive way (June 2023).

¹¹BG16M1OP002-6.001 Technical assistance for the Managing Authority of the Operational Program "Environment 2014-2020" and BG16M1OP002-6.002 "Technical assistance for management and implementation of the Operational Program "Environment 2014-2020"

The annual sociological surveys conducted indicate that the level of awareness of the OPE 2014-2020 is very high (80% for 2021 and 73% for 2022).

Priority Axis 7 "Support for Refugees from Ukraine in Bulgaria"

Support has been provided to refugees from Ukraine through the Ministry of Tourism, who have provided those in need with accommodation in hotels and rest centers and covered the costs of their stay.

With the Decision of the EC dated 21.10.2022, an amendment to the program was approved, with which a special priority axis 7 "Support for refugees from Ukraine in Bulgaria" was created in implementation of DCM No. 328/20.05.2022 for approving funds for ensuring cohesion action for refugees in Europe. A new beneficiary has been introduced - the Ministry of Tourism and new eligible measures - provision of accommodation, breakfast and hot lunch. Corresponding performance and result indicators are defined along the axis.

Under PA7, a contract was concluded with the Ministry of Tourism, through which funds were provided to support refugees from Ukraine. At the moment, 100% of the resource on the axis has been agreed, and the paid and verified amounts are 95%. The contract is still in progress. Support reaches 72,300 persons, of which 29,900 are children under 18 years of age .

EQ2 To what extent have the objectives set for each priority been achieved? What is the contribution of ESIF support to achieving the objectives of each priority of OPE 2014-2020?

Priority axis 1 "Waters"

The two specific objectives under PA1 have been partially achieved. The program has made a significant contribution to the country's progress in achieving compliance with urban wastewater treatment requirements, but due to delays in project implementation, the contribution is less than planned. Progress has been made in improving water monitoring and management, but again due to delays in the implementation of key projects, the program's contribution to mid-2023 is lower than expected, although projects are likely to be successfully completed by the end of 2023. ESIF support to the sector is essential due to the significant financial resource, especially in terms of investments in water and sanitation.

In the field of water, OPE pursues two specific goals: SG1.1 *Protection and improvement of the state of water resources* ; and SG1.2 *Improving the evaluation of the state of waters*.

SG1.1 Protection and improvement of the state of water resources

Through SG1.1. the program supports compliance with key EC directives in the field of urban waste water treatment (Directive [91/271/EEC](#)) as well as directives concerning the quality of water for human consumption (Directive 98/83/EC (replaced by [Directive \(EU \) 2020/2184](#)); and Directive 2013/51/EURATOM).

As a result of the investments made under the OPE 2014-2020, by mid-2023, 16 wastewater treatment plants have been built¹². 793,970 PE load is removed and treated; and 232,157 persons have improved water supply.

¹²Aytos, Asenovgrad, Bansko, Varna, Vratsa, Vidin, Dobrich, Elhovo, Pleven, Primorsko, Radnevo, Tervel, Tutrakan, Shumen, Chirpan, Yambol

Investments from OPE under the first specific objective of PA1, based on contracts concluded under the program, amount to nearly BGN 2.7 billion, which is more than half of the funds invested within the program. Of these, ESIF's contribution is about 61% (see the table below), 10% is national co-financing and 31% is the own contribution of WSS operators and municipalities. To cover their own participation, five WSS operators are supported with financial instruments under the program.

For the period 2015-2022 with the funds of EMEPA¹³ and the national budget¹⁴ BGN 462 million were invested. In addition, WSS operators have invested BGN 535 million for the same period¹⁵. Thus, the total investments with national funds and the operators' own investments in the period 2015-2022 equals about BGN 1.1 billion, which is about 72% of the ESIF funds invested. If the national co-financing under the program is also included, the national contribution increases to BGN 1.4 billion.

Table 3. Provided support within the framework of OPE under SG 1 of PA1

Specific Goal	Number of Projects	GA (BGN)		Own Contribution (BGN)	% ESIF Support*
		EU	NF		
SG1.1 Protection and improvement of the state of water resources	36	1,572,929,058	278,973,000	844,634,400	58%

Source: UMIS June 2020; *from the general funding

At the same time, it should be taken into account that the initially allocated resource under PA1 was reduced by 23% from BGN 2.3 to BGN 1.8 billion due to delays in the preparation and implementation of public procurement and the conclusion of contracts for the construction of water infrastructure.

The contribution of OPE to the protection and improvement of the state of water resources through the improvement of water supply systems could have been even greater if all supported projects had been completed within the framework of the programme. Six of the supported projects are expected to be completed in the period 2021-2027¹⁶. According to estimates by the middle of 2023, the value of the grant under these projects, for activities that will not be completed within the framework of the OPE, amounts to about BGN 415 million, which is about 20% of the grant provided under the program for the construction of water and sanitation infrastructure in the period 2014-2020.

SG1.2 Improving the evaluation of the water condition

OPE's contribution to SG1.2 consists of investments to improve water monitoring, planning and management in accordance with the requirements of current European legislation and in

¹³Reports on the activity of the EMEPA:

<https://pudoos.bg/%d0%be%d1%82%d1%87%d0%b5%d1%82%d0%b8/>

¹⁴ Reports on the implementation of the budget according to policies and budget programs of the MOEW:

<https://www.moew.government.bg/bg/ministerstvo/byudjet-i-finansi/otcheti/otcheti-2022-g/>

¹⁵ EWRC reports

¹⁶ WSS Burgas, Sliven, Plovdiv, Varna and Stara Zagora, as well as the project of the Sofia Municipality.

According to data from September 2023, the Stara Zagora WSS project is likely to be completed within the framework of the program.

particular Directive 2000/60/EC¹⁷, Directive 2008/56/EU¹⁸; Directive 98/83/EC¹⁹ (replaced by Directive (EU) 2020/2184) and Directive 2013/51/EURATOM²⁰.

Beneficiaries of the support are state institutions such as the MOEW, the EEA and the Ministry of Health. Through the support provided, environmental assessments of the 2016-2021 RBMP and the Marine Strategy were developed; 9 laboratories of EEA are equipped for monitoring the chemical state of surface waters. The programs for monitoring underground water bodies have been updated and 20 underground water bodies have improved monitoring of their chemical status. New methods have been introduced to determine priority and specific pollutants in water, sediments and biota so that the latter can be monitored, thus fulfilling the requirements of the Water Framework Directive for monitoring all mandatory priority and specific substances as well as obligations for monitoring under the Transnational Monitoring Network within the framework of the Convention for the Protection of the River Danube.

Projects are underway, which are expected to equip 10 laboratories for monitoring the quality of drinking water, build or restore points for monitoring the amount of underground and surface water, as well as develop river basin management plans for the period 2022-2027. Delays in project implementation limit opportunities to improve water evaluation and management.

Support under the program to improve the water status evaluation is essential given that there is no alternative funding for these activities from the state budget or other sources. A 100% grant was provided in the amount of about BGN 57 million, of which 85% (BGN 48 million) are European funds.

Table 4. Provided support within the framework of OPE under SG2 of PA1

Specific Goal	Number of Projects	GA (BGN)		Own Contribution (BGN)	% ESIF Support*
		EU	NF		
SG1.2 Improving the evaluation of the water condition.	6	48,704,726.38	8,594,951.7	0	85%

Source: UMIS 2020

Priority axis 2 "Waste"

The goal of reducing the amount of landfilled household waste by the end of June 2023 has been partially achieved. The contribution of European funding is substantial. The funds invested by the ESIF are about twice as much as the national investment in the field of waste in the same period.

Only one specific goal is set on this priority axis: "*Decreasing the amount of landfilled household waste*".

¹⁷ Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (Water Framework Directive).

¹⁸ Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for Community action in the field of marine policy (Marine Strategy Framework Directive).

¹⁹ Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption

²⁰ Directive 2013/51/Euratom of the Council of October 22, 2013 to determine requirements for the protection of the health of the population with regard to radioactive substances in water intended for human consumption.

PA2 aims to achieve compliance with the waste management hierarchy, according to Directive 2008/98/EC and with the goals laid down in national legislation. To achieve the goal of the program, measures are supported to improve household waste management in accordance with the National Waste Management Plan 2014-2020.

With the support of OPE, as of June 2023, composting installations and installations for the preliminary treatment of household waste have been built for 10 Regional Waste Management Associations (RWMAs) serving 36 municipalities. 12 installations were built for composting separately collected green waste, serving 16 municipalities. In this way, a recycling capacity of 98,636 t/year of waste has been created against a target of 240,000 t/year, which is likely to be achieved at around 80%, i.e. it can be expected that the program will contribute to building a recycling capacity of about 190,000 t/year.

Of the agreed BGN 503²¹ million on the priority axis, a little more than half are aimed at achieving the goal set under PA2 (see the table below). The rest are invested in landfill reclamation.

Table 5. OPE support provided to achieve the specific objective of PA2

Specific Goal	Number of Projects	GA (BGN)		Own Contribution (BGN)	% ESIF Support*
		EU	NF		
Reduction of the amount of landfilled household waste	100*	260,228,019	45,922,592	83,713,394	67%
Reclamation of landfills	54	97,864,933 (52,700,00)**	17,270,283 (9,300,000)**	4,900	85%
Total	154	358,092,952 410,792,000	63,192,875 (72,492,875)	83,718,294	71%

Source: UMIS 2020 under concluded contracts as of June 2023; *with 63 demonstration projects included, without the terminated project for the incinerator for the Sofia Municipality; **second landfill reclamation procedure launched at the end of August

Initially, the pledged funds under PA2 were reduced by about 11% from BGN 563 million to BGN 500 million. The funds invested by the ESIF are about twice as much as the national investments in the field of waste management for the period 2015-2022, which amount to about BGN 246 million (BGN 209 million from the EMEPA and BGN 37 million from the budget of the MOEW)²².

Priority Axis 3 "Natura 2000 and Biodiversity"

A contribution to the improvement of the conservation status of bird species and species is observed. On the basis of the supported projects, it is likely that the goal will also be achieved in terms of habitats (two habitats have an improved nature conservation status), but there is still not enough clarity there, as the projects are being implemented. Due to pending legislative changes, the program has not been able to support the establishment of a new management structure for the Natura 2000 network. Funds on the axis have been reduced by about 9%. Investments under the program represent a small share of funds spent to achieve the goals of the NPFA for the period 2014-2020. ESIF support is substantial compared to

²¹The project for the incinerator of the Sofia Municipality has been excluded.

²²At the same time, OPE is expected to take over the costs of BGN 62 million for reclamation of landfills within the framework: [new OPE procedure from the end of August 2023](#)

budgetary investments, but relatively limited against the background of the contribution of other programs, including those supported by EU funds.

One specific goal is set along the priority axis: *Improving the conservation status of species and habitats from the Natura 2000 network*. Investments under this priority axis are aimed at achieving compliance with Directive 92/43/EEC, Directive 2009/147/EC and the Biodiversity Strategy in the EU 2020 (Objective 1 and 2). Included here are measures and activities according to the National Priority Framework for Action for the Natura 2000 Network (NPFA) and the Strategy for Biological Diversity in the Republic of Bulgaria.

The measures financed by the OPE support the implementation of Objective 1 of the EU Biodiversity Strategy 2020: Comprehensive implementation of the Birds Directive²³ and the Habitats Directive²⁴ and in particular to the following activities mentioned in Objective 1:

- *Activity 1:* Completing the construction of the "Natura 2000" network and ensuring its good management, where measures aimed at completing the construction of Natura 2000 in the marine environment are supported, as well as measures aimed at maintaining and improving the conservation status of species and habitats;
- *Activity 3:* Raising awareness and participation of stakeholders and improving the implementation of the directives, where measures for higher awareness and engagement of interested parties are supported through the implementation of measures from the National Information and Communication Strategy for Natura 2000;
- *Activity 4:* Improvement and streamlining of monitoring and reporting, where measures related to the country's reporting commitments under Art. 17 of Directive 92/43/EEC and Art. 12 of Directive 2009/147/EC are supported.

The priority axis also provides support for measures aimed at Objective 2 "*Conserving and restoring ecosystems and the services and benefits they provide*" of the Biodiversity Strategy.

The specific objective was partially achieved. The implemented measures contribute to raising the awareness and participation of interested parties and improving the implementation of the directives, where measures for higher awareness and engagement of interested parties are supported through the implementation of measures from the National Information and Communication Strategy for Natura 2000.

A contribution to the improvement of the conservation status of bird species and species is also observed. It is not yet clear whether the program will be able to achieve its goal and improve the condition of two types of habitats.

The program fails to support the establishment of a new management structure for the Natura 2000 network and capacity building due to unimplemented legislative changes submitted to the National Assembly as early as March 2020. It also fails to facilitate timely reporting to the EC under Art. 17 of the Habitats Directive (until June 31, 2019) and Art. 12 of the Birds Directive (until 31 December 2019). The country reported in 2022 due to a delay in the implementation of the project supported by the program.

Compared to the necessary financing for the protection of biological diversity, determined in NPFA 2000 for the period 2013-2020, the contribution of OPE is small - about 3% of the

²³Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the protection of wild birds

²⁴Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and wild flora and fauna

estimated needs, amounting to about BGN 3 billion. Additional sources of funding, besides OPE, are the state budget, the Rural Development Program; LIFE program of the EC, Financial mechanisms of the EEA and Norway, territorial cooperation programs, Horizon 2020, Swiss program, etc.

Table 6. OPE support provided to achieve the specific objective of PA3

Specific Goal	Number of Projects	GA (BGN)		Own Contribution (BGN)	% ESIF Support*
		EU	NF		
Improving the conservation status of species and habitats from the Natura 2000 network	97	167,160,302	29,498,887	600	85%

Source: UMIS 2020 under concluded contracts as of June 2023

The funds under PA3 have been reduced compared to those originally allocated in the program from BGN 198 to BGN 181 million, of which BGN 154 million. (85%) are European funding. ESIF's contribution to the financing of measures in the field of biological diversity is significant compared to the investments from the budget. The investments through EMEPA funds in the period 2015-2022 total a little over BGN 5 million²⁵, and the investments from the budget for the implementation of policies and programs in the field of "Preservation, strengthening and restoration of ecosystems, habitats, species and their genetic resources" in the same period are about BGN 61 million.²⁶ To achieve the goals of the NPFA in the period 2014-2020, a total of about BGN 3.9 billion have been invested under various programs and from the state budget.²⁷

Priority axis 4 "Flood and Landslide Risk Prevention and Management"

Despite the progress made and the program's significant contribution to flood and landslide protection, by mid-2023 the targets have been partially achieved. In the area of floods due to limited interest and due to the small number of dam rehabilitation projects managed by municipalities, and in the area of landslides - due to the fact that two projects with a significant contribution are still being implemented, one of which is risky. The contribution of the ESIF, although small, compared to the other priorities, is significant against the background of limited budget funding.

Two specific goals are set under this priority:

- SG 4.1 *Increasing the protection and readiness for an adequate response of the population in case of floods;*
- SG 4.2 *Increasing the protection of the population from landslide processes.*

SG 4.1 has been partially achieved. Technical and administrative disaster and flood response capacity has been established for 99 areas with significant flood risk. The capacity of state structures (MoI) to respond to floods and disasters has been improved. Three dams and their facilities have been rehabilitated, reducing the risk of flooding. At the same time, due to the

²⁵Reports on the activity of the EMEPA:

<https://pudoos.bg/%d0%be%d1%82%d1%87%d0%b5%d1%82%d0%b8/>

²⁶ Reports on the implementation of the budget according to policies and budget programs of the MOEW:

<https://www.moew.government.bg/bg/ministerstvo/byudjet-i-finansi/otcheti/otcheti-2022-g/>

²⁷NPFA 2014-2020 Progress Report

lack of interest on the part of municipalities for investments in improving the infrastructure of dams, the goals set in this regard have only been partially achieved.

Support was provided for the preparation of the FRMP for the period 2022-2027, but due to delays in implementation, the plans were not developed within the established deadlines. The finalization of the 2022-2027 FRMP is very important because in February 2023 the European Commission launched a formal letter of formal notice against Bulgaria for delay in updating its FRMP/Flood Risk Maps as required by Directive 2007/60/EC on flood risk evaluation and management.

SG 2 has also been partially achieved, due to the fact that two projects of (RIA and Svoge Municipality) with a significant contribution are still being implemented. According to the project of the MRDPW, monitoring and measurement systems of landslides (658 ha) have been established to improve the monitoring and management of landslide processes.

The program has a significant financial contribution to the two specific goals given the limited investments from the state budget and municipalities. The ESIF's contribution is significant especially in terms of flood protection (see table below). Investments on the priority axis have been increased by BGN 25 million. (17%) compared to the initially pledged from BGN 131 to BGN 152 million.

Table 7. Support provided under OPE to achieve the specific objectives of PA4

Specific Goal	Number of Projects	GA (BGN)		Own Contribution (BGN)	% ESIF Support*
		EU	NF		
SG 4.1 Increase the protection and readiness for an adequate response of the population in case of floods	8	109,114,424	19,255,486	-	85%
SG 4.2. Increasing the protection of the population from landslide processes	10	41,976,052	7,407,539	28,978,435	54%

Source: UMIS 2020 under concluded contracts as of June 2023

Priority Axis 5 "Improving Ambient Air Quality"

Measures to replace the heating appliances of the population with more ecological ones, which have a direct contribution to reducing air pollution, are still being implemented. The majority of green vehicles in cities have been delivered and put into service, but they have a smaller contribution to reducing air pollution with FPM compared to domestic heating. The financial contribution of ESIF is significant given the limited budget investments in the sector. The budget of the axis has been increased five times compared to the original amount.

Priority Axis 5 pursues one specific objective: *Reduction of atmospheric air pollution by lowering the amounts of FPM10/NOx.*

Of the procedures supported under the priority axis, only two have a direct contribution to this goal - these are the investments in replacing heating devices of citizens with more environmentally friendly ones, as well as the measures to introduce emission-free means of transport in the urban transport of large cities.

As of June 2023, the target has not yet been met as projects to replace heating appliances are in progress. At the same time, in most of the projects aimed at urban transport, new vehicles have already been purchased and put into operation.

ESIF's contribution to reducing air pollution in financial terms is significant and amounts to 74% of the total invested funds under PA5 contracts concluded as of June 2023 (see the table below).

Table 8. OPE support provided to achieve the specific objective of PA5

Specific Purpose	Number of Projects	GA (BGN)		Own Contribution (BGN)	% ESIF Support*
		EU	NF		
Reduction of atmospheric air pollution by lowering the amounts of FPM10/NOx	42	531,240,233	93,748,276	88,708,007	74%

Source: UMIS 2020 under concluded contracts as of June 2023

Municipalities often fail to implement measures set out in air quality management plans due to lack of funding. In the period 2015-2022, about BGN 16 million have been invested with budgetary funds (programs of the MOEW and EMEPA) to improve air quality. While funding, including ESIF funds, for the axis has been significantly increased from BGN 115 million to BGN 609 million, the majority of it (BGN 492 million) is aimed at measures to reduce pollution from urban transport, which have a significantly smaller contribution to the reduction of FPM10 pollution than the measures aimed at domestic heating.

At the same time, OPE's contribution to needs is limited. The estimated funds for the implementation of the investment measures related to domestic heating, specified in the National Program for the Improvement of Ambient Air Quality (2018-2024), are between BGN 857 million and BGN 1.7 billion.

Priority axis 6 Technical assistance

The three specific objectives of PA6 have been achieved. The supported measures have contributed to increasing the administrative capacity of the MA, the program and the beneficiaries. Effective and flexible management of the program is ensured in the conditions of increased risks of an external and internal nature. A high level of awareness of the OPE 2014-2022 has been achieved.

Three specific objectives contribute to the implementation of priority axis 6 "Technical assistance" in the OPE 2014-2020.

SG1 Strengthening the administrative capacity of the responsible structures in order to effectively and efficiently implement the activities related to the programming, management, monitoring, evaluation and control of the OPE 2014-2020

Achieving the goal is supported by activities that build on the established administrative capacity of the MA and the MC. Special attention is paid to activities to reduce the administrative burden.²⁸ The measures taken in this direction are regular provision of training and information to the beneficiaries, as well as ad hoc consultations. Working in UMIS reduces the administrative burden for both the MA and the beneficiaries.

²⁸OPE Technical Assistance Strategic Plan 2014 - 2020

The surveyed and interviewed beneficiaries are satisfied with the quality of the application guidelines (the criteria for administrative eligibility and the eligibility of project proposals are clear) and other acts of the MA, including the feedback maintained with the beneficiaries (potential and implementing projects). Over 70% of respondents to the survey express satisfaction with MA support.

The program also supports measures to limit the turnover of human resources. The preservation of expert potential in DG OPE is ensured thanks to the appropriate use of European funding for financial stimulation, increasing the expert capacity of DG OPE employees and providing external expert assistance. According to the MA, there is no staff turnover and the created administrative capacity has been preserved and upgraded. This finding is also confirmed by a number of interviewed beneficiaries (mostly direct), who have extensive experience with OPE and can make a comparison with the previous program period. Beneficiaries point to the positive fact that for each project they contact a specific coordinator and receive timely and competent assistance on specific implementation issues. Specific cases of demonstrated understanding on the part of the MA and decision-making in the interest of the project are also noted (for example, funds were saved in the process of negotiating supplies and they were left at the beneficiary's disposal for ordering additional equipment).

SG2 Raising awareness among the general public of the program and of ESIF's contribution and ensuring transparency and information of practical importance to all identified target groups.

Increasing transparency and publicity in the management of the operational program and, accordingly, public trust is one of the objectives of PA6. Information activities have been carried out for different audiences by using appropriate communication channels and means.

The study of public needs for information about OPE and the effect of information activities are carried out through media monitoring and content analysis; sociological surveys to measure the effect of the information and publicity measures implemented.

While at the beginning of the program period, the focus of the information and communication activities is on educational and information campaigns to present the objectives of the OPE 2014-2020 and the funding opportunities, at the end of the program period, priority is given to communicating the achievements of the program. Non-traditional approaches have also been used to promote the program, such as the art project "Residents: in search of a better environment". According to it, works of art are positioned and photographed next to sites supported under OPE 2014-2020 (water treatment plants, fortified landslides, etc.).

Special attention is paid to children and students in order to form ecological awareness as a guarantee of sustainability of the measures taken: coloring books with pictures of protected species with the title "It's cool to be eco"; "Green Olympiad" and national drawing competition "Compose a sewage treatment plant" (for students from 4th to 12th grade).

SG3 Strengthening the capacity of the beneficiaries of the OPE for the successful implementation of projects under the program.

The survey conducted among OPE beneficiaries 2014-2022 (see table below) shows a high level of satisfaction with the support provided by the OPE MA - between 50% and nearly 90% of respondents consider the support to be sufficient and timely. Satisfaction is lower only among WSS operators (50%).

Table 9. Participation in training and information campaigns and satisfaction of project executors with the support provided by the MA

Beneficiaries	Municipalities	Public Institutions	NGOs and companies	WSS Operators
Participation in trainings	41%	85%	32%	50%
Participation in information campaigns	25%	25%	27%	30%
Satisfaction with the support provided by the MA	89%	80%	70%	50%

Source: Surveys among program beneficiaries conducted in May-June 2023.

Priority Axis 7 "Support for Refugees from Ukraine in Bulgaria"

The priority axis is likely to achieve its goals. But they are not related to the logic of the intervention and the objectives of the program.

The priority axis aims to provide support to refugees from Ukraine. Such support is provided in the specified parameters.

EQ3 What are the reasons for not meeting targets, if any are identified? Are there external factors that affect performance, what are they and how do they affect (positively/negatively)? What measures are needed to limit the negative influence of external factors?

To a large extent, the weaker implementation of some of the objectives is due to the late start of the measures due to the lack of readiness on the part of the beneficiaries and delays in the implementation of the projects. The main problems of the beneficiaries in the implementation are related to the organization of public procurement, in some cases the lack of experience and capacity, and in the case of infrastructure projects, delays arising from coordination and permitting regimes. External factors that have an adverse impact are the COVID 19 pandemic, the war in Ukraine and an unstable political environment.

Reasons for failure to meet targets

The late start of measures due to lack of readiness on the part of potential beneficiaries

The insufficient willingness of the beneficiaries to present project proposals in 2015 and 2016 are the key reasons for the delay in the implementation of the planned investments in water and sanitation infrastructure, waste and measures to reduce air pollution. The need to carry out additional studies, analyses, prioritization lead to a late start of the procedures in the biodiversity sector. The projects for the construction of composting and pre-treatment of waste installations start in 2017-2018, those of the water supply operators in 2019-2020. The projects for replacing household heating appliances with more environmentally friendly ones, due to the lack of studies and readiness, are divided in two stages - the studies begin in 2019, and the actual activities to replace the heating devices in 2021-2022.

Unrealized planned support

The only one of the 14 projects that receive support under the RFS program, not supported in terms of investments in water supply infrastructure under the OPE is the Dobrich WSS project. The reasons for this are the inclusion in the project of the Albena WWTP, which is not owned

by WSS Dobrich, but by KK Albena, non-removal of the irregularities in the project proposal, as well as the poor financial condition of the company.

In the field of waste (PA2), the major project of the Sofia Municipality to build an installation for combined energy production in Sofia by burning waste has not been implemented. Also, the planned support with financial instruments in the field of waste has not been implemented, due to delays in the structuring of the instrument, due to the narrow scope of support and lack of interest.

In the area of biological diversity protection (PA3), due to non-adoption of the necessary legislative changes, the planned support for building and strengthening a management structure for Natura 2000 has not been provided. In addition, marine protected areas will not be able to be studied due to the impossibility of field studies in the Black Sea due to the military action in Ukraine.

In the field of flood protection measures (PA4), the full potential of support for improving the technical condition of municipal dams and facilities on them has not been realized due to low interest on the part of municipalities and the lack of capacity to implement such measures.

Delays in project implementation

When implementing projects, public procurement procedures are a major factor in the problems and delays in the implementation of projects, both due to their late start and due to violations and appeals. The appeal of the procedures for the selection of contractors or the difficulties in the process of carrying out such procedures are indicated as the main reasons for the difficulties of the beneficiaries, especially in the WSS, where 80% of the WSS companies that participated in the survey indicate that they experience difficulties with the conduct of public procurement.

Although there is a possibility of trading "conditionally" in the funding procedures, public procurement is launched when a GA contract is concluded. This, in the case of large infrastructure projects, leads to a delay in the implementation of the projects by about a year, and in some it happened (upon appeal) for more than a year. In the biodiversity sector, a delay is generated in carrying out the procedures under the environmental legislation, for which the consent of the owner of the land is required. Given the scale of the projects and the diverse ownership of the land (private, municipal, state), identifying the owners and obtaining their consent for the implementation of the activities is extremely time-consuming. Also, a delay can be generated due to the specifics of the projects and the need to consider nesting, flowering periods, etc.

Change in the project implementation environment

Projects in the biodiversity sector, which are planned on the basis of the available information in strategic and planning documents, can be referred to this category. By the time actual implementation on site is reached, very often it turns out that the identified threats and pressures on the target species and habitats have changed or the project implementation environment is already different (water bodies have dried up, bird nests have moved to another location etc.). At the same time, the legislation related to the management of EU funds does not foresee the possibility of flexibility, especially in competitive procedures, in order to adapt the approved project proposals to the new circumstances.

Specific examples are presented in the text blocks below.

Text block 1: Delays in WSS infrastructure projects

Due to the time required for preparation, the projects for the construction of **WSS infrastructure (PA1 "Waters")** started late and are still in progress. Data from the survey show that 7 out of 11 responding WSS companies report a partial delay in the implementation of their project activities (see Annex 9. Online surveys). A large part of construction and supervision orders were announced in the month of March 2020, and contracts with contractors were concluded in late 2020 and in 2021. The late start of implementation does not allow to compensate for other unforeseen delays. In the majority of the contracts of the WSS operators, problems were found with the legal conduct of public procurement. The violations identified by the OPE's MA, EA AEUF and the Audit Chamber lead to significant financial corrections in the amount of BGN 90 million (about 21% of the concluded contracts). In view of the low level of physical implementation of the activities, the WSS projects of Plovdiv, Varna, Burgas, Sliven, Pernik and Stara Zagora have been discussed with the EC offices for completion in the 2021-2027 program period.²⁹

Text block 2: Delays in projects in the Waste sector

Under Priority axis 2 "Waste", the project of the municipality of Ruse for the construction of an anaerobic installation, financed in 2019, will only start in 2023 due to an appeal of the public procurement for the selection of a contractor. In the meantime, the municipality is also appealing a 25% financial correction. The situation is similar with the Municipality of Botevgrad, which has a contract from 2018 for the construction of a composting installation and an installation for preliminary treatment of household waste. After a nearly three-year appeal of the public procurement procedure for the preparation of an investment project and author's supervision, it was restarted in 2021, which led to a significant delay in implementation. The most drastic example is the failure of the large project of the Sofia Municipality - "Design and construction of an installation for combined energy production in Sofia with the utilization of RDF - the third phase of an integrated system of facilities for the treatment of household waste of the Sofia Municipality", for which appeals under the public procurement procedure led to the impossibility of implementing the project.

Text block 3: Delays in Natura 2000 projects

According to **PA3 "Natura 2000 and biodiversity"** due to delays in the implementation of the project *Analyzes and studies of species and natural habitats, subject to reporting under Art. 17 of the Habitats Directive and Art. 12 of the Birds Directive* (due to litigation), it was reported to the EC late under the relevant directives. As the initial data collection was mostly based on literature sources, additional data collection from monitoring and fieldwork was required.

Delays are also noted in the projects for the procedures for improving the nature protection status of natural habitats due to lack of information regarding the ownership of the land on which the measures are implemented and the difficulty of establishing a relationship with the owners. This leads to delays of more than a year in obtaining the necessary EIA and EC opinions.

The lack of experience/capacity of the beneficiaries in the management and implementation of projects financed by ESIF

The analyzes of the MA of OPE 2014-2020, as well as expert assessments made within the projects for the preparation of the RFS³⁰, show that **WSS operators** experience difficulties in

²⁹“Report on the achieved results of the activity of the GD Operational Program Environment, including the status and risk management in the period 01.01.2023 - 06.30.2023.”

³⁰1.001 Supporting the regional investment planning of the water and sanitation sector; 1.003 Support efficiency, management and institutional capacity in connection with the implementation of the reform in the water and sanitation sector; 1.018 Supporting the regional investment planning of the water and sanitation sector - stage 2

planning and implementing their projects due to the lack of OPE experience. The administrative checks in connection with the verification of the incurred expenses at the WSS operators, according to the presented requests for payment, identify omissions on the part of the beneficiaries, leading to exceeding the legally determined percentage limit of categories of expenses. The findings of the MA concern documents and evidence not presented by the beneficiaries, which would give confidence that the expenses were incurred according to the applicable rules.

Often, beneficiaries do not plan their project activities well, mainly due to lack of experience. For example, the need for adequate time and funds to carry out additional but foreseeable activities related to elements of the project (for example, repairs) is not foreseen.

The other group of beneficiaries, some of whom have insufficient capacity to implement projects under the program, are legal entities with economic and non-profit purposes and, in particular, **non-governmental organizations** (NGOs). These beneficiaries have projects under PA2 Waste and PA3 Natura 2000 and biodiversity.

The online surveyed and interviewed representatives of this group point to a number of challenges that they have faced since the process of developing the project proposals. Among the most frequently mentioned are the following:

Poorly planned activities, in time or in scope, such as, for example:

- More activities could have been included in view of the possibilities of the priority axis;
- The territorial scope of some activities could have been larger;
- Citizen participation activities were insufficient;
- Working with local authorities could have been better;
- It was necessary to plan a longer term for obtaining consent from property owners located in the distribution of habitats;
- Communication channels were not optimally used to disseminate project results.
- Project budgets have been unrealistic, a problem compounded by soaring prices;
- Difficulties in the preparation and conduct of public procurement.

Indicative of the weaker capacity of these beneficiaries is the fact that nearly a third of respondents complained of "high administrative burden under OPE and/or bureaucratic procedures beyond their control". NGOs also express a greater need for support from the MA ("the MA to partner and support the implementation process" rather than "emphasizing only its control functions"). Respondents would prefer training rather than sending a manual on management processes, which they consider as self-training.

Lack of free financial resources in NGOs to cover delays in receiving payments from the MA, financial corrections or changes in the project budget

Respondents in the online survey point out that the specificity of NGOs creates difficulties in the financial management of projects. NGOs are not economic operators, thus they do not generate financial income, nor do they possess assets on the basis of which they would be able to establish bank guarantees or take loans. Therefore, it is noted that "the impossibility of using loans from banks or any other pre-financing mechanism hinders the participation of NGOs in the programs."

Specific challenges to the implementation of projects on individual priority axes

This includes a number of difficulties, which are mostly of a subjective nature. Beneficiaries accept them as external factors, but a large part of them could be avoided with better planning of activities and time schedule.

Problems related to structural planning and the design of investment activities

These problems are typical **for investments in water and sanitation under PA1**. During the development of the technical projects, unforeseen circumstances often arise related to archaeological finds (with the Stara Zagora WSS project, for example) or overlapping of routes with projects under other programs. This necessitates a redesign or additional reconciliation procedures. Construction and assembly works are also delayed due to expropriation procedures (Sliven WSS) or incomplete procedures for obtaining the right of passage through public state-owned properties, which are beyond the will and powers of the beneficiary (Plovdiv WSS), etc. Similar are the problems with the lengthy procedures for settling real rights along the route of the investment during the implementation of the project "Integrated project for the water cycle of the city of Vratsa - Phase II" of the municipality of Vratsa. Other unforeseen circumstances are related to "difficult working conditions with high groundwater and frequent breakdowns of old water pipes" and "specific terrain conditions - a large percentage of hard-rock soils".

Such problems are also observed in the construction of **waste treatment infrastructure (PA2)**: In the case of the Kostinbrod municipality project, construction work in the municipality of Svoje was suspended due to an active landslide and the need to relocate a transmission line, after which a redesign of the landslide and relocation of the transmission line was carried out, which delayed the construction.

Restrictions on construction in the Black Sea resorts during the tourist season under the Black Sea Coast Spatial Planning Act are cited as problems, leading to delays in the implementation of projects in this area.

Problems related to the implementation of the CLLD approach

Applying the CLLD approach under PA 3 to support the implementation of conservation measures and national commitments aimed at the protection of a small number of strictly specific species is assessed as not particularly appropriate within the OPE³¹. The implementation of such measures makes it difficult for the beneficiaries, due to the lack of expertise and the fact that the activities are carried out in protected areas. Therefore, the interest of potential beneficiaries is small. The OPE has the smallest relative share (23%) in the CLLD strategies, and the contribution of projects financed through the approach to achieving the objectives of OP 3 is limited³². This is also the evaluation of the Court of Auditors, according to which the insignificant result achieved in the implementation of CLLD strategies with funding from OPE is mainly due to the absence of capacity in the field of biodiversity at the locations³³.

External factors with impact

The main external factors that have a negative impact on the implementation of the program are the restrictions imposed by the COVID-19 pandemic, the change in economic conditions

³¹Annual report of the MA on the implementation of OPE 2014-2021 for 2019.

³²Assessment of the implementation of the OPE through the CLLD, November 2020.

³³Court of Auditors: Audit report No. 0300201119 for the performed audit "Monitoring and evaluation of the approach "Community-led local development" for the period from 01.01.2015 to 31.12.2019."

due to the pandemic, the war in Ukraine and the political crises in the country, which prevent the adoption of management decisions, including changes in legislation, which are essential to the program.

The adverse effect of the above external factors can be summarized as follows:

Restrictions imposed by the COVID-19 pandemic

The COVID-19 pandemic and related restrictive measures are affecting the pace of implementation of OPE 2014-2020 operations.³⁴ The consequences of the pandemic negatively affect the implementation of projects to varying degrees. The restrictive measures in 2020-2021 have made it difficult or thwarted the organization of in-person trainings for beneficiaries, as well as the conduct of mass information campaigns and work with target groups (such as citizens in the projects to replace heating appliances under PA5). In the project to improve the monitoring of the quality of drinking water with the beneficiary MoH (PA1), the regional health inspectorates involved in the activities to improve the capacity of the laboratories of the state health control had difficulties to allocate the necessary time and resources due to the additional workload of controlling the pandemic. For other projects, the pandemic is impacting price spikes and delays in deliveries.

Political instability

The frequent changes of government and management through official offices create conditions of uncertainty in the planning and actions of the state administration. Using actual difficulties in the management of EU funds in order to criticize political opponents is a prerequisite for delayed management decisions. For example, beneficiaries with PA2 projects believe that a two-year delay in the evaluation of project proposals for demonstration projects is due to the crisis in the change of senior management of the MOEW in 2020.

Frequent parliamentary elections since 2021 make it difficult to publicly discuss and adopt strategic and legislative acts that have a direct bearing on the implementation of the OPE 2014-2020. Two such examples are presented in the text blocks below.

Text block 4: Law to amend the Biological Diversity Act (LA of BDA)

The development of the LA of BDA was prompted by the need for a normative introduction of the new approach to the management of the "Natura 2000" network in Bulgaria.

The European Commission has launched infringement procedure 2018/2352 against Bulgaria for failure to comply with the country's obligations under Directive 92/43/EEC for the protection of natural habitats and wild flora and fauna (the Habitats Directive). Detailed findings are also contained in the Audit Report of the Court

³⁴ MA of OPE: Report on the implementation of the OPE 2014-2020 for 2021.

of Auditors from December 2019. According to the analyzes carried out³⁵ it is not possible to solve the problem within the existing legislation. The development of the approach was supported under OPE with a project that ended in 2017. In 2019, a draft of the LA of the BDA was developed, submitted in March 2020 to the National Assembly, but was not considered.

The adoption of the new approach is included as a reform in the National Plan for Recovery and Sustainability. Under the new approach, the obligation to develop territorial plans for network management is introduced. In this way, all protected areas will be managed on the basis of these planning documents. The latest draft of the LA of the BDA of the CM was submitted to the 49th National Assembly on 13.04.2023.

The allocated financial resource under the OPE 2014 - 2020 for financing the construction of the new management structures and the development of management plans for the protected areas has not been utilized as intended.

Text block 5: Draft Water Supply and Sewerage Act (WSSA)

The legal framework in the field of water supply and sanitation has a significant impact on OPE-supported measures for the construction of water infrastructure, both in terms of infrastructure construction and investment sustainability. In 2020, public consultations were held to draft a Water Supply and Sewerage Act in connection with the reforms that will be included in the National Recovery and Resilience Plan. Two years later, in November 2022, the corrected draft of the WSSA prepared by the MRDPW was announced for public discussion. The draft act has been met very critically by municipalities, WSS companies, social partners and other interested parties. The supplemented and partially edited draft act was published for public discussion again in April 2023. The law is expected to implement the following reforms:

- Separation of the regulation of WSS services into an independent entity;
- The introduction of a new price structure for WSS services, based on guaranteeing the minimum costs for using the systems and the required services;
- Regulating the management structure of the sector;
- Clarifying the roles and functions of stakeholders;
- Creation of prerequisites for consolidation in the provision of WSS services.

According to the preliminary impact evaluation of the law, prescribing a clear sequence of planning and implementation of investments, management and maintenance of water supply systems and the provision of services, as well as the relationship between the owners of the infrastructure, the regulatory processes, the ways and sources of financing, will put reliable foundations for the positive development of the industry. With the implementation of the new regulation, all territories in the country will have access to European funding for investment measures related to water and sanitation infrastructure.

It should be noted that since the strategy and design of the OPE are interlinked with important national strategic priorities, the lack of consensus or the delay in the adoption of the relevant strategic documents (as indicated in the biodiversity sector or in the water sector) negatively affects the effectiveness and the impact of the program as a whole. The National Framework for Priority Actions for Natura 2000 (NPPA) 2021-2027, developed with the support of OPE, has not yet been adopted by the Council of Ministers, which will enable the document to be

³⁵The partial preliminary impact evaluation in force from 01.01.2021.

used as a tool for strategic multi-year planning, the measures on which are financed by various European funds and the national budget.

The war in Ukraine

The military action in Ukraine from February 2022 has a multifaceted negative impact, including on the implementation of some projects of the OPE 2014-2020. For example, the project "Natura 2000 in the Black Sea" under PA3 will not be able to fulfill the objective due to risk from carrying out the activities in the Black Sea water area.

Also, the war has led to price increases, difficult logistics in international supplies, negative impact on offers or concluded contracts whose prices turn out to be out of date, as well as an increased administrative burden in checking for ineligibility as participants in public procurement of persons subject to sanctions.

In order to support Ukrainian refugees, a new Priority axis 7 "Support for refugees from Ukraine in Bulgaria" was created, which represents an additional administrative burden for the MA.

Inflationary processes in construction and energy

Due to the significant increase in the prices of construction materials and fuels, some projects report difficulties in implementation within the set budgets. At the national level, OCM No. 290 of 2022 adopted a *Methodology for changing the price of a public procurement contract as a result of inflation* for indexation of contracts to compensate for the increased prices of goods and services. Due to the late adoption of the national methodology³⁶ the annexation of the GA contracts has been delayed, which has a negative impact on the pace of project implementation in 2022. According to the MA, this delay in implementation will be difficult to compensate for in 2023.³⁷

The increase in contract values creates difficulties for some projects where, due to the indexation of the values of the construction contracts, the GA amount would exceed EUR 50 million and the project would pass the "major project" threshold, which would require the approval of the project according to the requirements of (EU) 1303/2013, through a procedure in the EC. This affects the projects of Ruse WSS, Sliven WSS and Shumen WSS and of the Sofia Municipality.

On the other hand, subcontractors also submit a request for indexations. For example, such requests have been submitted by construction companies to 12 WSS operators. The indicative amount of the requested indexation from the construction companies-contractors to the WSS operators is in the total amount of BGN 93,618,093 excluding VAT, which amount also includes the funds that should be provided through self-participation by the WSS companies in their capacity as contracting authorities in the investment process. The WSS companies have also provided the necessary funds to update their self-participation, as they will rely not only on their own free funds, but also on borrowed funds from credit institutions.

Measures to limit the negative influence of external factors

The OPE MA has taken actions to limit and mitigate the negative consequences of various factors on the implementation of the program, including:

³⁶The methodology was adopted on 30.09.2022.

³⁷Report on the achieved results of the activity of the GD Operational Program Environment, including the status and risk management in the period 01.01.2023 - 30.06.2023.

- From the beginning of 2022, an Action Plan has been prepared with set intermediate goals and deadlines for their achievement until the end of 2023, with a view to reporting physical and financial progress on the projects with beneficiary WSS operators. Within the framework of an Agreement with the EIB, the bank provides support to the WSS operators in developing an action plan for each project³⁸. All beneficiaries whose projects are assessed as risky are required to submit an action plan.
- The implementation of some plumbing projects³⁹ will be divided into two stages within the two program periods in case they meet conditions laid down in the Regulation with general provisions⁴⁰ and are in the area of intervention of the new program.
- The released and unused resource is used by redirecting it to new procedures. In the same way, the imposed financial corrections for the projects for the construction of WSS infrastructure (about BGN 90 million) are expected to be redirected to measures under the EC SAFE Instrument (Support for Affordable Energy).

Additional measures that can be considered by the MA to overcome the difficulties that have arisen within the OPE are the following:

- Not to program a resource, or to program the resource under a condition, in case the investments depend on the adoption of legislative changes that are not yet in force.
- Require the beneficiaries of major infrastructure projects to start public procurement with condition, before the conclusion of the GA contracts under the program, to save time and speed up the implementation of the projects (intended for the new programming period 2021-2027).
- In the agreements with FMFIB, a clause should be placed with the requirement that the financial products for support with FIs under OPE should be more attractive than those existing on the market.

EQ4 Were the goals set realistic? If they were not realistic, what should the targets have been (lower or higher)?

The set goals for the priority axes were in most cases realistic. Cases of underestimation of targets are due to a lack of clear forecast for their determination (PA1) or caution (PA2). Such targets have been corrected in due course. Reduction of target values of the indicators was necessary due to partial or complete non-implementation of key projects. In the course of the implementation of the program, some indicators have been changed with a view to specifying or more correctly reporting the contribution of the program.

Priority axis 1 "Waters"

Under this priority axis, ambitious but realistic goals regarding waste water treatment are set, corresponding to the allocated financial resource and the expected investments.

Since the technical parameters of the projects were not known when setting the target values of the program indicators, their clarification at a later stage is understandable. Another challenge to setting target values in the construction of water supply infrastructure is the implementation

³⁸OPE MA report on the performance for 2021

³⁹The WSS projects of Plovdiv, Varna, Burgas, Sliven, Pernik and Stara Zagora

⁴⁰Regulation (EU) 2021/1060

of more than one project for a given agglomeration (for example, a municipality and a regional water supply project), where it is necessary to avoid double reporting.

The indicators related to wastewater treatment are realistic, while the water supply indicator (SO18)⁴¹ was significantly underestimated and subsequently increased by nearly 120% from 220,000 inhabitants with improved water supply to 1,800,000 inhabitants. This is because regional feasibility studies for water and sanitation investments also identify a significant number of interventions that are needed to improve water supply continuity and drinking water quality.

Due to the impossibility of concluding all contracts for the construction of water and sanitation infrastructure within the OPE, some contracts will be completed in the next period, which necessitates a reduction of the set target values of the indicators, including SO18 (see Annex 4).

Priority axis 2 "Waste"

The program's initial targets for both the result indicator and the performance indicator were conservative and well below what was possible given the funds allocated.

The planned waste recycling capacity was set at 105,000 tons/year with a planned budget for the axis of BGN 562 million, while according to the estimates of the National Waste Management Plan, measures worth BGN 287 million are planned to build a recycling capacity of 654,000 t/year.

This necessitates a double increase in the target values of the indicators (see the table below) and a reduction in half of the budget allocated for the purpose .

Table 10. OPE support provided to achieve the specific objective of PA2

Indicators	SO17 Additional waste recycling capacity (ton/year)	2.1. Reduced amount of landfilled household waste (ton/year)
Initial value of the indicator	105,000	285,000
Current value of the indicator	240,000	650,000
Change	129%	89%

Source: OPE and program changes

A target value of the indicator "*Reduced amount of landfilled household waste*" of 650,000 tons was also set in view of the abandoned major project of the Sofia Municipality, which was expected to provide additional capacity for waste recovery.

The objective of procedure BG16M1OP002-2.010-Reclamation of landfills for closure, subject of a procedure for violation of EU law in case C-145/14 (included in 2019) is realistically set, in view of the concluded contracts, the expected resource and the achieved results.

Priority axis 3 Natura 2000 and biodiversity

The set objectives of the performance and result indicators under PA3 are realistic and consistent with the expected limited contribution of the program to achieving the objectives of the NPFA.

⁴¹SO18 "Additional number of inhabitants with access to improved water supply"

Priority axis 4 Flood and landslide risk prevention and management

The implementation of PA4 shows that the set goals were realistic.

The initial strategy of the priority axis relied on significant interest from municipalities to repair and restore dam walls and facilities on them, which is not happening due to the lack of capacity and interest on the part of municipalities.

Priority axis 5 Improving the quality of atmospheric air

The target values of the indicators set under PA5 were cautious, which can be explained by the lack of experience of the MA in supporting this type of measures, but at the same time, to a large extent reasonable given the allocated resource and the uncertainty about the effectiveness of the measures.

Subsequently, after a fivefold increase in the resource under the Priority Axis, mainly aimed at supporting urban transport projects, including new municipalities-direct beneficiaries, based on the expected real contribution from the projects, the values of two of the indicators have been significantly increased as shown in the table below:

Table 11. OPE support provided to achieve the specific objective of PA5

Indicators	Population covered by the measures to reduce the amounts of FPM ₁₀ and NO _x (persons)	Projects aimed at reducing the amounts of FPM ₁₀ and NO _x	Reduction of emissions of FPM ₁₀ (tons/year)
Initial value of the indicator	1,300,000	5	324
Current value of the indicator	3,000,000	19	346.56
Raise	131%	280%	7%

Source: OPE and program changes

The value of the emission reduction indicator has been increased slightly. At the same time, the projects currently being implemented, if successfully completed, are expected to contribute twice as much to the reduction of FPM₁₀ emissions as the target.

Priority axis 6 Technical assistance

The initially set target value of the result indicator under PA6 "Average time for approving a project proposal (number of days)" was not in accordance with the regulatory requirements.⁴² In 2020, the OPE's MC changed the target value of the indicator from 147 days to 90 days in accordance with the regulatory requirements. The data from the implementation of the program indicate that the performance indicators under PA6 have been exceeded, which indicates that the MA could be more ambitious in setting the parameters for the effectiveness of its work, providing for shorter deadlines than those established by law.

⁴²Law on the management of funds from the European Structural and Investment Funds and OCM No. 162 of the CM of 05.07.2016 to determine detailed rules for the provision of grants under the programs financed by the European Structural and Investment Funds for the period 2014 - 2020.

EQ5 What are the examples of good practices and lessons learned that can be derived from the implementation of the OPE 2014-2020? What are the successful projects implemented with the financial support of OPE 2014-2020?

Good practices in the implementation of the program are working in an electronic environment (UMIS); flexibility and response by the MA to changes in external conditions; consultations with interested parties and support provided to beneficiaries. Good practices implemented by beneficiaries include: appropriate planning and implementation of PPA procedures (early start-up and use of framework contracts); good coordination with other actors and stakeholders; application of digital technologies to support management and use of project results and application of innovative solutions.

The main challenges encountered are related to: the lack of capacity of some beneficiaries; insufficiently effective communication with stakeholders and target groups; additional administrative burden when justifying changes in projects and submitting the same documents to UMIS for different purposes; delays in adopting legislative changes affecting support areas.

Based on the collected data, some projects have been studied in depth, with the aim of analyzing the results achieved, outlining good practices and lessons learned. In this regard, successful projects along the various priority axes have been examined (see Annex 10). When determining the projects to be examined in depth, the following indicators were used:

Criterion	Description
Efficiency	The set results and objectives of the project have been achieved within the stipulated time period. The project has achieved (or even exceeded) the set target values of the indicators.
Impact	The implemented project activities contribute to long-term effects on the environment and/or target groups.
Sustainability	The project includes activities aimed at preserving the achieved results and effects over time. A clear approach has been taken to ensure the sustainability and longevity of investments.
Innovation	The project involves a non-standard approach in overcoming a problem or addressing the needs of target groups. Innovation can refer both to the nature of project activities and to the manner of their implementation.

Good practices

As a result of the conducted studies and interviews, a number of practices have been identified that have contributed to the successful implementation of the projects financed by the OPE 2014-2020. The good practices are divided into practices implemented by the Managing Authority and practices implemented by the beneficiaries. Two of the practices applied by the MA are normatively established (working in an electronic environment - UMIS; and consultations (within the MC and the public discussions of the IAWP)). However, they are mentioned because they make a significant contribution to the implementation of the programme.

Good practices implemented by the Managing Authority

- Use and work in an electronic environment (UMIS), as a main means of saving time and resources;
- Flexibility on the part of the MA in case of changes in conditions and external factors (the redistribution of funds, the opening of PA2 and PA3 to new activities, introduction of a simplified form of reporting, etc.);
- Involvement of interested parties in the decision-making process - publication for discussion of the IAWP; discussions and in the MC during the development of the measures and during the evaluation of the projects;
- A systematic approach to communication and providing support from the MA to the beneficiaries - incl. preliminary meetings with the municipalities, beneficiaries in the 6 planning regions, and as a result increasing the quality of the projects, circular letters to the beneficiaries in case of changes and novelties in the guidelines. This has contributed to obtaining information about the achieved results and promptly identifying areas for improvement;
- Provision of technical assistance to assess the quality of the developed projects of the institutional beneficiaries - this practice has contributed to the prevention of errors still at the stage of preparation and, accordingly, the effective implementation of the program;
- Training and sharing of MA experience with the beneficiaries is a practice through which a continuous process of improving the knowledge and skills of the beneficiaries is ensured;
- Resource planning and efficient use of expertise by appointing a specific coordinator for each project;
- Experts from the administration of the managing body exercise continuous monitoring control over the specific project for which they are responsible, so as to react quickly to possible deviations and apply corrective measures;
- In support of the beneficiaries, the MA has prepared a document for project contractors regarding frequently made mistakes and violations under the PPA and ESIFMA, which is updated regularly.
- The specific expertise of the MA employees allows providing the beneficiaries with guidance on specific cases to achieve optimal results.

Good practices implemented by beneficiaries

Positive results of the implementation of the projects are observed as a result of the application of the following approaches, which can be used for good practices in the future and in other programs and projects:

- Preparation and awarding of the PPA procedures at the earliest possible stage - preparation before signing the GA and announcement immediately afterwards (Pirin National Park Directorate, EEA, etc.);
- Use of framework public procurement and mini-procurements when it comes to replacement of equipment on request enables saving delivery time and the successful

- implementation of large-scale projects with multiple end recipients (Sofia Municipality);
- Application of technological solutions such as:
 - database management in order to ensure control and monitoring of the project, including a project information system that contains all project information - details of final recipients, delivery details, inventory numbers, etc. (Sofia Municipality);
 - Use of electronic applications and a digital map in order to track project implementation (Sofia Municipality);
 - Development of a mobile application for the distribution and use of the results of the project (DNP "Pirin", DG "Fire Safety and Protection of the Population", Ministry of the Interior);
 - Intensive work with the contractors on the projects (EEA) and coordination between the responsible institutions within the project (EEA, Basin Directorate and Water Directorate of the MOEW) speed up the implementation of the projects;
 - Inclusion of all settlements on the territory of the RWMA in organized collection and transportation of waste to the installations in order to ensure effectiveness and efficiency of the investment (municipality of Petrich).
 - Increasing the institutional capacity of the beneficiaries - training of employees and the lack of turnover leads to handling the implementation without the help of external administrators and coordinators (MRDPW, RIA);
 - Placement of new facilities on existing sites with the aim of shortening the terms for preparation and coordination under the LoP (municipality of Petrich);
 - Innovative solutions such as organizing campaigns for the handover of green waste against the provision of ready-made compost (Petrich municipality);

Challenges and lessons learned

In the process of researching good practices in the implementation of the program and projects, information was also extracted about the challenges faced by the beneficiaries and the lessons learned as a result. The challenges are summarized below:

Capacity challenges:

- Not all beneficiaries have the capacity to prepare specific technical specifications that require close expertise. Omissions in this aspect lead to errors in the preparation and then the implementation of the projects.
- The local communities applying the CLLD approach do not have the expertise and experience to apply conservation measures;
- A change in project teams and a change of project coordinators leads to difficulties and delays in implementation;
- Insufficient expertise of the beneficiaries in specific topics concerning changes in European and national applicable legislation, such as the regulation on the financial rules applicable to the general budget of the Union, the regulation on the European Regional Development Fund and on the Cohesion Fund, the regulation on provisions of general application, as well as the national legislation derived from them.

Administrative burden challenges:

- Despite the indisputable benefits of UMIS, the system can be used more fully in order to avoid re-uploading documents. Regular review and optimization of operations will help avoid re-entering information and reduce the time for its processing.
- Beneficiaries note the presence of an administrative burden when requiring too detailed and unnecessary, in their opinion, justifications and documents when changing project activities.

Challenges related to lack of or insufficient communication:

- Effective cooperation and communication of the beneficiaries with organizations with which the projects/activities need to be coordinated is not always observed;
- Communication with the public, directly and through the media, before the implementation of projects that raise questions and concerns about the impact on the health of the population and the environment (the project of the Sofia Municipality of the waste incineration plant) needs to be improved.
- WSS operators and municipalities do not always cooperate effectively in order to inform the population about the upcoming works within the settlements.

Efficacy challenges:

- There are numerous cases of extension by the MA of the deadlines for the implementation of contracts with beneficiaries, due to delays in implementation.

Sustainability challenges:

- The lack of a clear and generally accepted national strategic vision for the development of some of the sectors subject to intervention (Water, Natura 2020) has an adverse impact on sustainability.
- The conservation objectives at the level of the protected area for the relevant species and habitat types need to be developed comprehensively at the national level, so that the beneficiaries can develop the relevant measures at the project level.

EFFICIENCY

Efficiency is examined horizontally for the entire program, and where necessary, specifics related to specific priority axes or beneficiaries are highlighted. Efficiency questions mainly address two topics:

- Efficiency of implemented interventions in terms of funds spent and results achieved
- Quality and functioning of management and control systems and design of interventions, especially in terms of administrative burden and lessons learned for subsequent program periods.

EQ6 What is the efficiency of the interventions under the OPE 2014-2020, considered as a ratio between the resources invested and the results achieved?

The evaluation of the efficiency of the invested resources in relation to the achieved results indicates that BGN 1 invested funds for the construction of installations for preliminary treatment and composting of waste provide an additional recycling capacity of about 1.5 kg

waste. The result of investing BGN 1 in the reclamation of old landfills leads to the closure of 0.01 sq. m. When strengthening landslides with BGN 1, we strengthen 1 sq. m of area.

The combined procedure for the design and construction of composting installations and installations for preliminary treatment of household waste is less efficient from the point of view of the achieved result with the invested resource than the procedure for the design and construction of composting installations for biodegradable and green waste. The latter only confirms the importance of continued efforts to increase separate collection.

The ratio between input resources (costs) and achieved results is calculated according to the following general formula:

- Efficiency = Results achieved, calculated using performance indicators/resources input.

Inputs include the costs of project implementation, measured by data on actual disbursements.

The aim is to show how efficiently program resources are used, or in other words how many "results" are achieved for each unit of expenditure.

In order to ensure a level playing field, only completed infrastructure construction projects have been compared. At the time of preparing the assessment, we have data on completed projects that allow to compare and accordingly evaluate the efficiency of the invested resources, only for PA2 Waste and PA4 Prevention and management of the risk of floods and landslides.

According to PA2, projects on the procedures for the design and construction of composting installations and pretreatment installations were compared, and it should be noted that the two types of installations use different technology and treat different types of waste. The comparison is based on the indicator of additional waste recycling capacity in tons per year. In addition, a comparison was made in the efficiency of the funds spent on the procedure for the reclamation of landfills for closure based on the indicator of reclaimed area in hectares.

Information on the effectiveness of the funds spent is summarized in the tables below. The indicators have been converted from tons to kilograms and from hectares to square meters in order to make the numbers easier to understand.

Table 12. Indicators of efficiency of the resources invested in PA2 Waste

PA2/Procedures	Indicator	Result per BGN 1 expenditure
2.002 Combined procedure for the design and construction of composting installations and installations for the preliminary treatment of household waste	Additional waste recycling capacity in kg.	1.51
2.005 Design and construction of composting installations for separately collected green and/or biodegradable waste	Additional waste recycling capacity in kg.	1.64
2.006 Second combined procedure for the design and construction of composting installations and installations for the preliminary treatment of household waste	Additional waste recycling capacity in kg.	0.51
2.010 Reclamation of landfills for closure subject to EU infringement proceedings in case C-145/14	Reclaimed area in sq. m.	0.01

Source: Proprietary calculations on a database for the UMIS 2020 projects

According to procedure 2.002, nearly BGN 36 million were spent on the already completed projects, with which an additional capacity for recycling of slightly more than 54 thousand tons per year was ensured. The average price per ton is BGN 660, but within the procedure there are large differences - from BGN 309 to BGN 2 500 per ton of recycling capacity, which may be due to differences in technology, but is also related to the scale of the installations. Smaller installations are more expensive. Another possible factor for the highest price appears to be the shorter turnaround time – 5 months shorter than the average for the procedure. As can be seen from the comparison, BGN 1 ensures the possibility of recycling 1.5 kg biodegradable waste.

According to procedure 2.005, the amounts actually paid are about BGN 30 million, with which approximately 49,000 tons of recycling capacity per year are secured at an average price per ton of BGN 608. Deviations from the mean varied by up to +/-36%, again with the exception of one of the projects likely due to the shorter implementation time. According to this procedure, with 1 BGN of spent funds, an additional 1.6 kg of waste can be recycled per year.

The comparison of the input efficiency indicators shows, although with a difference within 7%, that the procedure for composting plants for separately collected green and/or biodegradable waste is more efficient than the combined procedure of composting plants and municipal waste pretreatment plants in terms of the result of each resource invested. If we also add the project under the second combined procedure, the difference becomes even greater in favor of the procedure for designing and building composting plants.

Within the framework of the second combined procedure for the design and construction of composting installations and installations for preliminary treatment of household waste (2.006), only one project out of a total of 3 approved ones has been completed. The duration of the project is 35 m., significantly shorter than the average term of the first procedure, and the efficiency of the funds spent is significantly lower - 1 BGN ensures the possibility of recycling 3 times less - half a kg waste compared to that of the first combined procedure. Here the fact should be taken into account that the figures of the first procedure are averaged between a larger number of projects and the price of additional capacity in tons is not actually higher.

Under procedure 2.010, a little over BGN 72 million were spent on the reclamation of 107 hectares of landfills at an average price of BGN 669 thousand per ha. The efficiency of the invested funds is 0.01 sq. m. for every BGN. It is noteworthy that the values that significantly exceed the average are for landfills with an area of less than or slightly above 1 ha., although this does not apply to all landfills of a similar size. MA lays down evaluation criteria based on the cost of reclamation per hectare.

Table 13. Indicators of efficiency of the invested resources under PA4

PA4	Indicator	Result per BGN 1 expenditure
BG16M1OP002-4.003 Prevention and counteraction of landslide processes to limit their risk (including along the republican road network)	reinforced landslides in sq. m.	1.00

Source: Proprietary calculations on a database for the UMIS 2020 projects

According to PA4, only procedure 4.003 was examined, under which there are completed projects. The efficiency of the invested funds is on average 1 sq. m. of reinforced landslides for every BGN spent. The funds actually disbursed under the procedure are a little over BGN 7 million for a total of 705 ha. fortifications. Following the logic of economies of scale, here again

the smallest landslide is the most expensive per ha, although with the smallest absolute value. However, the deviations from the mean values are significant, which may be due to the complexity of reinforcement, which cannot be reflected in the data analysis. In this sense, according to the complexity of the site, there may be differences in values between individual projects, which are reasonably due to differences in the complexity and technology of implementation.

EQ7 What are the main lessons in terms of the design of the interventions and the management and control systems implemented? What improvements are needed to improve the OPE implementation process and ease the administrative burden for beneficiaries? Has there been an increase or easing of the administrative burden for beneficiaries or MAs during the period?

The design of the interventions was generally according to the needs. Expanding the scope of support with the FI would make it possible to cover needs that are not supported with the GA.

A major challenge to implementation is public procurement procedures. The administrative burden is not significant and improvements are being noted in some areas. Only a third of the beneficiaries cited the administrative burden as the reason for the difficulties. The MA has shortened the time for approving project proposals and for verifying requests for funds, which improves efficiency.

Design of interventions

The design of the interventions is discussed in detail within the Activity 1 and Activity 2 reports in the implementation of this contract.

Direct contracting and project selection are appropriate forms of support given the nature of the supported measures and the potential beneficiaries. Direct negotiation is used for potential beneficiaries legally charged with the performance of specific functions.

The design of the interventions is relevant to the needs and with a real contribution to achieving the objectives of the national sector strategy documents.

The programming followed strictly the division made by priority axes. In some cases, complementarity is observed between the interventions on the different priority axes – for example, flood risk reduction (PA4) and water management (PA1). For better efficiency and addressing needs, combined support along more than one axis could also be considered, if possible.

For investments **in water and sanitation infrastructure**, OPE provides support to both municipalities and water and sanitation companies in consolidated areas. In the period 2007-2013, the support was directed only to municipalities, and for the period 2021-2027, in accordance with the strategic approaches for the sector, the support with GA is directed mainly to water and sanitation companies (with the exception of the Sofia Municipality, due to the existing concession). The change in the approach to providing support is conditioned by the lack of technical capacity and expertise in the municipalities and the need for strategic planning and investments in the sector. The municipalities are the owners of the assets, but the water supply and treatment activities are carried out by the WSS operators and the coordination of the works with them is weak, which leads to the construction of infrastructure that is not recognized

by the WSS operators. Investments are fragmented and cannot fully cover and address the needs of the systems.

According to the data indicated in the analyzes of the National Strategy for Management and Development of the Water Sector in the Republic of Bulgaria⁴³, the capacity of most of the studied municipalities is rather insufficient for effective management of the WSS sector. The following main deficiencies were noted: lack of a representative of the municipality in the management bodies of companies with predominant state participation; lack of a specialized unit or own experts who are exclusively involved in the organization and management of the WSS infrastructure - municipal property, and/or with the preparation of the municipality's opinions on the business plans of the WSS company, as well as a lack of complete information about the WSS assets, municipal property, and for the assets of the WSS company in the municipality, which are not municipal property.

In the same analyses, the capacity of the WSSO to develop management functions to the extent of meeting the requirements for current development and survival of the company was assessed as sufficient, while the strategic capacity - as insufficient. The capacity of the companies to carry out investment activity has also been assessed as unsatisfactory.

The analysis of the obtained data shows that the larger WSS companies have specialists with the necessary competencies. However, it is the large operators who consider that they do not have the available capacity to build a new water/sewerage network without hiring external contractors, nor to perform a construction supervision role in the implementation of infrastructure projects in the water sector. The explanation for this is that the investment activities of the large WSS companies are complex and capital-intensive, and their implementation requires qualified personnel and specialized equipment.

Water and sewerage companies make a number of proposals to support their participation in the implementation of infrastructure projects, including: receiving financial assistance and support from third parties; the establishment of units that have the capacity to develop the necessary documentation; implementation of better communication between institutions; change in the regulatory framework. The WSS operators have indicated the need for regulation of construction of infrastructure objects under OPE (water pipes, sewerage and WWTP) with the aim of providing them free of charge to the WSS operators, as well as the transfer of financial commitments from the WSS associations to the WSS companies.

In order to strengthen the capacity of WSS operators under OPE, an analysis of the needs of WSS operators for practical training for financial and accounting reporting of project implementation was carried out⁴⁴ and in October 2021, two practical trainings were held for representatives of water and sanitation operators for financial and accounting reporting under an Agreement with the European Investment Bank (EIB). In 2022, an annex was signed, expanding the scope of the Agreement with the six newly consolidated water and sanitation operators, which have not yet concluded a grant agreement and are in the stage of preparing their regional water projects to apply for financing from the OPE 2021-2027. This assistance will help build capacity for the successful implementation of their projects.

43 <https://www.moew.government.bg/bg/nacionalna-strategiya-za-upravlenie-i-razvitie-na-vodniya-sektor-v-republika-bulgariya/>

44 According to the project "Provision of expert support by the EIB in the implementation of projects for the construction of WSS infrastructure under OPE 2014 - 2020 in the designated territories of WSS operators"

Providing support for some of the needs of the WSS sector, such as digitalization costs, the placement of area metering devices, as well as modeling software for the purpose of simulations and prevention of WSS sector accidents and water losses, can improve the effects and the sustainability of investments. Such investments are suitable to be supported by financial instruments.

Demonstration projects in the field of waste (PA2) have given the opportunity to a wide range of interested parties to implement measures contributing to reduction of deposited household waste. In these projects, partnerships between municipalities and businesses or municipalities and non-governmental organizations contribute to achieving more sustainable results and attracting private funding.

Due to the non-adoption of the Natura 2000 network management approach, the support strategy under OP3 "**Natura 2000 and Biodiversity**" has been modified and opened up to other beneficiaries, so as to ensure the achievement of the objectives. Due to the specificity of the supported activities⁴⁵, the interest at the LAG is low and the contribution of the projects under the CLLD approach to the protection of species and habitats is limited. Implementation of projects in partnership between institutional beneficiaries and beneficiaries from the non-governmental and academic sectors could contribute to ensuring complementarity and specific expertise.

In the "**Floods and Landslides**" sector (PA4), there is little interest on the part of municipalities in participating in prevention activities (especially regarding the rehabilitation of dams), due to a lack of technical readiness and problems with land ownership. Supporting institutional beneficiaries in this sector leads to better results.

The programming of PA5 "**Improving the quality of ambient air**" has been hampered by the lack of a sectoral strategy. Compared to domestic heating measures, support for reducing emissions from public transport has a smaller direct contribution to reducing FMP emissions, and in this regard, measures aimed at reducing household FPM pollution should be prioritized. In order to achieve the set goals, it is necessary to seek a synergistic effect with other measures supported by other sources of funding, as well as to prioritize measures ready for funding.

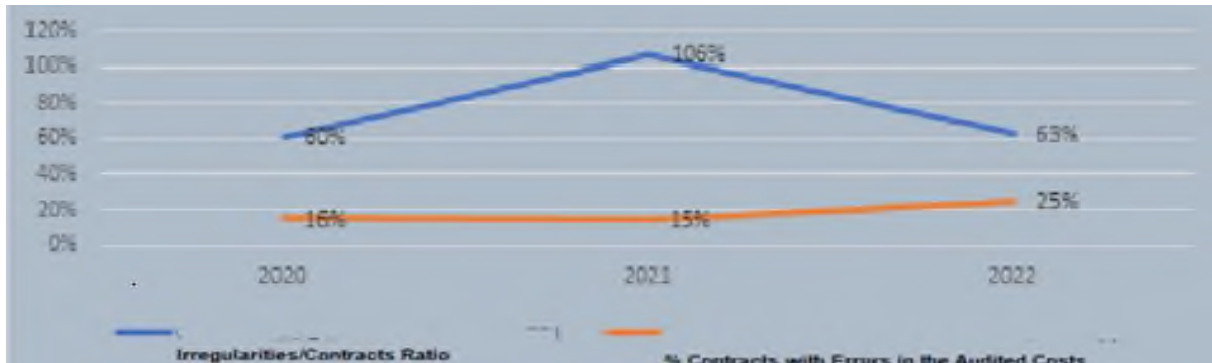
The experience of the current program period shows that in some cases the implementation of measures in partnership can solve problems associated with the provision of specific expertise, as well as lead to better sustainability of results through the involvement of key stakeholders. Therefore, it's suitable for the MA to stimulate partnerships in this type of intervention. This can be done by placing an administrative requirement in relation to specific beneficiaries, or by providing more points in the technical evaluation of project proposals in competitive selection procedures.

Management and control systems

The OPE MA uses a single systematic approach to ex post legality checks and applies detailed checklists covering all risk points, according to the Guidelines for determining financial corrections that apply to EU-funded expenditure under shared management. The approach used by the OPE MA in carrying out subsequent control for legality and in determining the financial impact of violations is entirely borrowed from and in accordance with that of the audit body Executive Agency "Audit of European Union Funds".

⁴⁵ conservation measures aimed at strictly specific species, the majority of which inhabit habitats limited in area, subject to conservation in protected areas

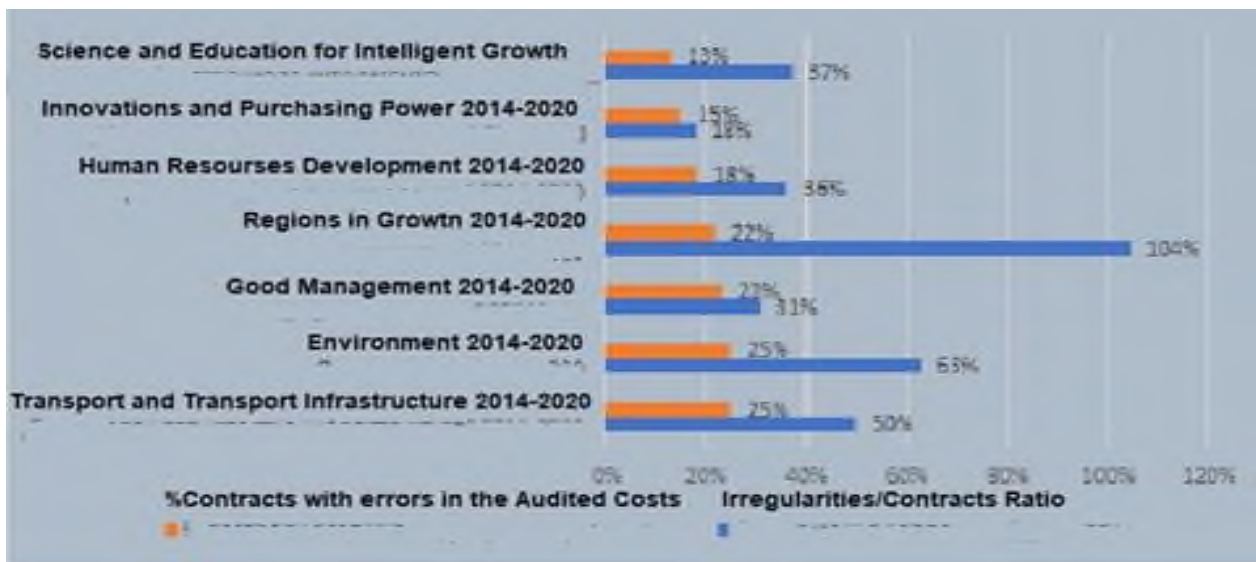
From the data in reports of the EA "Audit of EU funds" for the last three years, it is clear that the number of irregularities in the audited contracts and the number of contracts with errors in the audited expenditure⁴⁶ have risen from 2020 to 2022 (see figure below).



Source: Own calculations based on data from reports of the EA "Audit of EU funds" with an analysis of the errors found in the audit activity for 2020, 2021, 2022.

Figure 2 . Trend in identified irregularities and errors in contracts for the implementation of projects financed by the OPE 2014-2020.

In the period 2014-2020, OPE is in second place in terms of the ratio of irregularities to the total number of contracts after the Operational Program "Regional Development" and in first place together with the Operational Program "Transport and Transport Infrastructure" in terms of the share of contracts with an error in the audited costs⁴⁷ (see next figure).



Source: Reports of the EA "Audit of EU funds" with an analysis of the errors identified in the audit activity for 2022 <https://aeuf.minfin.bg/bg/25>

Figure 3 . Ratio of audited contract irregularities to total number of contracts and ratio of procurement contracts with audited cost errors to total number of contracts under different programs for 2022.

⁴⁶An error in the audited expenditure is found for violations that were not detected by the Managing Authorities in the expenditure verification process in 2020 and 2021

⁴⁷ according to aggregated data on the types of errors in projects financed by the various operational programs audited in 2022 by the AEUF

As a result of a re-check for legality in connection with the findings and recommendations of the Executive Agency "Audit of European Union Funds", a resource was released from the imposed additional financial corrections in the amount of about EUR 72 million, from the Cohesion Fund and about EUR 48 million from the ERDF, which respectively represent 2.78% of the budget of the funds under the OPE 2014-2020 from the CF and 5.97% of that of the planned funds under the program from the ERDF.

According to data from UMIS, the total number of contracts for projects financed under OPE 2014-2020 is 389, and only 33 of them do not have imposed financial corrections, which represents 8% of all projects. Or in other words, 92% of all projects have imposed financial corrections.

Despite the high rate of financial corrections, beneficiaries share that in many cases, in order to avoid financial corrections, they make compromises with the choice of contractors by defining selection criteria that are too general, in order not to be accused of defining restrictive/discriminatory conditions. The problem is significant when it comes to choosing specialized equipment and the beneficiary knows exactly what he needs.

Improving performance and easing the administrative burden

The OPE MA is efficient in terms of average time for approving a project proposal and average time for verification of a request for funds, performing these activities in shorter than statutory terms: respectively 44 days (with a statutory requirement of 90 days) and 49 days (with a statutory requirement of 85 days).

Administrative burden was not cited as the main cause of difficulties in achieving project objectives. However, the significant difference between the opinion of the municipalities and that of the other beneficiaries should be noted. While just over 8% of the municipal beneficiaries under OPE define the administrative burden as the main reason for their difficulties, about 33% of the other beneficiaries consider this to be the case, including WSS operators, NPLE, PLE and public institutions (see figure below).



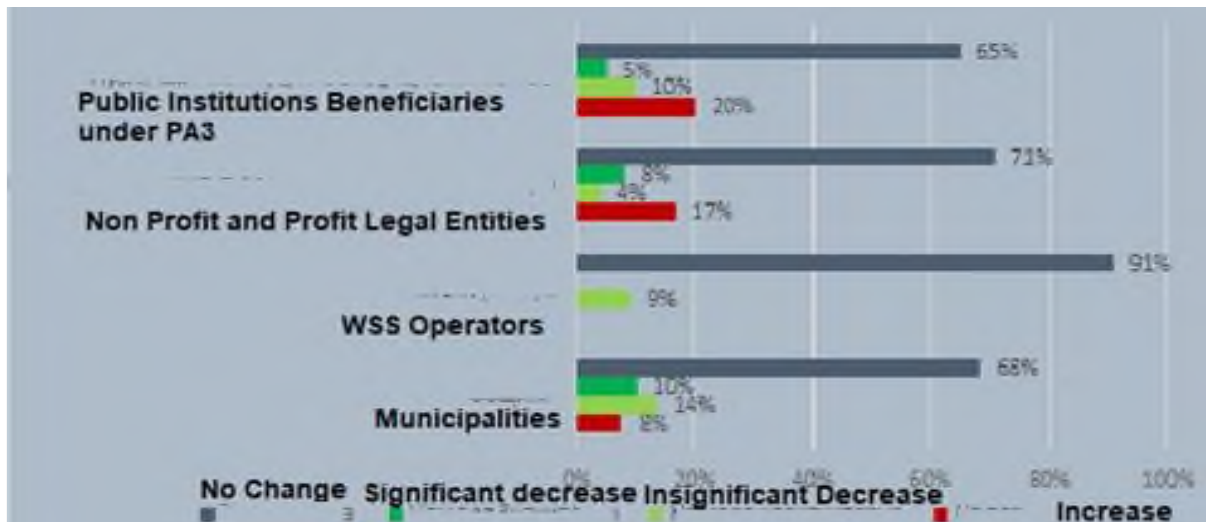
Source: Conducted questionnaire surveys among program beneficiaries for evaluation purposes

Figure 4. Share of the beneficiaries having indicated the administrative burden as the reason for their difficulties

Within the scope of the research, a question was asked among the beneficiaries, "How would you rate the change in the administrative burden during the implementation of the project at the beginning of the project and at the present moment?", which aims to find out how the beneficiaries feel about the change in the level of the administrative burden at the beginning of the implementation and at the end.

As can be seen from the responses illustrated in Figure 5, the majority of beneficiaries do not see a change in the administrative burden. However, it should be noted that the largest part of

the beneficiaries, according to whom there is a change in the direction of an increase in the burden, are representatives of the NPLE and PLE, and the largest part of the beneficiaries, according to whom the burden has decreased, are municipalities. The explanation for this may be the difference in the experience of different types of program beneficiaries. For example, municipalities have extensive experience in the implementation of projects financed under OPE, while beneficiaries such as water and sanitation operators, who were not eligible in the previous period and have no experience in preparation and implementation, estimate the administrative burden at the same level at the beginning and end of the projects.



Source: Conducted questionnaire surveys among program beneficiaries for evaluation purposes

Figure 5. Assessment by the beneficiaries of the change in administrative burden during the implementation of the projects

According to the beneficiaries who report a reduction in the administrative burden, this is due to the reporting of the project through UMIS. According to them, the system enables fully electronic reporting, systematization and processing of data and rapid exchange of information. As a result, there is traceability of events, very good communication with the technical and financial expert, as well as clear instructions. At the same time, the beneficiaries give specific recommendations for further improvements to the work with UMIS, such as the use in UMIS of documents uploaded in previous packages of reporting documents (RDP), but they have not communicated them to the MA. This probably means that not all beneficiaries are informed about the possibility to give recommendations for the optimization of the UMIS.

According to some beneficiaries, the processing of additional agreements to the administrative contracts for grant agreements based on a template in Word creates an additional administrative burden and prerequisites for errors and inaccuracies when filling in the information, while UMIS already allows it to be prepared electronically. The recommendation to the OPE MA is to update the beneficiary manual in this part in order to drop the Word format. In this regard, it is good to make a regular review of the optimization of the UMIS and to take steps to promptly update the Manual of the MA and drop the documents required by the beneficiaries that are generated in the UMIS.

The main reason for the administrative burden, according to other beneficiaries, is the repeated conduct of procedures for subsequent control over the same procedures for the selection of public procurement contractors under the project and the imposition of repeated financial corrections at the end of the program period in amounts significantly exceeding the beneficiary's ability to provide a financial resource (even temporary until a decision of a competent court).

IMPACT

EQ8. What is the impact (considered as the change that can reasonably be attributed to the program) of the implementation of the OPE 2014-2020 for the preservation and protection of the environment and the promotion of the effective use of resources in Bulgaria according to each priority of the program?

Priority investments of OPE 2014-2020 have a direct positive impact on the formation and implementation of environmental protection policies in the supported sectors.

The program is expected to make a significant contribution to the achievement of the objectives defined in Directive 91/271/EEC on **the treatment of waste water from settlements**. It also contributes to improving the monitoring of water resources and improving water management.

The program makes a significant contribution to achieving the goals in the field of waste in two directions: (1) contributes to the observed trends in the reduction of landfilled household waste and the increase of recycled waste; (2) with the reclamation of landfills for closure, subject to a procedure for violation of EU law in case C-145/14, the program contributes to the fulfillment of the party's obligation according to the decision of the Court of Justice of the European Union from 16.07.2015.

The program has a limited contribution to **the protection of biological diversity**, given the small share of OPE for achieving the goals of the NPFA. This contribution is hindered and, to some extent, reduced by the lack of a new management structure of the Natura 2000 network.

The prevention and **management of the risk of flooding** in populated areas and **the reduction of the risks of landslides and collapses** have been improved. In the long term, the measures contribute to climate change adaptation and crisis risk management related to natural disasters.

The impact of the measures in the area of **reducing air pollution** by FPM and nitrogen oxides is minimal due to the fact that most projects are under implementation.

Water sector

Protection and improvement of the state of water resources

The impact of the program on improving the state of the waters, through the construction of the WSS infrastructure and the removal and treatment of waste water, is significant, as it is determined by investments in the construction/finishing of the WSS infrastructure - in agglomerations with over 10,000 PE; supporting the regional investment planning of the water supply sector and support for increasing the institutional capacity for reform in the water supply sector.

The NSI and EWRC data on **the quality indicators of WSS services** in the period 2014-2020 point to a sustainable trend in the improvement of water supply, sewage and water treatment services, to which the program has made a significant contribution.

Impact on waste water removal and treatment:

During the period 2014-2021, the sewerage network was expanded and modernized and the share of treated wastewater increased, as can be seen from the table below.

Table 14. Sewerage and wastewater treatment - main indicators

Indicators	2014	2021	Change
Public sewer network in total for the country (km)	10518	12831	2313
Main sewage collectors (km)	1852	1952	100
Distribution sewer network (km)	8666	10879	2213
Level of coverage with waste water disposal services (%)	68.53	73.02	4.49
Level of coverage with wastewater treatment services (%)	59.13*	63.15	4.02
Residential WWTPs, total number	89	176	87
Population connected to WWTP, %	56.8	66.8	10
Including: WWTP with a capacity of over 2000 PE	70	115	45

Source: NSI and EWRC annual reports * the data are for 2017.

Out of 87 new WWTPs built, of which 45 with a capacity of over 2000 PE – 16 were realized with support under OPE. Measures for the collection, removal and treatment of waste water, in the context of the rehabilitation of the existing infrastructure, contribute to the achievement of the objectives set out in Directive 91/271/EEC on the treatment of urban waste water.

The data from the technical reports assessing the compliance of the member countries with the requirements of the urban waste water treatment directive show significant progress for the country in recent years in terms of waste water removal and treatment (see the table below), for which the OPE has substantial contribution.

Table 15. Compliance with Directive 91/271/EEC

Year	Criteria Wastewater disposal (Art.3)	Wastewater treatment (Art.4)	Removal of N and P when discharged into sensitive areas (Art.5)
2014	26%	20%	17%
2016	51%	38%	22%
2018	90%	42%	27%

Source: Technical reports on the implementation of the urban waste water treatment directive⁴⁸

Impact on water supply improvement

The realized and expected results of the projects have a positive long-term effect on the efficiency of water supply networks and reduction of water losses. In the period 2014-2021, 927 km of new water supply network were built and 4,179 km were rehabilitated (see table below). Losses of supplied water will decrease by 3 % in 2021 compared to 2014 (from 58% to 55%), and this percentage is proportional to a decrease in real water losses during transportation (-2%).

⁴⁸ [9th Technical assessment of information on the implementation of Council Directive 91-271-EEC](#); [10th technical assessment on the Urban Waste Water Treatment Directive \(UWWTD\) implementation 2016](#); [11th technical assessment on UWWTD implementation](#)

Table 16. Water supply - main indicators

Indicators	2014	2021	Change
Public water supply network (km)	73,515	76,651	3,136
Newly constructed water supply network in the period 2014-2021 (km)			972
Total water losses (%)	58%	55%	-3%
Rehabilitated water supply network in the period 2014-2021 (km)			4,179
Real losses (when transporting water) (%)	49%	47%	-2%

Source: NSI; own calculations based on NSI data

Despite the significant resource invested under the programme, the OPE cannot cover all the needs in the sector. According to estimates set out in [the National Investment Plan for Water Supply and Sanitation](#) (2021), to achieve compliance with the requirements of the Urban Wastewater Treatment Directive, approximately BGN 6 billion more will be needed, and to achieve compliance with the requirements of the Drinking Water Directive, another BGN 7 billion.

At the same time, expected changes in European legislation place new, stricter requirements both on the disposal and treatment of waste water and on the quality of drinking water, which pose new challenges to the sector^{49,50}. The proposal for amendments to the Wastewater Treatment Directive sets a schedule for the implementation of the main measures from 2025 to 2040, with all agglomerations over 1,000 PEs having to comply with the requirements by 2030.

Improving the evaluation of the state of the waters

The existing networks for monitoring the quantity of surface and underground water are insufficient, which reflects on compliance with the requirements of the Framework Directive. This makes the existing monitoring partial or insufficient to fully cover the requirements of the Framework Directive. As a result of OPE support, 173 water bodies have improved chemical status monitoring and 90 have improved quantitative status monitoring.

Despite the results achieved under OPE 2014-2020, additional measures will be needed to fulfill the growing requirements of European legislation. The proposal to amend Directives 2000/60/EC, 2006/118/EC and 2008/105/EC includes new standards for a number of chemicals.

By renovating and modernizing the laboratories of the bodies of the State Health Control (RHIs)⁵¹ monitoring of drinking water quality by volume and frequency is provided in

⁴⁹Proposal for a Directive of the European Parliament and of the Council on urban waste water treatment (<https://eur-lex.europa.eu/legal-content/BG/TXT/HTML/?uri=CELEX:52022PC0541>)

⁵⁰Proposal for a Directive of the European Parliament and of the Council amending Directive 2000/60/EC establishing a framework for Community action in the field of water policy, Directive 2006/118/EC on the protection of groundwater against pollution and deterioration and Directive 2008/105/EC on setting environmental quality standards in the field of water policy (<https://eur-lex.europa.eu/legal-content/BG/TXT/HTML/?uri=CELEX:52022PC0540>)

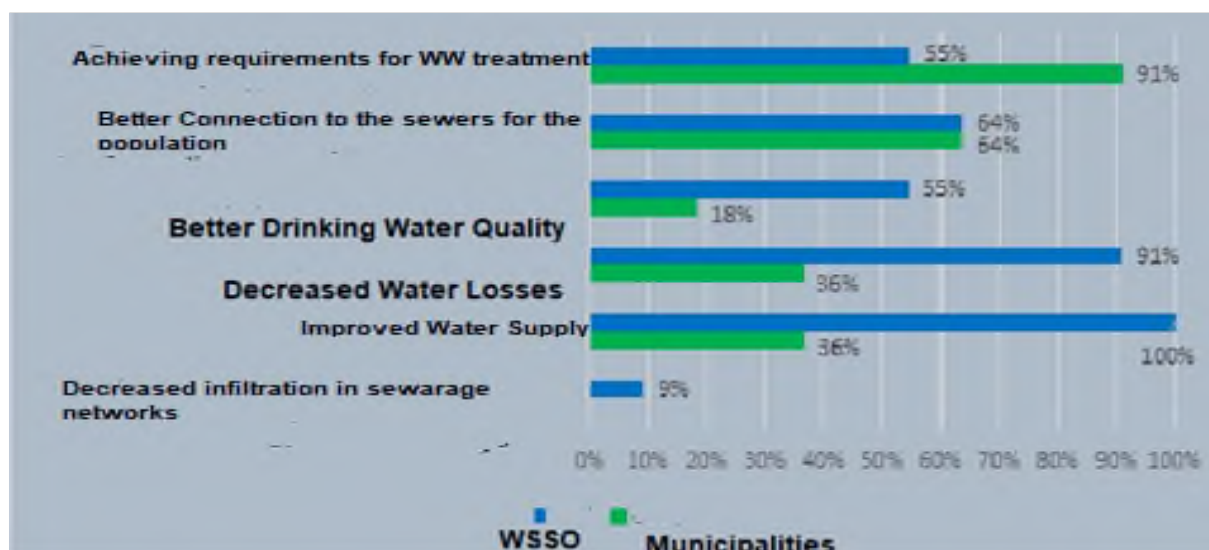
⁵¹Procedure BG16M1OP002-1.011 Improving drinking water quality monitoring

accordance with European standards⁵² and national legislation.⁵³ Ten laboratories of RHIs have increased capacity for monitoring the quality of drinking water in full compliance with legislative requirements. On the other hand, at the programming stage, it was not possible to satisfy the stated needs for twice as much funding, which would have supported other analyzes of drinking water, not only chemical and radiological. The summarized data from the control monitoring of drinking water carried out by the RHIs in 2021 shows that the general compliance with the requirements remains at a relatively high level, comparable to that in the previous years.⁵⁴

The developed river basin management plans (RBMP) for the period 2021-2027 provide a basis for water management and taking measures for its protection.

Benefits to society and final recipients

The benefits of the implemented improvements in water infrastructure are mainly better connectivity to sewage systems and meeting the requirements regarding wastewater treatment (see figure below). At the same time, municipalities and WSS companies prioritize benefits differently. While for municipalities the main benefit is meeting the requirements regarding waste water treatment, for WSS operators the improved water supply is reported to be the most beneficial.



Source: Conducted surveys among municipalities and WSS operators within the evaluation in the period May-June 2023.

Figure 6 . Benefits from the implementation of projects in the field of water and sanitation

Waste sector

The EU Waste Framework Directive requires EU Member States to recycle at least 50% of household waste and 70% of construction waste by 2020. It introduces a 5-level hierarchy of

⁵²Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption (repealed by EC Directive 2020/2184) and Council Directive 2013/51/EURATOM laying down requirements for the protection of public health in relation to radioactive substances in water intended for human consumption.

⁵³Ordinance No. 9 of March 16, 2001 on the quality of water intended for drinking and domestic purposes

⁵⁴National report on the state of the environment in Bulgaria, 2023, EEA

waste management actions, with prevention being the best option, followed by reuse, recycling, other forms of waste recovery and finally landfill as a last resort.

The hierarchy of waste management, which is the basis of European and national waste legislation, gradually leads to the adoption of preferred recycling options as well as to the limitation of landfilling. Turning waste into a resource drives innovation in recycling and reuse, limits landfilling and creates incentives for behavior change.

Improving household waste management

The total amount of household waste generated in the country decreases over the years (see the table below). But the household waste generated per capita remains relatively constant."⁵⁵

At the same time, while the amount of directly landfilled municipal waste is decreasing, the amount of municipal waste submitted for pretreatment and those submitted for recycling is increasing. This is an important indication of a positive change in interest (including that of citizens) towards the circular economy.

Table 17. Waste - general indicators

Indicators	2014	2021	Change
Total generated household waste (thousand tons)	3,193	3,058	-135
Generated household waste per capita, kg/capita/year	442	445	-3
Directly deposited municipal waste (thousand tons)	1,297	777	-520
Household waste submitted for preliminary treatment (thousand tons)	1,598	1,960	362
Share of household and similar waste submitted for recovery (%)	3*	30	27%
Share of landfilled household waste (%)	41%	25%	-15%
Share of household waste submitted for recycling (%)	9%	10%	1%
Household waste recycling rate (%)	35%**	45%	10%

Source: NSI, own calculations; *The data are for 2017: ** Data are for 2017 with source: EEA

NSI data show a sustainable 5-year positive trend in the recovery of household and similar waste, with the share of household and similar waste sent for recovery compared to generated waste growing from 3% (2017) to 30% (2021). At the same time, the recycling rate for household waste increased by 10%. Recycling includes material recycling, composting and anaerobic digestion⁵⁶.

According to data from the EEA and Eurostat, the trend for the five-year period (2017-2021) shows that at the national level the recycling rate of household waste⁵⁷ steadily increasing from 35% in 2017 to 45% in 2021, but despite the increase, the national target of 51% is not being achieved.⁵⁸

The support of the OPE 2014-2020 has made a significant contribution in this direction through the measures for the construction of installations for the preliminary treatment of household waste and for installations for the separate collection of biodegradable waste. 7 installations for

⁵⁵National report on the state of the environment in Bulgaria, 2023, EEA

⁵⁶ The indicator measures the share of recycled household waste to the total amount of generated household waste.

⁵⁷ Municipal waste is assumed to be primarily waste generated by end consumers, as it includes household waste and waste from other sources that are similar in nature and composition to municipal waste.

⁵⁸National report on the state of the environment in Bulgaria, 2023, EEA

the preliminary treatment of mixed household waste, which serve 20 municipalities, have been built and put into operation.⁵⁹ After the introduction of the installations, which have not yet been completed, a total of 17 installations covering the needs of 63 municipalities will function.

Demonstration projects also provide substantial support for the waste management policy. The projects are aimed at building a new culture and attitude towards the treatment of household waste, by combining practical activities and providing the necessary equipment, supported by training and motivation. This approach creates conditions for a sustainable change in behavior towards waste management at the local level. The focus on young people and students, as well as the involvement of local authorities, strengthens the sustainability of interventions. In general, the program contributes to strengthening the role of the public as a major factor in implementing the hierarchy of waste management.

According to interviewed experts, the most impactful and successful are the demonstration projects that deal with issues such as the household waste fee based on quantity, underground containers and recycling centers. In Annex 8 to this report, presenting projects selected as "good practices", also includes such a demonstration project.

Recycling of biodegradable waste

Composting and anaerobic digestion of biodegradable waste makes a significant contribution to the circular economy goals of municipal waste. Biowaste from households is particularly important, as it is a large part of the composition of mixed waste, mixed with other waste and landfilled. In general, biowaste is treated by composting or anaerobic digestion.

According to Art. 5(2c) of Directive 1999/31/EC on waste disposal Bulgaria should reduce by 2020⁶⁰ biodegradable household waste going to landfills up to 35% of the total amount (by weight) of biodegradable household waste produced in 1995. Bulgaria generated about 2.25 million tons of biodegradable household waste in the reference year 1995. According to EEA data⁶¹ in 2019, Bulgaria reported 38% landfilled biodegradable household waste (by weight) compared to the amount generated in 1995. On this basis, it is assumed that the country will meet the target.

OPE 2014-2020 contributes to increasing the rate of recycling of biodegradable waste by financing measures regarding the construction of composting installations for separately collected green and/or biodegradable waste and anaerobic installations for separately collected biodegradable waste. By June 2023, with the support of OPE, 22 installations for composting separately collected green and/or biodegradable household waste have been put into operation⁶², which serve 41 municipalities. Another 29 plants for composting green/biodegradable waste are about to be commissioned, which will additionally serve 71 more municipalities. 3 anaerobic installations for separately collected biodegradable household waste are under construction, which will be used by 13 municipalities.⁶³

⁵⁹Procedures: BG16M1OP002-2.002 Combined procedure for design and construction of composting installations and installations for preliminary treatment of household waste; BG16M1OP002-2.006 Second combined procedure for design and construction of composting installations and installations for pretreatment of household waste

⁶⁰The deadline under the Directive is 2016, but Bulgaria has been granted a 4-year derogation period and therefore has to reach the target by 2020

⁶¹Early warning assessment related to the 2025 targets for municipal waste and packaging waste, Bulgaria, June 2022

⁶²Procedures 2.002; 2.005; 2.006; 2.007

⁶³2.004 Design and construction of anaerobic installations for separately collected biodegradable waste

The comparison with the indicative lists (of RWMA, in which installations for composting and anaerobic degradation and preliminary treatment of household waste can be built) to the National Waste Management Plan 2014-2020 shows that according to the OPE 2014-2021 such installations have been built or are in the process of being built in 55% of the municipalities from these lists.

Measures for technical reclamation of landfills

The reclamation of landfills supported by the program contributes to the fulfillment of the country's obligations under Directive 1999/31/EC on waste disposal and under a procedure for violation of EU law in connection with the decision of the Court of the European Union of 16.07.2015 under case C-145/14. With the support of the program, as of June 2003, 52 landfills were reclaimed. Additionally, 5 more landfills are expected to be uncultivated. According to another procedure, also with funding from the program, the costs of the recultivated 35 landfills of 34 municipalities with the support of the EPA will be reimbursed. In this way, the OPE will contribute to the reclamation of 92 of the 104 landfills that were the subject of a Court decision for non-fulfilment of obligations under Article 14 of Directive 1999/31/EC .

As a result of the technical reclamation, the environment on the territory of the respective municipalities is restored (the terrain acquires an appearance corresponding to the surrounding landscape), ensuring the reduction of the risk of further environmental pollution and the prevention of risks to human health.

Benefits to society and final recipients

The main positive effects of the measures in the field of waste, according to the respondents-municipalities and NGOs, are the reduction of the amount of household waste deposited and, accordingly, the cessation of its negative impact on the components of the environment - air, soil and groundwater, and the increase of public awareness about waste and its management and utilization (see figure below).

Source: Conducted surveys among municipalities and NGOs within the framework of the evaluation in the period May-June 2023.

Figure 7 . Opinion of beneficiaries (municipalities and NGOs) regarding the benefits of their waste projects

The recycling and reuse of household waste are cited as additional benefits. About a third of the respondents also see benefits in increasing the capacity to implement measures in the area of waste and form policies in this area.

Natura 2000 and Biodiversity Sector

As of 2021, 34.9% of Bulgaria's territory is covered by Natura 2000 (EU average 18.5%), and according to this indicator the country is in third place after Slovakia and Croatia (see the table below).

Table 18. Protected areas under Natura 2000

Protected areas under Natura 2020	Number of zones	Area (ha)	Territory [ha]	Territory [ha]	% of the territory of Bulgaria
Protected areas under the Habitats Directive	233	3,615,603	3,367,916	2476.87	30.3%

Protected areas under the Wild Birds Directive	120	2,616,550	2,562,061	544.89	23.1%
Total protected areas "Natura 2000"	340*	4,155,839	3,873,704	2821.35	34.9%

Source: <https://www.moew.government.bg/bg/priroda/natura-2000/natura-2000-v-bulgariya/obsta-informaciya-za-ekologichnata-mreja-natura-2000/>; * 13 of 33 with a joint border under both Directives

Based on Natura 2000 and other nationally designated protected areas, Bulgaria legally protects 41% of its land areas (EU 27 average 26.4%) and 8.1% of marine areas (EU 27 average 10.7%).⁶⁴ As of December 2022, the network of protected areas includes: 120 protected areas for the protection of wild birds, covering 23.1% of the territory of Bulgaria; 233 protected areas for the protection of natural habitats, covering 30.3% of the territory of Bulgaria and a total of 340 protected areas "Natura 2000".⁶⁵

The implemented measures to improve the conservation status of species and habitats planned in the National Priority Action Framework (NPAF) for Natura 2000 contribute to the restoration of ecosystems in the Natura 2000 network and are in line with the EU Biodiversity Strategy as of 2020. The measures are with a focus on the sustainable management and restoration of the Natura 2000 network, capacity building for persons involved in the management of Natura 2000, as well as raising awareness among a wide range of interested parties with a view to protecting biological diversity in order to implement the National Information and Communication strategy for the Natura 2000 network (2014-2023).

Increasing the administrative capacity for the management of the Natura 2000 network and NPFA

Support for the management of Natura 2000 and the NPFA has been provided under a project to develop a management approach for the Natura 2000 network and for the management of the NPFA⁶⁶ and indirectly by a number of measures aimed at increasing the awareness and capacity of stakeholders⁶⁷.

The creation of a new management approach for the Natura 2000 network has been supported by research, analysis and stakeholder consultation aimed at defining the optimal management structure for the network. Approaches to the management of the planning process, coordination of the implementation and monitoring of the NPFA are proposed, the functions of the management at the national and regional level (including interdepartmental coordination) are outlined with the corresponding proposals for organizational solutions and financial estimates. The results of the project were used to draft legislative changes to introduce a new approach to Natura 2000 management, which, however, due to a lack of consensus among stakeholders, were not adopted.

The non-adoption of the planned and supported amendments to the Biodiversity Act governing the management structure of the Natura 2000 network has prevented the full use of resources

⁶⁴ Environmental Implementation Review 2022, Country Report – BULGARIA, European Commission

⁶⁵ National report on the state of the environment in Bulgaria, 2023, EEA;

<https://www.moew.government.bg/bg/priroda/natura-2000/natura-2000-v-bulgariya/obsta-informaciya-za-ekologichnata-mreja-natura-2000/>

⁶⁶BG16M1OP002-3.001 Development of a management approach for the Natura 2000 network and for the management of NPFA

⁶⁷Procedures 3.006 Raising stakeholder awareness of the Natura 2000 network; 3.019 Shared vision for the ecological network Natura 2000 in Bulgaria; 3.031 Shared vision for the ecological network Natura 2000 in Bulgaria - 23.020 Preparation/updating of action plans for species

provided for under the Change Support Programme. Additional measures to strengthen the capacity of the new structures, which were planned for implementation, have not been implemented.

However, the EC notes that, albeit belatedly and not fully, the OPE 2014-2020 has contributed to the development of capacity to manage the Natura 2000 network with the active involvement and cooperation of stakeholders from the public and private sectors. In this way, it contributes to the implementation of a number of EC recommendations expressed in the Report on the Implementation of Environmental Policies for 2022, regarding the accelerated completion of the process of designation of special protected areas /SAC/ and the introduction of specific for the protected areas nature protection objectives and measures for each habitat and each species of interest to the Community in all protected areas under Natura 2000.⁶⁸

Through analysis and research supported by the program⁶⁹, stakeholders, and above all, the future management authorities of the protected areas are assisted in the planning of conservation objectives and conservation measures. The capacity for monitoring and analyzes of the environmental protection status of the protected sites of the responsible institutions (in particular - the EEA) has been strengthened thanks to the developed/supplemented over 150 methodologies for monitoring and assessing the environmental protection status of natural habitats, species and birds. The new data collected and the improved capacity in government and research institutions are a prerequisite for a more effective policy for the protection of the natural environment.

Improved or preserved conservation status of species and natural habitats

According to the report submitted by Bulgaria on the conservation status of habitats and species covered by Article 17 of the Habitats Directive for 2013-2018, the proportion of assessments of habitats in favorable conservation status in 2018 was slightly higher than 10.87 % that were reported for the previous period (2007-2012)⁷⁰.

As for protected species, the proportion of favorable conservation status assessments in 2018 was 38.06%, which is a significant decrease compared to the 53.32% reported for the previous reporting period (2007-2012).⁷¹ In birds, 54% of breeding species show short-term increasing or stable population trends (for wintering species the figure is close to 30%).⁷²

The overall status index for common bird species for the period 2005–2021, based on 50 species, shows a trend for stable status, with farmland birds declining and forest birds increasing. Of all the 79 bird species assessed in 2021, those with a declining trend are 19%, with an increasing trend 28%, 18% are stable, and those with an undetermined trend category are 35%.⁷³

⁶⁸ Environmental Implementation Review 2022, Country Report – BULGARIA, European Commission

⁶⁹ Procedures: 3.003 Analyzes and studies of species and natural habitats subject to reporting under Art. 17 of the Habitats Directive and Art. 12 of the Birds Directive; 3.020 Preparation/update of species action plans

⁷⁰ [Reporting under Art. 17 of the Habitats Directive](#)

⁷¹ [Reporting under Art. 12 of the Birds Directive](#)

⁷² Environmental Implementation Review 2022, Country Report – BULGARIA, European Commission

⁷³ National report on the state of the environment in Bulgaria, 2023, EEA: The index of common bird species shows the trends in the number of widespread bird species in Bulgaria for a fixed period of time and allows the evaluation of the degree of loss of biological diversity. The overall status index for widespread bird species includes an index of farmland birds, an index of woodland birds and 'other' bird species that are not bound to a specific habitat type.

As of June 2023, the area of habitats supported to achieve a better degree of conservation is 1,274,221 ha, which represents approximately 31% of the total area of areas protected under Natura 2000. Regarding the habitats of species supported to achieve a better degree of conservation, the contribution of the program represents about 15% (967766.48 ha) of the area of protected areas under both directives.

OPE 2014-2020 has supported the conservation status of birds that are defined as species with the highest threat status in Bulgaria (according to the IUCN categories - Annex I of the Birds Directive), such as the Egyptian vulture, the curly-headed pelican, the golden eagle and the peregrine falcon, as well as a number of other protected species.⁷⁴

OPE 2014-2020 has a major contribution to the development of the action plans for the planning period with a horizon of 2030-2031, as 9 conservation plans for 15 species have been drawn up and approved, and 13 conservation plans for 19 species are in PA3 development process.⁷⁵

The pilot project for the purchase of agricultural lands by the state is a suitable way to preserve the protected areas, the impact of which will be realized in the next program period, when this intervention is continued.

An important tool for the protection of species and habitats is raising public awareness of the subject and objectives of the Natura 2000 network. A total of 21 projects⁷⁶ have contributed to building a shared vision for Natura 2000 among a wide range of stakeholders involved in network management and NPPFA. As a result of 2 national information campaigns⁷⁷, accompanied by dozens of regional events, as well as the 20 regional campaigns carried out, the awareness of institutions, businesses and citizens about the importance and benefits of the Natura 2000 network has increased.

Benefits to society and final recipients

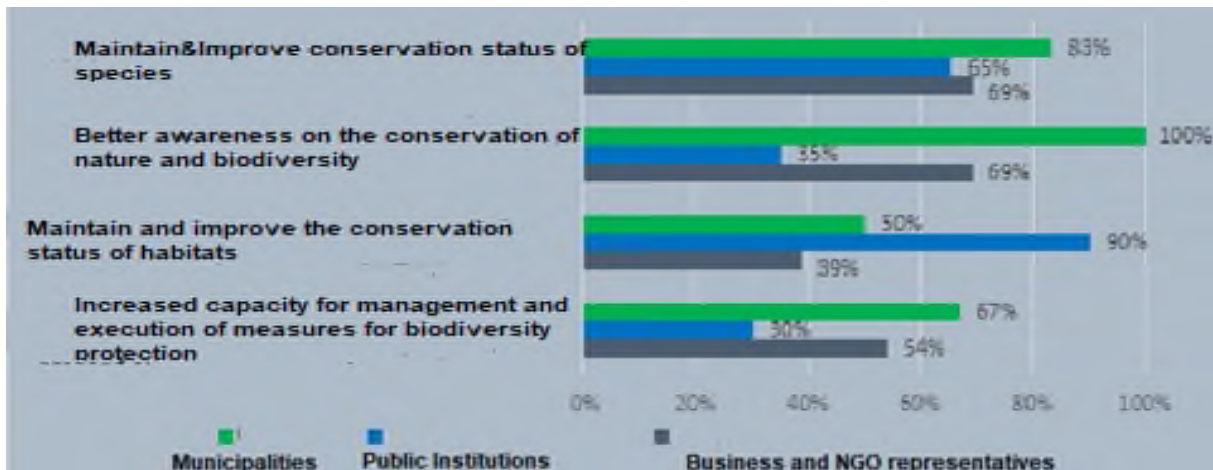
Respondents to the online surveys considered the maintenance and enhancement of habitats and species to be the main positive effects of the measures supported by the program (see figure below). At the same time, the main benefit for municipalities, businesses and NGOs is the better awareness of nature protection and biological diversity. Public institutions also see additional benefits such as: created favorable conditions for future investments in the protection of natural and biological diversity (25% of respondents), improved cooperation and coordination between interested parties (15%); more effective implementation of environmental legislation (10%).

⁷⁴Procedures: 3.020 Preparation/update species action plans; 3.027 Measures to improve the conservation status of birds – 2; 3.007 Improvement of the nature conservation status of species and types of natural habitats on the territory of the Natura 2000 network falling into national parks, nature parks and maintained reserves

⁷⁵Procedure: 3.020 Preparation/update species action plans

⁷⁶Procedures 3.006 Raising stakeholder awareness of the Natura 2000 network; 3.019 Shared vision for the ecological network Natura 2000 in Bulgaria; 3.031 Shared vision for the ecological network Natura 2000 in Bulgaria - 2

⁷⁷The first national campaign was conducted in 2020-2022, and the second campaign is underway, starting from January 2023.



Source: Conducted surveys among municipalities, public institutions, companies and NGOs in the period May-June 2023.

Figure 8 . Opinion of beneficiaries (municipalities, public institutions and NGOs) regarding the benefits of their projects in the field of NATURA 2000 and biodiversity protection

The survey and interviews with beneficiaries show a broader view of the overall contribution of the program to improving environmental protection at the local, municipal and national levels.

It should be noted that support for the Community-Led Local Development (CLLD) approach in the form of financing direct conservation activities makes it difficult for the LAG and local communities, as the announced procedures concern the implementation of conservation measures for strictly specific species and do not foresee other measures, including "soft" ones (preparation of action/conservation plans or measures to create local capacity for biodiversity conservation).

Flood and Landslide Risk Prevention and Management Sector

The territories with an increased risk of floods, landslides and abrasion in Bulgaria are those along the river. Danube (the municipalities of Vidin, Mizia, Gulyantsi and Belene, Svishtov, Slivo Pole and Tutrakan) and the larger inland rivers, as well as along the Black Sea coast (in the area from Varna to Kavarna), the Eastern Rhodopi and some valleys in Western Bulgaria. Intense rainfall, a manifestation of climate change, increases the risk of flooding and endangers people, agricultural holdings, buildings, technical infrastructure, etc. The municipalities most threatened by floods are located in the regions of Northern Bulgaria.⁷⁸

The main positive impact of OPE 2014-2020 support under PA4 is better prevention and management of flood risk in populated areas and reduction of landslide and collapse risks, as well as population preparation for response to floods and other crises events. In the long term, measures under PA4, as well as other investments under PA1 and PA3, contribute to climate change adaptation and crisis risk management related to natural disasters.

The NSI data in the table below show a tendency to decrease the number of landslides and floods in the period 2014-2021, which can be partially explained by the improvement of the preventive activities of the institutions, mainly of the MOEW and the MRDPW.

Table 19. Landslides and floods in the period 2014-2021 in total for the country (number)

⁷⁸ The national spatial development concept for the period 2013-2025.

Indicators	2014	2015	2016	2017	2018	2019	2020	2021
Landslides	4,356	4,008	3,577	1,594	1,420	1,066	1,220	89
Floods	360	266	184	159	84	108	100	78

Source: NSI

Flood protection measures and population preparation for response to floods and other crisis events

Flood measures are institutionalized in Flood Risk Management Plans (FRMPs). And with them, the emphasis is on preventive measures - maintenance of good conductivity of the riverbeds, good condition of the hydrotechnical and protective facilities, the drainage systems and fields, the drainage pumping stations. Individual cities' plans for adaptation to climate change include measures to reduce the vulnerability of urban environments to flooding after torrential rains, and risk zones are an element of municipal development plans.⁷⁹

In this regard, with the support of OPE, the FRMPs for the period 2022-2027 have been developed⁸⁰, which ensure long-term planning to reduce the risk of floods in the territory of Bulgaria.

A real-time water management system for the Iskar river basin is under development, in which to concentrate and manage the data and processes related to the risk of floods, and the Iskar river basin, as a pilot project towards the creation of a national system for real-time water management, which will be implemented with the help of OPE 2021-2027.⁸¹

The program contributes to increasing the capacity at the national level for actions in floods and subsequent crises, through the establishment of 6 regional training centers.⁸² This capacity is expected to be upgraded with the implementation of the MoI project to build a national information system (platform) for analyzing and assessing disaster risks.⁸³ A flood data collection system will be established as different departments collect data but are not linked in a system. This national system will cover the entire population and, accordingly, reduce the negative consequences of realized risks of disasters and crises. A project is also being implemented⁸⁴ to expand the system for early warning and notification of the population at the municipal level, through which timely warning and notification of people on the territory of a given municipal center about an impending or occurring disaster will be ensured and instructions for the necessary measures and follow-up actions will be broadcast through acoustic "live" alerts and voice information.

The program's effect on mitigating the risk of flooding caused by compromised dam infrastructure has been limited, despite initial expectations of greater impact in this direction.

⁷⁹The national spatial development concept for the period 2013-2025 (updated in 2019)

⁸⁰Procedure 4.005. Implementation of studies and evaluations in connection with the second FRMP for the period 2022-2027.

⁸¹Project BG16M1OP002-4.002-0001 Creation of a Water Management System in the Iskar River Basin (WMS-IRB) as the first phase of a National Water Management System in real time

⁸²BG16M1OP002-4.001-0001 "Centers for increasing the preparedness of the population for flood response"

⁸³BG16M1OP002-4.006-0001-C03 "Integration, upgrade and optimization of processes for prevention, preparedness and response to natural risks"

⁸⁴BG16M1OP002-4.009-0001-C01 "Expansion of the system of early warning and notification of the population at the lau level and modernization of the EWRS of the executive authorities"

Only 3 dams (Gabrovo, Galabovo and Svilengrad) have been rehabilitated with the support of OPE, due to the lack of interest and, above all, capacity on the part of the municipalities.

Landslide prevention and strengthening

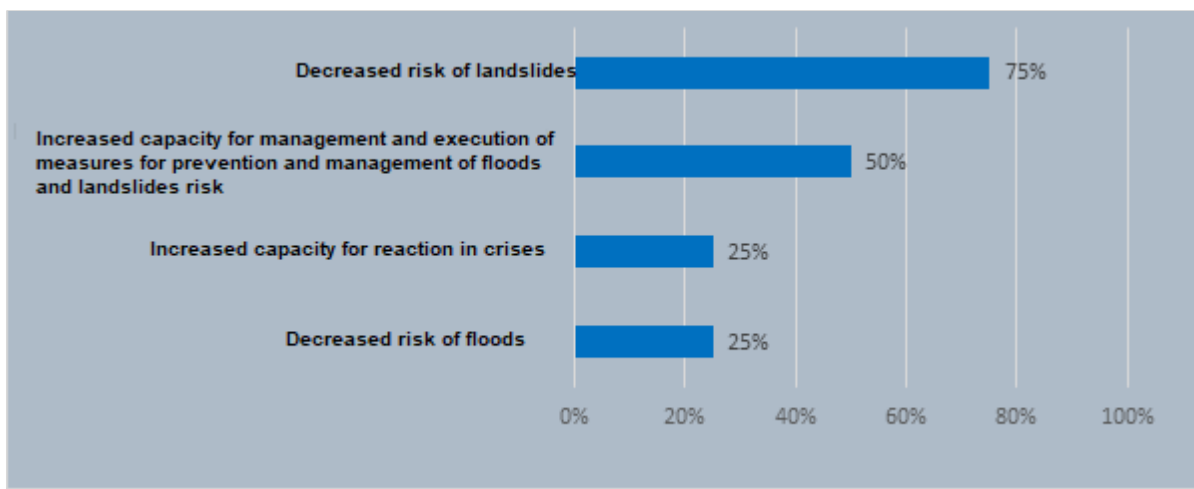
The monitoring of landslide processes through geodetic, inclinometric, stationary hydrogeological and other measurements with a view to early warning, response and other preventive actions related to protecting the life and health of people in landslide areas is supported by the construction/restoration of control and instrumentation systems (C&I) in 26 landslide areas registered and prioritized according to the National Program for the Prevention and Limitation of Landslides (on an area of 693 ha).⁸⁵

As a result of the support of OPE 2014-2020⁸⁶ the area of fortified landslides amounts to 32.90 ha, and the population living in conditions at risk of landslides has decreased by nearly half a million (446,434).

Benefits to society and final recipients

The interviewed and surveyed beneficiaries (municipal and state administration) noted the positive impact of the supported projects on the reduction of the risk of landslides and floods, respectively the prevention of adverse consequences for human health and the environment.

The reduced risk of landslides is indicated as the main benefit of funding under PA4 by the surveyed beneficiary municipalities (see figure below).



Source: Conducted survey among municipalities in the period May-June 2023.

Figure 9 . Opinion of the beneficiary municipalities on the benefits of the projects implemented by them under PA4

Air sector

Air quality in Bulgaria continues to cause serious concern. The latest available annual estimates of the European Environment Agency (EEA)⁸⁷ for Bulgaria indicate over 10,600 cases of

⁸⁵BG16M1OP002-4.003-0003-C03 "Preventive activities through the construction/restoration of control and instrumentation systems in registered landslide areas"

⁸⁶ BG16M1OP002-4.003 Prevention and counteraction of landslide processes to limit their risk (including along the republican road network)

⁸⁷<https://www.eea.europa.eu/themes/air/country-fact-sheets/2022-country-fact-sheets/bulgaria-air-pollution-country-fact-sheet>

premature death due to concentrations of fine particulate matter and 1,674 - to nitrogen dioxide (NO₂) concentration (see table below).

Table 20. Adverse health impact of key air pollutants for the period 2016-2020 (Bulgaria vs. EU)

Country	Population (thousands)	Average annual FPM _{2.5} ,	Premature deaths, FPM _{2.5}	Annual average NO ₂	Premature deaths, NO ₂
		(µg/m ³)	Number (%)	(µg/m ³)	Number (%)
Bulgaria	6,951	17.00	10,625 (0.15%)	16.70	1,674 (0.02%)
EU27	442,850	11.20	237,810 (0.05%)	14.10	48,555 (0.01%)

Source: European Environment Agency

According to case C-488/15 of the Court of the EU (European Commission against the Republic of Bulgaria), our country was recognized as systematically violating the norms of *Directive 2008/50/EC on the quality of atmospheric air and cleaner air for Europe* until 2014 regarding FPM₁₀. In 2023, the Court rejected a claim by the European Commission, which again dealt with the issue of exceeding the norms for FPM₁₀, which saved our country from very high financial sanctions.

In this context, OPE 2014-2020 investments to improve air quality with regard to fine particulate matter contribute to the fulfillment of national commitments under Directive 2008/50/EC.

The effects of air pollution are felt most strongly in urban areas, where people experience significant health problems, and in ecosystems, where pollution can lead to loss of biodiversity. Among the main anthropogenic sources of air pollution are road transport, the production of electricity and thermal energy, industry, agriculture and domestic heating.⁸⁸

According to Directive 2016/2284/EU on the reduction of national emissions of certain atmospheric pollutants, Member States should comply with the obligations established in the directive to reduce emissions of sulfur dioxide (SO₂), nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOC), ammonia (NH₃) and fine particulate matter (FPM_{2.5}) for each year from 2020 to 2029 and from 2030 onwards, compared to the base year 2005. An obligation to adopt and implement national air pollution control programs, as well as monitoring of the pollutants defined in the directive is also introduced.

Analyzes in the National Program for the Improvement of Ambient Air Quality (NPAAQ) 2018-2024 show that the main problem of the municipalities is the exceeding of the average day-to-day norm of FPM₁₀. Although there has been a significant improvement in the levels of this pollutant over the past ten years, FPM emissions are still a major challenge for the country.

Comparison between EEA data⁸⁹ for the average annual concentration and the number of exceedances of the average day-night norm [50 µg/m³] of FPM₁₀ in the municipalities beneficiaries under the OPE for 2018 and 2022 shows a decrease in the concentration of FPM in the respective cities (with the exception of Ruse). A direct contribution of the OPE to these results as of 30 June 2023 cannot be sought, since of the projects expected to have a direct impact on reducing pollution, mostly the projects for the supply of greener vehicles have been completed (with the exception of Ruse). The projects to replace the population's heating devices with more environmentally friendly ones are still in progress.

⁸⁸National report on the state of the environment in Bulgaria, 2023, EEA

⁸⁹Annual bulletins on ambient air quality, EA "Environment"

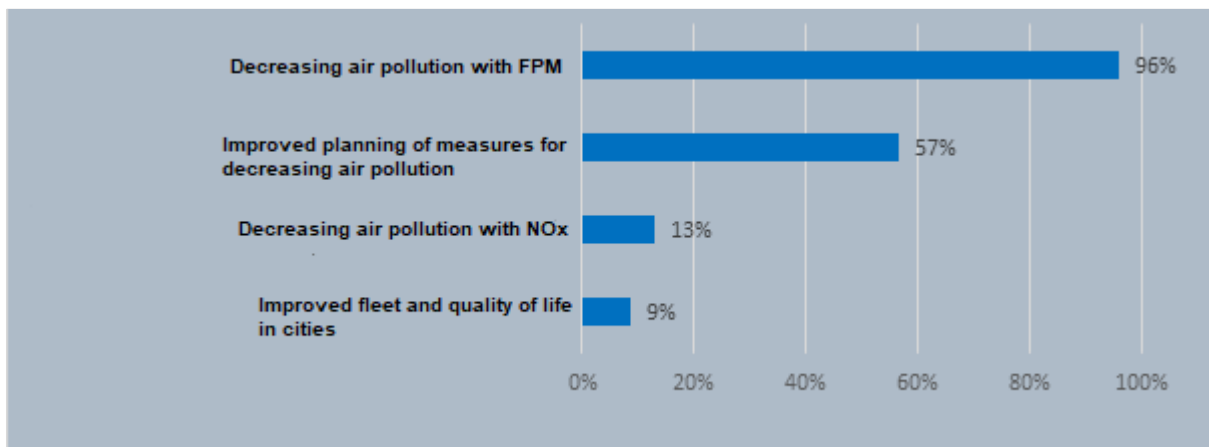
On the other hand, a good synergistic effect is expected in the target municipalities for the projects supporting the replacement of domestic heating appliances with more ecological alternatives, since similar projects are also financed through other programs (LIFE).

The contribution of OPE can be sought in the improved planning of the municipalities, through the support for developing programs to improve the air pollution control system and reach the established standards, according to Article 27 of the Clean Atmospheric Air Act (CAAA). The development/updating of such programs is supported for 21 municipalities.⁹⁰

EA "Environment" is supported in the reporting through the European Environment Agency of data on the quality of atmospheric air, the creation of an information system for reporting data on the quality of atmospheric air as part of the National system for real-time monitoring of air pollution.⁹¹

Benefits to society and final recipients

The most important effect of the projects financed under PA5, according to the surveyed municipalities, is the reduction of air pollution by FPM, indicated in almost all responses (see the figure below).



Source: Conducted survey among municipalities in the period May-June 2023.

Figure 10 . Opinion of the beneficiary municipalities on the main expected benefits of the implemented projects in the area of air quality improvement

Lowering the level of air pollution with nitrogen oxides is reported as a benefit of the program by less than 14% of the responding municipalities. Support for strategic planning in the area of atmospheric air quality (development and implementation of measures to reduce air pollution, mainly in the form of adoption of municipal programs to improve air quality) is also positively received by municipalities.

Priority axis 6 Technical assistance

The support under this priority axis has a positive impact on the other priority axes by ensuring the effective management of the program, strengthening the administrative capacity of the beneficiaries and the MA and popularizing the results of the implementation among the public.

⁹⁰Procedures 5.002 and 5.005

⁹¹5.001 Establishment of an information system for reporting ambient air quality data as part of the National Real-time Air Quality Monitoring System

EQ9 What is the contribution of ESIF support through OPE 2014-2020 to achieving the goals of the Europe 2020 Strategy, the SP, etc. relevant national and European strategic documents in the field of environmental improvement, protection and restoration?

Due to its complex strategic and legal framework, complex interventions and cross-border effects, OPE 2014-2020 contributes to the implementation of policies in various sectors. In the context of supporting a number of national policies in the field of ecological transition, the program also contributes to achieving the goals of *the Europe 2020 Strategy, the National Development Program of Bulgaria until 2020* . and *the National Reform Programs (2020 and 2022)*.

Contribution of OPE 2014-2020 to the EU's Europe 2020 Strategy for smart, sustainable and inclusive growth

The Europe 2020 strategy was the EU's agenda for growth and jobs for a period of 10 years. It focuses on smart, sustainable and inclusive growth in order to improve the EU's competitiveness and productivity and maintain a sustainable social market economy. The meaning of these objectives is as follows:

- Smart Growth: development of an economy based on knowledge and innovation;
- Sustainable Growth: promoting a more efficient use of resources, a greener and more competitive economy; and
- Inclusive Growth: promoting an economy with high employment, providing social and territorial cohesion.

The main focus of the OPE 2014-2020 is on the sustainable growth priority (resource efficiency), with program measures helping to achieve the main objectives of the 2020 strategy related to climate change and energy:

- Reduce greenhouse gas emissions by 20% compared to 1990;
- Increase the share of renewable energy sources in final energy consumption to 20%; and
- Improve energy efficiency by 20%.

In relation to the seven flagship initiatives of Europe 2020, the OPE 2014-2020 is directly aimed at the initiative for a **Resource Efficient Europe**. This initiative contains important approaches for developing European environment and climate policies. The contribution of OPE to achieving the objectives of the Europe 2020 Strategy is presented in the following table.

Table 21. OPE contribution to the sustainable growth priority of the Europe 2020 Strategy

Europe 2020 Strategy	Contribution of OPE 2014-2022.
Reduce greenhouse gas emissions by 20% compared to 1990	<ul style="list-style-type: none"> • Measures in connection with treatment of WWTP sludge and supply of necessary equipment, incl. of already built WWTPs (PA1) • Landfill reclamation measures – 52 landfills that have undergone technical reclamation • Measures for investment in environmentally friendly vehicles for urban transport and Measures for replacing solid fuel heating appliances with more environmentally friendly ones (PA5)

Increase the share of renewable energy sources in final energy consumption to 20%;	<ul style="list-style-type: none"> Measures for the construction of installations for the utilization of separated biogas from landfills for non-hazardous waste (PA2). Design and construction of anaerobic installations for separately collected biodegradable waste (PA2) Investment measures in ecological (electric) vehicles for urban transport and measures to replace solid fuel heating appliances with more environmentally friendly ones (air conditioners, pellet appliances) (PA5)
Energy efficiency to be improved by 20%.	

The national programs for reforms in implementation of the "Europe 2020" Strategy set the national goals in implementation of the "Europe 2020" Strategy and present the priority areas for achieving economic and structural reforms. The measures under the OPE 2014-2020 are directly related to the realization of the national goals under the "Climate-Energy" package of the **National Reform Program Europe 2020** (update 2020), as illustrated below:

Table 22. Contribution of OPE 2014-2022 to the implementation of the national goals under the "Climate-Energy" package of the National Reform Program (NRP) Europe 2020

National targets under the Climate-Energy package	Report on progress in the implementation of measures in the NRP Europe 2020 for 2020, MoF	Recommendations of the Council in the reports on Bulgaria (for 2020 and 2022)	Contribution of OPE 2014-2022.
<i>16% share of renewable energy in gross final energy consumption by 2020.</i>	National goal "16% share of renewable energy in gross final energy consumption by 2020" has been met ahead of schedule.	Limited progress (as of 2020): Bulgaria is still far from achieving compliance with the Drinking Water Directive and the Urban Wastewater Treatment Directive. For waste, there has been some progress in closing and remediating non-compliant landfills. Completed and ongoing waste infrastructure projects funded under various programs are of limited scale and many projects are yet to be implemented.	Investments in water infrastructure, targeted treatment of sludge and its use for energy purposes;
<i>Increase energy efficiency by 25% by 2020.</i>	Unfulfilled goal. Of key importance will be the coherence of the ESIF implementation for 2014-2020 and the actions under the Recovery and Resilience Mechanism.	The circular use of materials in Bulgaria is among the weakest in the EU (as of 2022). The percentage of material use in the circular economy in Bulgaria is 2.6%, compared to 12.8% for the EU. At 32% level, the municipal waste recycling rate is significantly below the 2025 target of 55% and below the EU average of 46%. Waste management and compliance with obligations to collect and treat urban wastewater continue to be a challenge.	Construction of anaerobic installations for separately collected biodegradable waste/Construction of installations for utilization of separated biogas from landfills for non-hazardous waste;
<i>Avoiding increasing the levels of greenhouse gases (GHG) outside the scope of ETS by more than 20% by 2020 compared to 2005.</i>	Unfulfilled. The country's participation in the negotiation processes, the preparation and implementation of national policies to reduce the level of greenhouse gas emissions in the context of international initiatives, such as the Paris Agreement, the "Green Deal", etc., will be essential.		Measures to address transport as a source of atmospheric air pollution by deploying electric vehicles for operation.

Contribution of OPE 2014-2020 to the National Development Program

The National Development Program of Bulgaria until 2020 is an integrated framework document linking the EU priorities in the context of the "Europe 2020" strategy and the national priorities of Bulgaria. The program covers the areas of socio-economic development of Bulgaria and defines the necessary measures to achieve the development goals. 8 priorities of the national development policy have been defined, and the direct contribution of OPE is to three of the priorities indicated in the table below. OPE has an indirect contribution to sustainable and integrated regional development, agriculture in the part for sustainable management of natural resources and energy and resource efficiency.

Table 23. Contribution of OPE 2014-2020 to the priorities of the National Development Program of Bulgaria until 2020.

Priority Area	Contribution of OPE
<i>3. Achieving sustainable integrated regional development and using local potential</i>	<ul style="list-style-type: none"> • Investment measures in water and sanitation infrastructure (PA1) • Measures to reduce landfilled household waste and reclamation of landfills (PA2) • Measures to improve the nature protection status of species and habitats from the Natura 2000 network, including through the CLLD approach (PA3) • Measures to reduce the risk of floods and landslides (PA4) • Measures to improve air quality (PA5)
<i>4. Development of the agricultural sector to ensure food security and production of products with high added value in the sustainable management of natural resources;</i>	<ul style="list-style-type: none"> • Improvement of the nature protection status of species and habitats from the Natura 2000 network, including by means of the CLLD approach (PA3); • Measures to build, develop and maintain a shared vision for Natura 2000 in Bulgaria by conducting regional information campaigns (PA3).
<i>7. Energy security and increasing resource efficiency</i>	<ul style="list-style-type: none"> • Measures under PA2 for the construction of installations for the utilization of separated biogas from landfills for non-hazardous waste; • Measures to address transport as a source of air pollution - modernization of municipal transport using electric vehicles (PA5)

Contribution of OPE 2014-2020 to national policies and European and national regulatory documents regarding the improvement, protection and restoration of the environment

The implementation of measures under the OPE 2014-2020 are in the context of multiple sector strategies and policies.

National environmental legislation follows EU policy approaches in this area, namely: the principles of precautionary measures, preventive actions and elimination of pollution at the source, as well as the "polluter pays" principle. Environmental policies and regulations are increasingly integrated with climate and energy policies and their evaluation should take into account these interdependencies.

The Environmental Protection Act (EPA) regulates public relations related to the protection of the environment and its components and the protection of human health. The law regulates the implementation of a number of mechanisms for managing activities related to the impact on the environment, including procedures for assessing the impact on the environment, issuing complex permits, access to environmental information, etc.

Activities and measures for the protection and preservation of individual elements of the environment are specified in special acts introducing EU requirements for the relevant sector. By supporting the implementation of the requirements of EU law incorporated into national legislation, the OPE 2014-2020 has a direct positive impact on ensuring due compliance with national and European policies and norms.

The implemented measures in **the "Water" sector** contribute to the implementation of the Waters Act and the Regulation of Water Supply and Sewerage Services Act, being in line with the implementation of national commitments under the Water Framework Directive, the Urban Wastewater Treatment Directive; The directive on the quality of water intended for human consumption, etc. Investments under PA1 correspond to the national strategic priorities and contribute to their realization and, in particular, in the context of the National Strategy for the Management and Development of the Water Sector (2012-2037), the Strategy for the Development and Management of Water Supply and Sewerage in the Republic Bulgaria for the period 2014-2023.

Regarding **the "Waste" sector**, the program primarily contributes to the implementation of the Waste Management Act, respectively, the requirements of the Waste Landfill Directive, as well as a number of other by-laws and EU directives. Investments within the framework of PA2 have an important role for the effective and efficient management of waste in Bulgaria, expanding the participation of the various stakeholders in this process. The implemented measures lead to a reduction of the harmful impact of waste on the environment and the health of the population, and in particular, to prevent the formation of waste and increase its utilization as a valuable resource. In this aspect, the OPE 2014-2020 contributes to the implementation of national strategic documents and obligations under European and international ones: National Waste Management Plan 2014-2020 and 2021-2928; National strategic plan for gradual reduction of the amount of biodegradable waste destined for landfill 2010-2020; The European Green Deal.

In the area of **biodiversity and Natura 2000**, the main source of regulation is the Biodiversity Act, with a focus on fulfilling obligations to protect species, birds and habitats under the Habitats and Wildlife Directive and the Conservation Directive of wild birds. PA3 measures support strategic nature conservation planning in the context of the National Priority Action Framework for Natura 2000. They have a direct contribution to the objectives of the national Biodiversity Strategy, as well as to the objectives of the EU Biodiversity Strategy. Supported actions correspond to commitments under a number of international conventions on biodiversity, landscape, wild flora and fauna, etc.

Interventions on **the prevention and management of the risk of floods and landslides** contribute to the implementation of sectoral and horizontal legal acts, and in particular, the Protection against Disasters Act, respectively the Directive on the evaluation and management of flood risks. PA4 investments make a key contribution to the implementation of national disaster risk policies (the 2030 Disaster Risk Reduction Strategy, the National Disaster Protection Program 2014-2018) as well as policies aimed at adaptation to climate change at the national and sectoral level (in terms of sustainable land management, prevention and mitigation of landslides, development of the forestry sector, etc.).

The leading source of the legal framework determining **the quality of atmospheric air** is the Clean Atmospheric Air Act and, respectively, at the EU level, the Directive on the reduction of national emissions of certain atmospheric pollutants and the Directive on the quality of atmospheric air and for cleaner air for Europe. The measures supported by PA5 contribute to the implementation of the National Program for the Improvement of Ambient Air Quality 2018-

2024 and support strategic planning in this sector, including by supporting the development/updating of the relevant municipal programs.

The program also contributes to the implementation of two interrelated national instruments for integrated planning and sustainable spatial, economic and social development. These are:

- **The national concept for spatial development 2012-2025** - provides guidelines for the organization, management and protection of the national territory and water area and creates prerequisites for spatial orientation and coordination of sectoral policies, and
- **The National strategy for regional development 2012-2022** – a basic document that defines the strategic framework of the state policy for achieving balanced and sustainable development of the regions of the country and for overcoming intra-regional and inter-regional differences/inequality in the context of the pan-European cohesion policy and achieving intelligent, sustainable and inclusive growth.

Contribution of OPE to the achievement of strategic goals and European and national legislation in the various sectors is presented in Annex 6.

EQ10 What are the identified unintended effects (positive and negative) of the OPE interventions 2014-2020?

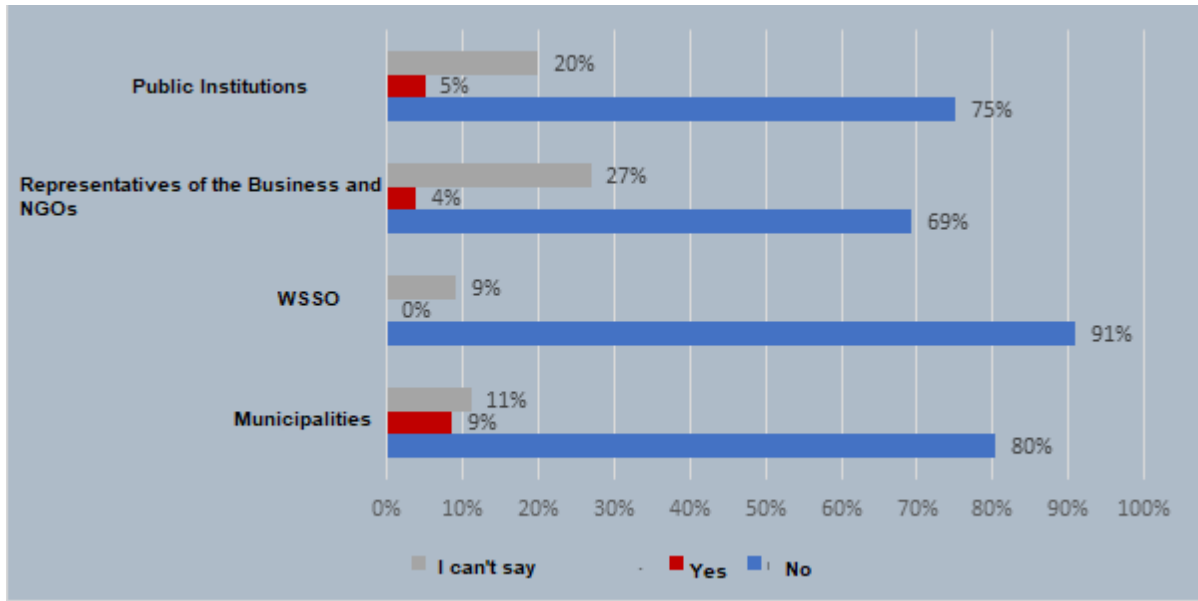
The following additional effects have been identified: displacement effects in investments in WSS infrastructure, where the environmental benefits lead to aggravation of the financial situation of WSSO and more expensive services for the population. A multiplier effect was also identified in which additional funds were added to the funds from the program by the beneficiaries (WSS operators and municipalities) for investments in WSS infrastructure, infrastructure for waste treatment, prevention of floods and landslides and improvement of air quality.

The following possible effects have been analyzed as part of the unplanned effects:

- dead weight loss - Changes or effects that would occur without program support
- displacement effect - Positive effects on some subjects have negative consequences for other subjects
- substitution effect - Provision of support for some entities at the expense of others
- leverage effect - Provision of additional financing or implementation of accompanying measures resulting from investments under the OPE

Dead weight:

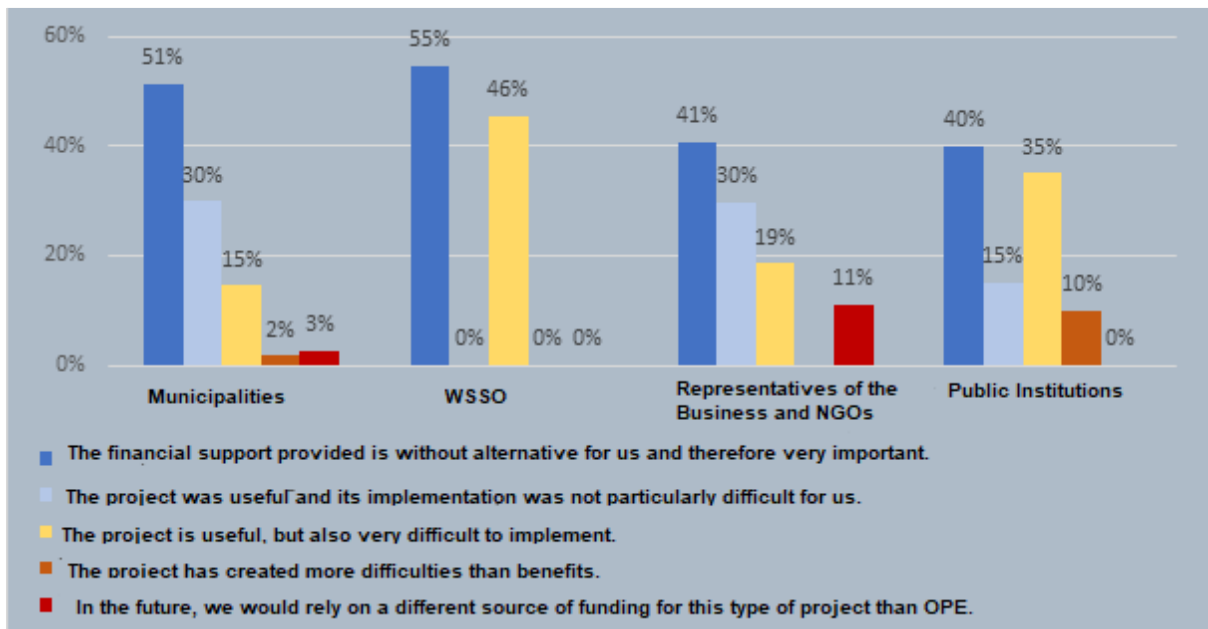
It was investigated to what extent the program financed activities that would have happened without its support. As can be seen from the responses of the survey respondents (see figure below), OPE has for the most part provided funding that has no alternative, especially in terms of investments in WSS infrastructure. Only a small number of municipalities and public institutions were likely to seek another source of funding for some measures, especially those related to compliance with regulatory requirements.



Source: Surveys conducted in the period May-June 2023.

Figure 11 . Answer to the question "If it were not for the OPE support, would you have realized the project?"

The above is also confirmed by the view of how the benefits of the project are assessed (see the figure below). For the majority of respondents, regardless of their type, the projects were without alternative or very useful. Only 11% of NGO and business representatives would not rely on OPE for financing such type of projects in the future, and 10% of public institutions consider that the difficulties they experienced during the implementation of the project are greater than the benefits.



Source: Surveys conducted in the period May-June 2023.

Figure 12 . Answer to the question "How would you rate the benefits of the project compared to the burden of implementing the project?"

Displacement effect

Cross-directional effects are observed in these effects - positive effects on some subjects have negative consequences on other subjects.

As such, the effects of investments in WSS infrastructure can be considered, where the positive effects of improved wastewater treatment lead to a worsening of the financial situation of WSS operators and an increase in the price of water for consumers.

Substitution effect

The substitution effect considers the provision of support to some entities at the expense of others. No such effects have been identified under OPE support.

Leverage effect

The leverage effect includes the provision of additional financing or the implementation of accompanying measures resulting from OPE investments. Such effects are observed mostly in the investments in water and sanitation infrastructure under PA1, where, on the part of the beneficiaries, an additional BGN 846 mln were assured. (see table below).

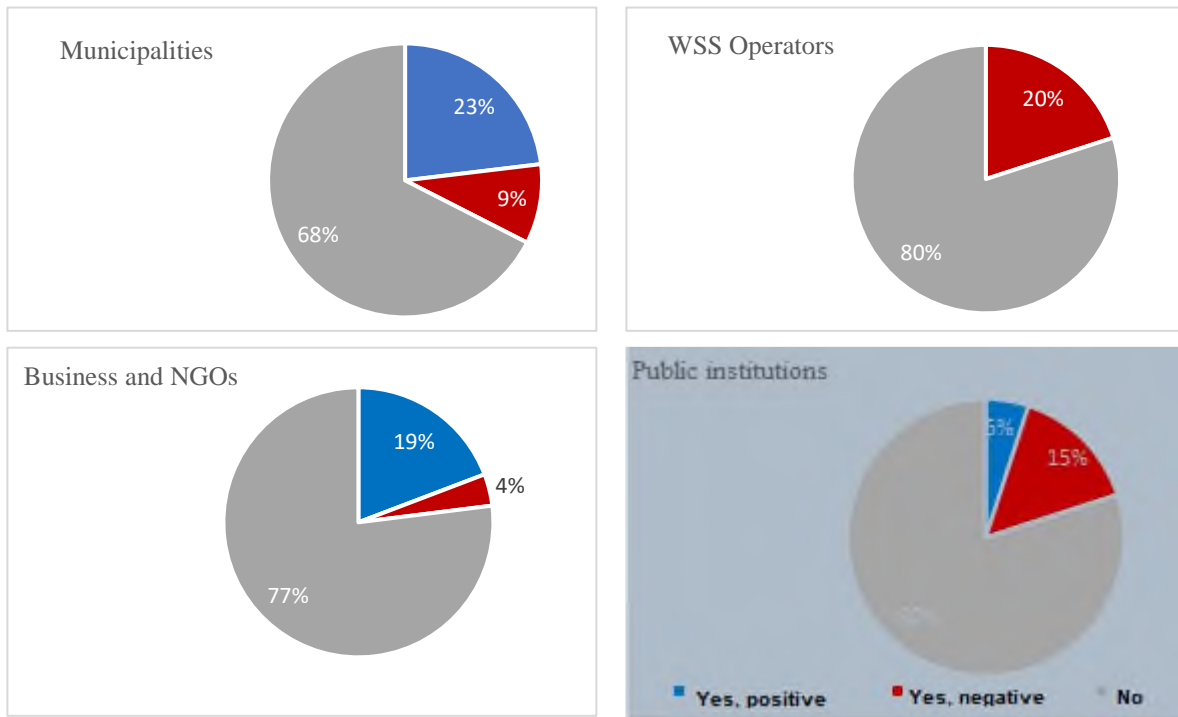
Table 24. Own contribution of the beneficiaries on the individual axes

Priority Axis	Agreed funds in BGN		
	Total	Own financing	% of own financing
Waters	2,758,679,564	846,048,329	31%
Waste	874,655,514	275,963,220	32%
NATURA2000 and biodiversity	196,659,788	600	0%
Flood and landslide risk prevention and management	206,731,936	28,978,435	14%
Improving the quality of atmospheric air	713,696,517	88,708,008	12%

Source: UMIS 2020

An additional own contribution was provided by the RIA for the investments under PA4 "Prevention and management of the risk of floods and landslides". It should be noted that for part of the projects, a refundable value added tax is also included as an own contribution, which does not represent real additional financing. For example, the own contribution, which is noted under PA2 (waste) and air quality improvement (PO 5), is mainly the contribution of municipalities to cover value added tax.

About one-third of the responding municipalities identified unintended effects from the implementation of their projects (see figure below). The positive consequences indicated by 23% of the respondents are additional to the expected or greater than expected benefits depending on the sector of the project implementation, such as a significant reduction in the amount of household waste deposited and more comfortable and ecological public transport.



Source: Surveys conducted in the period May-June 2023 .

Figure 13 . Answer to the question "Did the implementation of the project lead to unintended effects?"

The other category of additional effects affects the satisfaction and building of positive attitudes towards environmental protection among citizens and, especially, children. These effects are mostly observed in the PA2 demonstration projects and Natura 2000 projects (since the focus is on enhanced communication with the population) and they are related to a change in attitudes and the formation of interest in cooperation for the protection of nature and the environment.

About 10% of the municipalities have also encountered negative consequences from the implementation of their projects, most of which come down to the need for additional financial (unplanned) resources, including to cover imposed financial corrections. Specific problems such as the increase in the price of water (for households) are also pointed out.

Unplanned effects identified by the WSS operators include the need to secure additional/unplanned borrowings as the financial commitment of the WSS companies has grown much more than originally anticipated.

NGOs and business point to the improved communication and motivation for cooperation between interested parties and the created positive attitudes and behavior patterns of the public aimed at protecting biodiversity and protected areas under Natura 2000 as additional positive effects.

Identified unplanned effects of public institutions include loss of funds and inability to fully deploy planned benefits (such as changing the chosen management approach). Additional benefits come down to supporting ecosystem services.

EQ11 What is the achieved integrated net effect of the implementation of the OPE 2014-2020?

It was only possible to analyze the net effect of the implementation of the OPE through a counterfactual study in relation to the specific target of PA2-waste. Due to the small time

span of the observations and the limitations in the data, the results are imprecise and need to be confirmed with data from observations in the following years.

The net effect of OPE implementation was investigated through a counterfactual study. Such a study was only possible for PA2 interventions aimed at achieving the specific objective of "*Reducing the amount of landfilled household waste*". The analysis covers projects that were implemented under four of the PA2 procedures:

- 2.002 "Combined procedure for design and construction of composting installations and installations for preliminary treatment of household waste";
- 2.005 "Design and construction of composting installations for separately collected green and/or biodegradable waste";
- 2.006 "Second combined procedure for design and construction of composting installations and installations for preliminary treatment of household waste"; and
- 2.007 Completion of the project "Implementation of a decentralized model for bio-waste management in one of the waste management regions in Bulgaria, including construction of the necessary technical infrastructure - a system for separate collection and a facility for recycling the collected bio-waste".

The municipalities that are included in **the impact group** participated in a project under one of these four procedures (as a lead municipality or as a partner) and the project was completed before 2022. Procedure 2.004 "Design and construction of anaerobic installations for separately collected biodegradable waste" is not included, as there are no completed projects on it yet. Data from UMIS show that 22 municipalities meet these conditions.

A control group has been formed, which includes municipalities that do not implement or have not implemented projects for the construction of composting installations and installations for the preliminary treatment of household waste under OPE 2014-2020 and OPE 2007-2013. The control group includes 44 municipalities for which there is data on the amount of household waste deposited.

The purpose of the analysis is to establish a causal relationship between PA2 interventions by examining the amounts of household waste in municipalities that have implemented projects under the four procedures, compared to those municipalities that do not have projects aimed at household waste under OPE.

The municipalities that have built pre-treatment plants and composting plants under OPE 2007-2013 were analyzed separately. A comparison was made between the results of these municipalities and the control group. The hypothesis of the complementary analysis is that the longer period that has passed since the end of the project and the actual entry into use of the installations allows a clearer identification of the effect of the intervention.

The variable that was studied is "*Deposited amounts of household waste per capita*". NSI is the source of population data by municipality. Data on the amount of landfilled household waste in the respective municipalities for the period 2017-2021 were obtained from the EEA^{92 93}.

The data on household waste by municipality and year is incomplete – there is not always information for each year of the period 2017-2021 for each municipality. In addition, the data do not allow the study of trends in the dynamics of landfilled municipal waste by municipality, as the changes between two adjacent years are often significant and difficult to explain. These features of the landfilled household waste database affect the results of the analysis. Since the analysis compares the average values of the studied variable in 2017 and in 2021, if there is no data for the respective year for a given municipality, then the values for 2018 and 2020 are used, respectively.

The difference-in-differences method was used to calculate the net effect (impact) of the interventions. With this method, the data on landfilled household waste per capita for the target and control groups are compared before and after the intervention (second difference). By calculating the difference in differences between the two groups, a 'net' effect of the intervention is obtained.

The net effect was calculated both for all municipalities included in the impact group and the control group, as well as for two sub-groups - municipalities with up to 20,000 inhabitants and municipalities with more than 20,000 inhabitants.

A list of the municipalities included in the impact group, in the control group and in operations under OPE 2007-2013 is attached in Annex 7. The results obtained are presented in the same appendix.

Comparing the results of the municipalities supported under OPE 2007-2013 and OPE 2014-2020 with municipalities from the control group does not prove the existence of the desired net effects.

The results of the comparison between the exposure group and the control group presented in the appendix cannot be considered credible and reliable due to the following main limitations:

- As no data was available for 2022, it was not possible to observe longer-term trends and effects.
- The data that were provided by the EEA are for the period 2017-2023. As under the provisions of the Waste Management Act, data is kept for a period of 5 years, it was not possible to obtain data for earlier years such as 2014, 2015 and 2016, as was our original intention.
- Only 5 of the projects in the impact group were completed in 2020, so that the 2021 data could fully capture their contribution. The remaining 15 projects have ended in 2021, so the contribution from the projects is at best partial.

⁹² The conducted online survey among municipalities contained a question about the amount of landfilled household waste of a given municipality. Data from the survey were not used for the purposes of the counterfactual analysis, as the number of municipalities that responded to this question was very small (only three of the municipalities included in the impact group provided data).

⁹³ According to the Waste Act, waste data submitted by the municipalities is stored by the EEA for a period of five years. EEA does not control the quality of submitted data.

- Limitations of the data used, which were noted above (such as the significant differences in the data for one municipality in two adjacent years).

EQ12 What is the contribution of ESIF support through OPE 2014-2020 to achieving the goals of the horizontal principles addressed in the program - sustainable development, equal opportunities and non-discrimination, gender equality?

Sustainable development is the horizontal principle that is integrated to the greatest extent in the processes of preparation and implementation of the OPE. Most of the OPE indicators can be used to report the contribution of the program to the achievement of the objectives of the principle of sustainable development, including environmental protection, resource efficiency, biodiversity conservation, risk prevention and management and achievement of climate change targets.

The principles of partnership, equal opportunities and non-discrimination and gender equality are implemented through compliance with national legislation through the work of the MC, where all stakeholders are represented, as well as when preparing the application conditions.

Sustainable Development

OPE makes a specific contribution to the horizontal principle of sustainable development, by financing measures that have a direct contribution to environmental protection, promotion of resource efficiency, adaptation to climate change and risk prevention and management. OPE 2014-2020 made significant investments in environmental infrastructure and services aimed at promoting sustainable development in Bulgaria. These investments help to improve the quality of the environment, reduce pollution and promote the sustainable use of natural resources. OPE 2014-2020 in Bulgaria invests in environmental infrastructure and services. These investments help improve air and water quality, waste management and disaster risk reduction, as well as promote the sustainable use of natural resources and improve the state of biodiversity.

In the report for 2022 OPE MA reports over EUR 318 mln of program support used for climate change objectives:

Table 25. Support used for climate change purposes

PA	Amount of support to be used for climate change purposes (in EUR)	Share of the total amount of funds allocated to the operational program (%)
PA1	36,997,598.83	4.73%
PA2	87,254,845.60	4.19%
PA3	29,023,774.57	36.79%
PA4	56,088,404.21	72.11%
PA5	108,831,095.61	41.12%
Total	318,195,718.82	21.58%

Source: Report on the implementation of the OPE for 2022.

Most of the measures supported by the program contribute to the goals of sustainable development, and the contribution can be measured through the indicators set in the program.

Partnership and multi-level governance

The meetings of the MC have provided an opportunity to monitor and discuss the implementation of the program and decision-making by all interested parties, among which are: representatives of trade unions, national representative organizations of employers; members of the national association of municipalities; representatives of regional development councils; the academic community; the national representative organizations of and for people with disabilities; and non-governmental organizations in the following areas: equality between men and women and non-discrimination; social inclusion and integration; association of consultants; environmental organizations; organizations working in the field of education, science and culture.

In addition, the work of the MC has contributed to the realization of a partnership with representatives of the managing bodies of other operational programs; other ministries and administrations; Commission for Protection against Discrimination; National Statistical Institute and state agencies or directorates, key beneficiaries of the program, the Public Procurement Agency and the State Agricultural Fund, the audit and certification body and the European Commission.

All beneficiaries interviewed shared that they were consulted during programming. In addition, most are of the opinion that the relationship with the OPE MA is a partnership, which gives them the opportunity to make suggestions and make their voice heard.

The work of the MA in partnership with the interested parties within the framework of the implementation of the OPE 2014-2020 has contributed to increasing the administrative capacity of the beneficiaries.

Promotion of equality between men and women and non-discrimination

OPE does not provide for the implementation of specific measures for the promotion of equality and non-discrimination. These principles are respected through the application of national legislation. In this regard, no specific actions to comply with the principle have been reported under the programme.

EQ13 What is the impact of the implementation of financial instruments under OPE 2014-2020? What are the external factors that influence the implementation of financial instruments under the OPE 2014-2020, what is the impact (positive/negative) and to what extent? What is the net result of using FI - the ratio of costs and administration to benefits?

The execution of financial instruments is far below the expected volumes. In PA1, only 5 contracts were concluded with WSS operators. Within the framework of the PA2 instrument, no FI contracts have been implemented, despite the updated preliminary evaluation for the implementation of FI and expansion of the scope of eligible activities under PA2 in the program.

The large administrative burden, as well as the offer of products that are not more attractive than the conditions offered by the banks, are the main reasons for the low absorption of the

resource allocated for FI under PA1. Under PA2, FIs are not applicable due to limitations in support and low interest from the designated final recipients.

The financial instruments are used for a cost-effective response to special market needs that correspond to the objectives of the OPE and are planned so as not to displace private financing, according to Regulation (EU) 1303/2013 the financial instruments supported by the European Structural and Investment Funds. With a view to complying with this requirement of Regulation 1303/2013, the decision to finance support measures through financial instruments was taken on the basis of a preliminary assessment, in which market inefficiency or a suboptimal investment situation were identified and the expected level and scope of the needs of public investments.

In 2018, in connection with an identified change in the investment environment, the market failures in the Water sector and the Waste sector were re-examined, with a view to assessing whether they still exist, whether their consequences have been mitigated or whether new market failures have appeared. The conclusion of the updated evaluation is that some positive changes are being observed, mostly in connection with the implementation of the reform in the WSS sector. In the "Waste" sector, the situation is assessed as more static, and again the presence of market failures in the sector, the overcoming of which is one of the objectives of the application of financial instruments, has been established. Considering the stability of the banking sector at the time of preparation of the update, the interest of commercial banks in the considered sectors is assessed as weak, but possible for some types of instruments.

PA1 "Water"

In July 2018 (20.07.2018) a financial agreement was concluded between the OPE MA and FMFIB EAD for the provision of support through financial instruments in the "Water" sector with a budget of BGN 234 million.

On 12.12.2018, an annex to the agreement was signed, with which the resource for FI increases to BGN 282 million. The European Bank for Reconstruction and Development (EBRD) was selected as a financial intermediary, with which FMFIB EAD signed an agreement on 04.10.2018 without conducting a public procurement, due to their status as an international financial institution. The agreement is for a total resource from ESIF in the amount of BGN 233 million, of which the MA has committed BGN 124 million plus BGN 10 million for technical assistance.

The purpose of the technical assistance was to support the implementation of the projects, as well as to strengthen the financial situation of the water supply operators in order to ensure the sustainability of the investments. Pursuant to Article 2, Item 64 of the Financial Regulation⁹⁴, "technical assistance" means support and capacity-building activities necessary for the implementation of a program or activity, in particular preparation, management, monitoring, evaluation, audit and control activities. Therefore, it could not be used for the purpose for which it was planned.

The first contracts with WSS operators were signed in February, August and September 2019. As of 2023, the beneficiaries who have signed FI contracts under the WSS instrument are a total of 5 - Ruse, Smolyan, Vratsa, Stara Zagora and Burgas.

⁹⁴<https://eur-lex.europa.eu/legal-content/BG/TXT/?uri=celex%3A32018R1046>

The reason for the low number of signed agreements is the insufficient attractiveness of the FI (insufficiently attractive financial conditions combined with a large administrative burden) against the background of the offered market financing.

According to FMFIB data, 9 beneficiaries used funds from other sources: WSS Varna from UBB, WSS Vidin from Allianz, WSS Plovdiv - from Raiffeisen Bank. Kardzhali and Yambol used funds from FLAG. WSS Pernik, Shumen and Sliven used loans from Bulgarian W&S Holding EAD, due to their poor financial condition.

Table 26. Allocation of funds under FI contracts

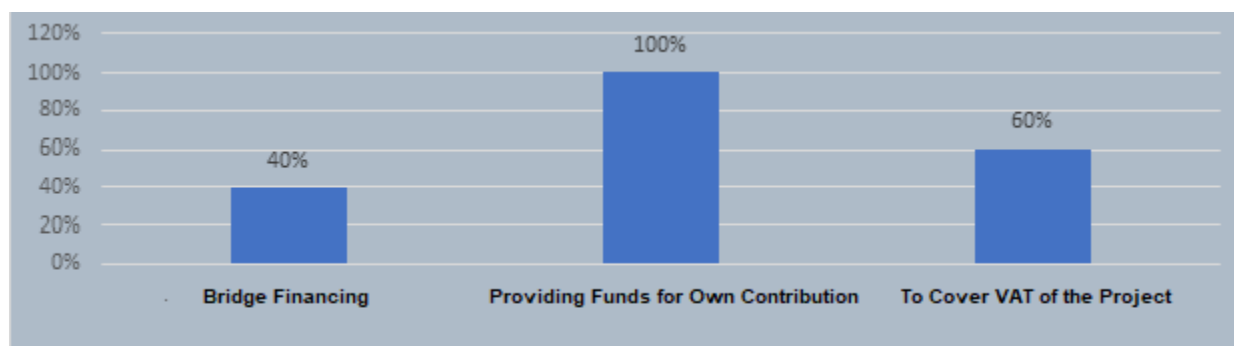
Beneficiary	Funds from ESIF million EUR	Funds from the EBRD million EUR	Total
WSS Ruse	2.80	4.40	7.20
WSS Smolyan	2.70	1.60	4.30
WSS Vratsa	1.35	1.35	2.70
WSS Stara Zagora	2.40	3.70	6.10
WSS Burgas EAD	7.30	8.00	15.30

Source: OPE MA

The total amount of the concluded 5 FI contracts from all 15 projects of OPE 2014-2020 is EUR 35.6 million. According to the terms of the FI, the interest on the loans is charged based on a margin that varies according to the financial indicators of the waterworks operator (1.85%, 2.00% and 2.15%), as well as the interbank interest rate for the period in which the loan payment is made.

In addition, the EBRD has announced a procedure for the selection of commercial banks to grant loans to the WSS operators against a guarantee issued by the EBRD. Two banks were selected from a total of three applicants. However, the guarantee instrument has not been implemented in practice.

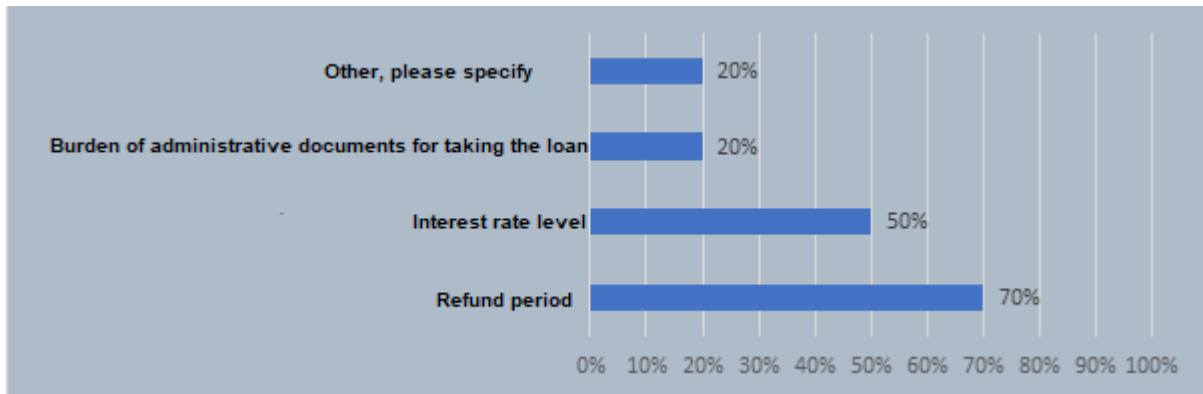
According to the conducted survey (see the figure below), water and sanitation operators used the funds to cover their own contribution to the project, 60% used borrowed funds to cover VAT, and 40% - for bridge financing. From this information it follows that for one or more purposes all operators need financing, i.e. cannot provide funds from the companies' budget.



Source: Conducted survey among WSS operators

Figure 14 . Purpose of FI financing

A key question regarding FIs is whether the terms of the FIs are better than the market ones and whether they cover a specific market defect, such as taking a higher risk with some of the companies. According to data collected by conducting a survey (see the figure below), 70% of the WSS operators chose the source of financing the own contribution according to the loan repayment term, for 50% the main factor was the interest rate, for 20% the administrative burden was decisive, and for another 20% - fees and penalty interest or that they had no choice.

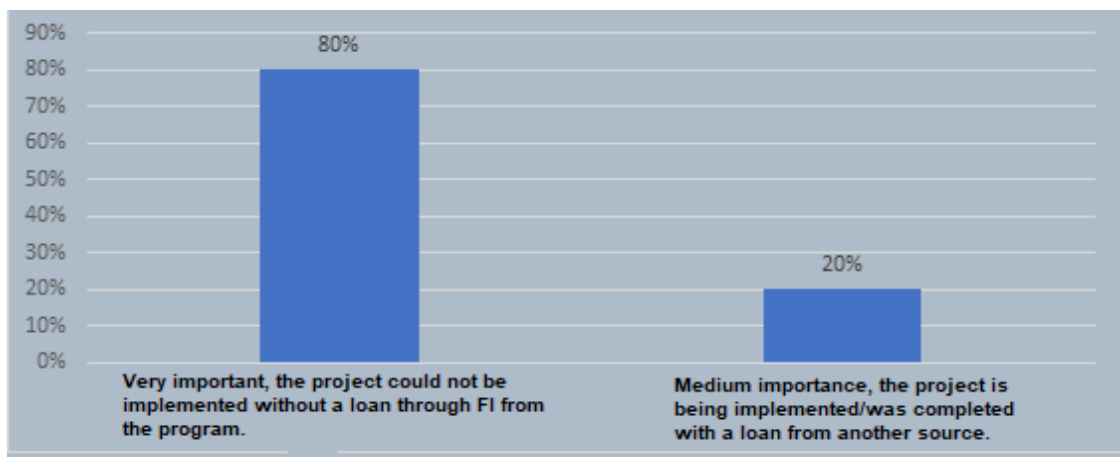


Source: Conducted survey among WSS operators (respondents had the right to indicate more than one answer)

Figure 15 . Reason for choosing the funding source

On the other hand, some of the WSS operators have concerns about whether they will be able to meet the IFI rules, which include environmental ones, as well as the significantly higher administrative burden and slower work process compared to commercial banks. WSS operators do not have the capacity to prepare loan requests, nor the motivation, given the comparable, and in some cases, more favorable conditions that they can use with commercial banks.

One of the answers to the questions shows that some of the WSS operators do not differentiate between FI and bank loan (see the figure below). While only 5 operators contracted for FI, eight claimed that without FI their project would not have been able to be implemented. The implications of this are twofold – on the one hand, if the beneficiaries do not see a difference between the conditions of FI and loans from commercial banks, then they do not differentiate between the two. On the other hand - if, due to lack of information, the beneficiaries do not expect better conditions when using the FI, they may directly contact the banks without comparing their conditions with those of the FI. In all cases, it is good for the beneficiaries to have a clear idea of what they can get from the FI.



Source: Conducted survey among WSS operators

Figure 16 . Degree of importance of FI support

The level of implementation of FI under PA1 is presented in the table below.

Table 27. Level of implementation of financial instruments under PA1 "Waters"

14. Total amount of program financial contribution committed in the funding agreement (in EUR)		136,382,412.2	
14.1. of which ESIF participation (in EUR)		115,925,050.4	
15. Total amount of program financial contribution paid to the financial instrument (in EUR)	34,095,603.05	FI implementation percentage	25.00%
17. Total amount of management costs and management fees paid with program funds (in EUR)	1,481,091.66	Proportion of costs and management fees from the total amount of the program's financial contribution	1.09%
17.1. of which for basic remuneration (in EUR)	1,264,834.99	Share of cost of basic remuneration of FI intermediaries	85.40%
17.2. of which for performance-related remuneration (in EUR)	216,256.67	Proportion of cost of remuneration linked to FI results	14.60%
39.1. Expected leverage effect for loan/guarantee/equity or quasi-equity investment/other financial product, with reference to financing agreement, by products	1.41	Percentage of fulfillment of the expected leverage effect	162.41%
39.2. Achieved leverage effect at the end of the reporting year for loans/ guarantees/ equity or quasi-equity investments/ other financial product, by products	2.29		

Source: According to data from the Annual Report on the Implementation of the OPE for 2022.

The weak implementation of the instrument is also evident from the small share of remuneration costs tied to the achieved results compared to the total FI resource provided to FMFIB by the program.

The funds attracted by the EBRD are EUR 19 million, compared to EUR 16 million provided by ESIF. In this way, a higher leverage effect is achieved. But the greater funding provided by the intermediary has led to an increase in the cost of the resource and, accordingly, to less attractive conditions for the final recipients, which is one of the reasons for the weak implementation of the support with FI under PA1.

The implementation of the FI is at the level of 25% of the planned. However, this does not reflect the actual level of FI allocation to final recipients, but only the transfer of funds from the program to FMFIB. Management costs and management fees paid with program funds are 1.09%. Bearing in mind that 9 projects under PA1 were financed under market conditions, i.e. management costs are paid by the beneficiaries and not by the programme, the benefit of FI structuring is limited. On the other hand, despite the small number of FI-financed projects under PA1, FI and market credits have a disciplining effect on beneficiaries and, accordingly, implementation, and overall there is a net benefit from the implementation of FI under PA1.

PA2 "Waste"

Within the framework of the updated preliminary evaluation for the implementation of the 2018 FI in the "Waste" sector, it is proposed that ready-made projects for the construction of reuse centers and installations for the recycling of non-biodegradable waste be pilot-financed with FI.

Annex to the financial agreement signed in 2017 for the provision of support through FI in the "Waste" sector with the aim of changing the term for the selection of financial intermediaries enters into force with the adoption of the update of the investment strategy for the implementation of FI by the OPE MC in 2018.

In the selection of financial intermediaries, FMFIB works slowly, due to the implementation of the PPA. At the same time, during the COVID-19 crisis, the measures were open to all banks and no procedures were carried out. This is a possibility that could also be considered in the future in order to avoid delays in conducting the procedures for the selection of mediators.

After updating the preliminary evaluation in the direction of changing the permissible activities and FI for direct provision of loans in partnership with a bank, 10 candidates appeared. OPE has not agreed on the provision of financial resources from OPE through FI for the presented project proposals. The reasons for the disagreement are mainly due to the inadmissibility of the financing proposals for OPE, incl. by FI, for example for incineration or for pyrolysis. Another example of a non-coordinated project proposal from the OPE MA is for the intention to build a separation plant at the landfill of Razlog municipality, due to the lack of an identified need for such an investment for the Razlog WWTP in the annexes to the NWMP, which also makes the investment ineligible for funding under the program. On the other hand, the interest is weak, since the measures that are supposed to be financed with FI (reuse centers) do not generate enough income.

According to the procedure "Provision of financing under priority axis 2 "Waste" of OPE 2014-2020 for financial instruments", no contracts were concluded with final recipients and the exit strategy provided for in clause 3.4.3 of the Financial Agreement was implemented. On 25.01.2022, a letter was submitted with a request to terminate the Financial Agreement. The same was terminated by a Termination Agreement dated 21.04.2022. The released funds were used to provide the necessary financial resources for the implementation of projects within the landfill reclamation procedure.

The level of performance of FI under PA2 is presented in the table below.

Table 28. Level of implementation of financial instruments under PA2 "Waste"

14. Total amount of program financial contribution committed in the funding agreement (in EUR)		26808253.21	
14.1. of which ESIF participation (in EUR)		22787015.23	
15. Total amount of program financial contribution paid to the financial instrument (in EUR)	6,702,063.30	FI implementation percentage	25.00%

17. Total amount of management costs and management fees paid with program funds (in EUR)	302,878.19	Proportion of costs and management fees from the total amount of the program's financial contribution	1.13%
17.1. of which for basic remuneration (in EUR)	302,878.19	Share of cost of basic remuneration of FI intermediaries	100.00%
17.2. of which for performance-related remuneration (in EUR)	0.00	Proportion of cost of remuneration linked to FI results	0.00%

Source: According to data from the Annual Report on the Implementation of the OPE for 2022.

In view of the fact that under PA2 there are no signed FI contracts, the costs of managing the FI under PA2 represent a net loss for the program.

SUSTAINABILITY

The sustainability of the OPE 2014-2020 interventions is considered in the following aspects:

Usefulness of the realized results - to what extent the beneficiaries recognize the realized products and results, have a need for them and a desire to accept them and take care of them in the future.

Financial sustainability - to what extent is ensured the possibility of continuing the existence/operation of the completed under OPE 2014-2020 (operating costs, maintenance costs, additional investments).

Sustainability of environment and climate change policies – the extent to which the supported priorities, areas and interventions continue to be a priority for the next programming period.

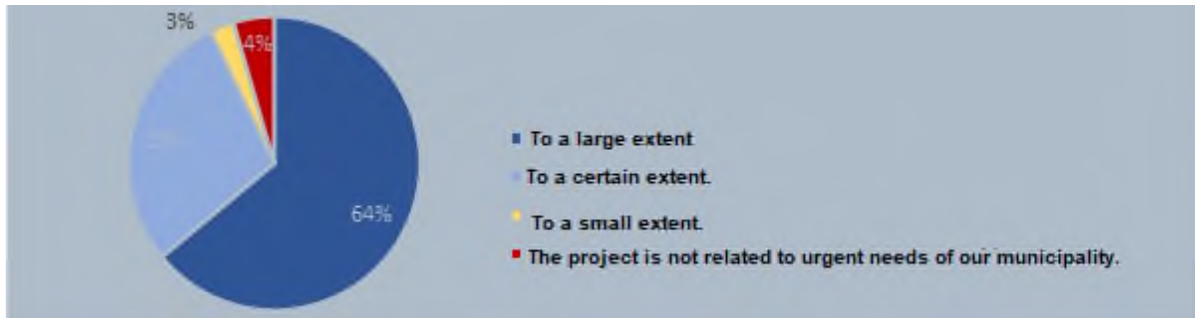
EQ14. What is the sustainability of the interventions under the OPE 2014-2020, considered as a ratio between the identified needs and the achieved results?

The achieved results of the projects are useful for the beneficiaries and will continue to be needed. In this sense, the interventions under the OPE 2014-2020 are sustainable.

Beneficiaries who participated in the conducted survey differ in their opinion regarding the degree of satisfaction of needs.

The majority of 111 municipalities that implemented projects with OPE financing and participated in the survey consider that they meet the urgent needs of the municipalities to a

large or certain extent, while only about 7%⁹⁵ (mostly municipalities with PA2 investments), believe that this is not the case (see the figure below).



Source: Conducted survey among municipalities within the framework of the assessment

Figure 17 . Degree of coverage of the urgent needs of the municipalities

Municipalities carry out investments in almost all directions of support under OPE - in water and sanitation infrastructure, in installations for composting and pre-treatment of household and biodegradable waste, rehabilitation of dams and strengthening of landslides and measures to improve air quality, including replacement of heating devices with more ecological ones and ecological urban transport. Some municipalities with projects under CLLD also carry out conservation activities for habitats and species.

Out of a total of 10 water and sanitation operators who participated in the survey, 4 believe that the projects fully cover the needs in the water and sanitation sector, and the remaining 6 - that the interventions meet the needs, but there is more to be done, especially in terms of insufficient resources to cover of the needs and not so much to the financed investments.



Source: Conducted a survey among the beneficiaries

Figure 18 . Level of coverage of needs in the water and sanitation sector

On this issue, additional information was gathered from the meetings held with representatives of the Ministry of Regional Development and Bulgarian Water and Sewerage Holding EAD. It has been commented that in terms of needs, results are being achieved that are legally required at the moment, and at the same time European legislation imposes new and even higher requirements. The Directive on the quality of drinking water imposes higher requirements on WSS operators. The project of a revised Wastewater Directive is very ambitious and covers agglomerations with over 1000 inhabitants, and Bulgaria is currently negotiating a derogation.

Furthermore, in order to achieve resource efficiency, in this case saving water, investments in technological solutions for saving water and energy are necessary. Examples of such are

⁹⁵PA1 - 1, PA2 - 5, PA4 - 1, PA5 - 1

digitization, the placement of area measuring devices, as well as modeling software solutions. In this way, it will be possible to make simulations and prevent accidents.

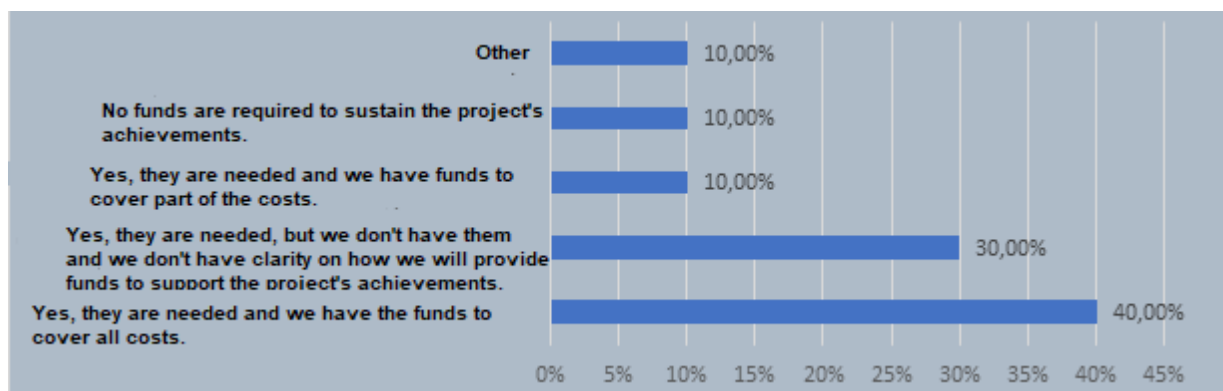
Supported projects generally meet the needs of institutional beneficiaries. Only 15% of the surveyed institutions believe that it would be good to support other measures in order to more fully meet the needs in the "Natura 2000 and biodiversity" sector. Proposals for such include renovation of roads to important habitats, purchase of land in nature parks, measures to maintain and restore the conservation status of natural habitat types and species, including after purchasing lands from private owners.

EQ15. What is the financial sustainability of the interventions by type of intervention?

The financial sustainability of OPE 2014-2020 interventions is generally good. Although there is a probability of problems with ensuring the financial sustainability of the projects achieved under interventions with different types of beneficiaries, the same is within 20% of the interventions with beneficiaries municipalities and public bodies and up to 30% with beneficiaries legal entities with economic and non-profit and WSS operators.

Financial sustainability refers to the availability of sufficient financial resources to sustain the intervention after the end of the project.

The WSS operators, beneficiaries under PA1, suffer from a constant shortage of funds, including for infrastructure maintenance. Some WSS operators are experiencing financial difficulties, especially after the imposition of 25% financial corrections. Only 10% of water and sanitation operators who participated in the survey claim that no funds are needed to maintain the achievements of the project financed by the OPE 2014-2020, and another 10% do not specify. All others state that funds are necessary, with 40% of all having the necessary funds, another 10% partially having the funds, and 30% not having the funds to cover the expenses. I.e. according to survey responses, for 30% of projects there is a risk to financial sustainability after project completion.



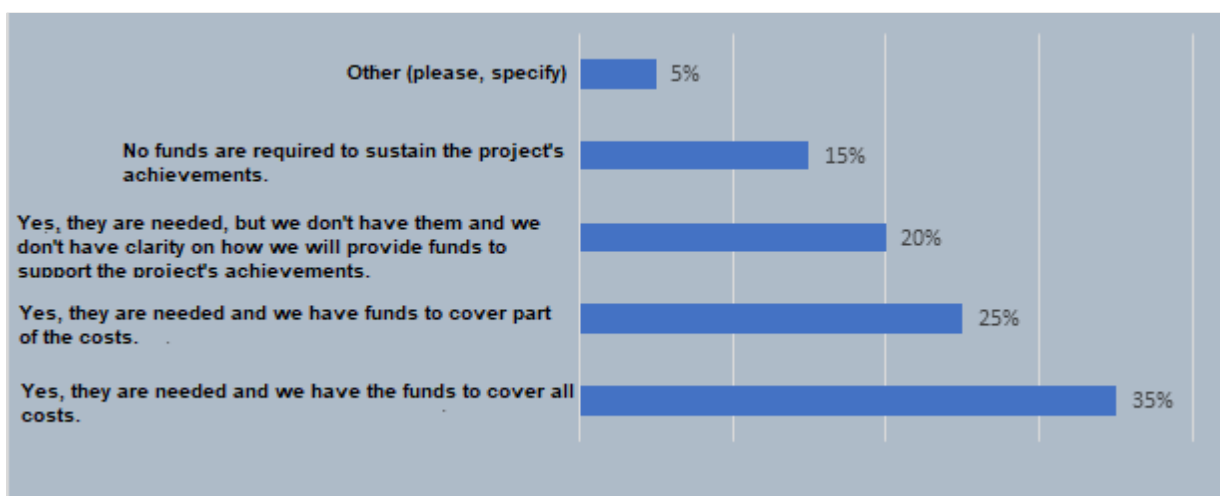
Source: Conducted survey among WSS operators

Figure 19 . Necessity and availability of funds to maintain the facilities built according to the projects of the WSS operators

WSS operators receive income mainly from water supply. In this regard, according to the respondents, the only way to improve their financial situation will be to increase the price of water. However, this is not always possible to the required levels and at the required rates, as this service is regulated (subject to control by CEWR) and is limited to the ceiling of social tolerance.

Another way to improve the financial situation of water and sanitation operators is to lower their costs. WSS operators have high electricity bills. The provision of autonomous sources of energy, such as photovoltaic plants, etc. would improve their financial sustainability. If they fail to improve their financial situation, there is a risk to the sustainability of the projects. According to the latest CEWR report⁹⁶ for the development of the WSS sector, it is essential to optimize the costs of electrical energy for technological needs, in addition to the implementation of energy efficiency measures, the production of electrical energy from own renewable sources. In 2021, the water and sanitation sector produced electricity from its own sources, representing 5.5% of the total reported electricity used.

In case of public institutions, beneficiaries under PA3, about 20% do not have clarity on how to provide funds to maintain the achievements of the projects, and another 25% only have a part of the funds available (see the figure below).



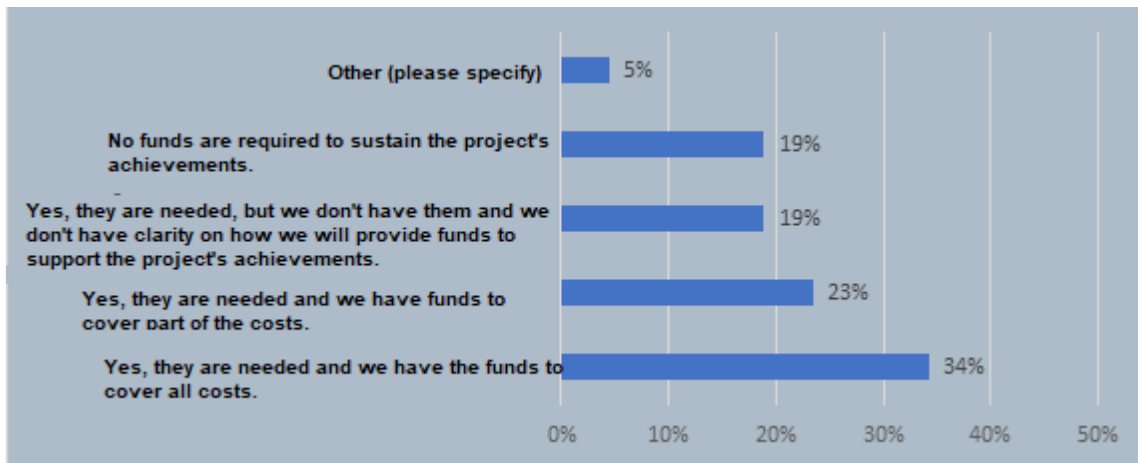
Source: Conducted survey among public institutions

Figure 20 . Need and availability of funds by beneficiary public institutions

Half of the public institutions rely on funds from the state budget, and about 40% also rely on economic initiatives. Donors, own funds and public-private partnerships are also possible sources of funding for about 8% of respondents. There is still no clarity on the maintenance of the established water management system, including staffing.

In general, municipalities have no difficulty securing maintenance funding. Most of them deal with the provision of financing for the maintenance of the infrastructure built according to the projects or the equipment acquired (see the figure below). Over 90% of municipalities rely on their own funds for this .

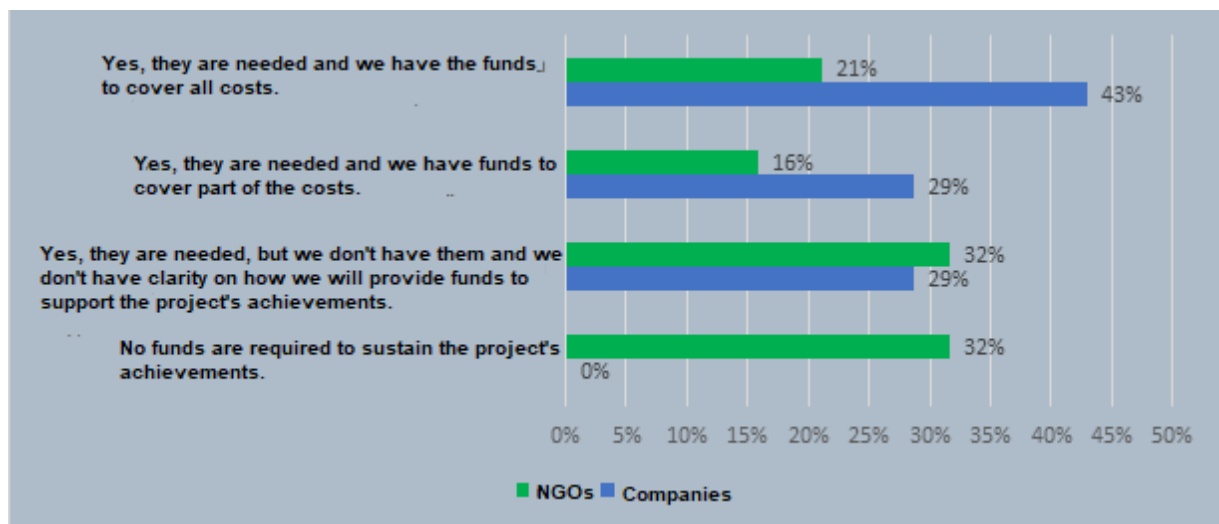
⁹⁶Annual report and comparative analysis of the state of the WSS sector in the Republic of Bulgaria for 2021, November 2022.



Source: Conducted survey among municipalities

Figure 21 . Necessity and availability of funds to support the projects implemented by the municipalities

About 30% of beneficiaries, business representatives or NGOs encounter problems in securing funding to sustain project achievements (see figure below).



Source: Surveys conducted

Figure 22 . Legal entities with a commercial and non-commercial purpose that have a need for operating costs to maintain the project's achievements

But as can be expected, the differences between the two groups are large - nearly 71% of businesses have all or part of the funding needed to sustain the project's achievements, while 29% have no clarity on how they will secure it. In contrast, in the NGO sector, only 37% have fully or partially the necessary funds, and about 32% encounter difficulties in providing them. In 27% of NGO projects, there is no need for funding to ensure the sustainability of the results, or sustainability will be ensured by voluntary work (5%).

The main sources of funds for companies are business initiatives and public-private partnerships, followed by donors, in the case of NGOs, state and municipal budgets and own funds.

In summary, according to the survey, the beneficiaries who estimate that they have a need, but at the same time do not have the means to cover the costs and do not have clarity about how

they could provide them, are 30% of water supply operators, 30% of legal persons with commercial and non-commercial purposes, 19% from municipalities and 20% from public institutions. However, for all beneficiaries, the rate of possible financial difficulties is relatively low, which is why it can be argued that the financial sustainability of the interventions supported by the program is good.

EQ16 What is the sustainability of support for environment and climate change policies?

Support under OPE 2014-2020 is sustainable as it is tied to European and national strategic goals. The interventions supported under OPE continue to be a priority for the next program period as well. At the same time, the lack of a clear and generally accepted strategic vision for the development of some of the sectors subject to intervention (Waters, Natura 2000) has an adverse impact on sustainability.

The presence of a favorable political, economic and social environment that supports the continuation of the intervention is part of the overall **external sustainability** of program support.

According to most of the interviewees, the political instability in the country has affected the implementation of the projects, but not the goals and the correspondingly identified needs. Funding under the program is targeted at priorities that are fully in line with EU policy, making the funding politically sustainable.

At the program level, there is undisputed policy resilience. The planned support under the Environment Program 2021-2027 builds on the results of 2014-2020 (see table below). In the new period, interventions under the same priorities will continue to be supported.

Table 29. Correspondence between the priorities of OPE 2014-2020 and PE 2021-2027.

Priority under OPE 2014-2020	Priority under PE 2021-2027.
Priority axis 1 "Waters"	Priority 1 "Waters"
Priority axis 2 "Waste"	Priority 2 "Waste"
Priority Axis 3 "Natura 2000 and Biodiversity"	Priority 3 "Biodiversity"
Priority axis 4 "Flood and Landslide Risk Prevention and Management"	Priority 4 "Risk and climate change"
Priority Axis 5 "Improving Ambient Air Quality"	Priority 5 "Air"
Priority axis 6 "Technical Assistance"	Priorities of technical assistance Article 36, Paragraph 4 of the CPR and Art. 37 of the CPR
Priority Axis 7 "Support for Refugees from Ukraine in Bulgaria"	None

In the Water and Biodiversity sectors there is a lack of consensus among stakeholders and legislative changes that are important for future development and policies in the water sector and Natura 2000 management are still under discussion. This has an adverse effect on sustainability.

A potentially adverse impact is also possible in a situation in which, due to constraints (social affordability of the price of water), investments in water supply will not be able to be fully repaid by water consumption charges.

In the field of air, the sustainability of the effects of measures to replace heating appliances with more environmentally friendly ones (mainly air conditioners and pellet stoves) is vulnerable to an increase in the price of electricity and energy carriers. In this regard, the measure under the Recovery and Resilience Plan for investments in photovoltaic systems for households heated with solid fuel has a positive complementary effect.

IV. Conclusions and Recommendations

CONCLUSIONS

Efficiency

Due to the specifics and nature of the implemented infrastructure projects, by the middle of 2023 only in some areas the set goals have been achieved or close to achieving. These are: water bodies with improved monitoring of the chemical status and updated analytical/program/strategic documents in the field of water management; reclaimed landfills; habitats supported to achieve a better degree of conservation; areas with improved flood protection.

A large part of the projects are still in progress. Key interventions contributing to the achievement of program objectives such as the project of the Sofia Municipality for the construction of a cogeneration plant with the utilization of RDF (prolonged appeal procedures) and the investments in building the capacity of the new management structures of the Natura 2000 network (lack of approval of the proposed amendment in the regulatory framework) have not been implemented. Some of the WSS projects are planned to be implemented in stages during the next program period.

The execution of the financial instruments is far below the expected volumes. According to PA1, only 5 contracts were concluded with WSS operators (out of 14 supported by GA). Within the scope of the PA2 instrument, no support contracts with FIs have been implemented.

A brief overview of the achievement of the objectives by priority axes is presented below:

PA1 Waters: 12 investment projects for water and sanitation infrastructure of municipalities have been completed, and five are still in progress. All 14 projects of WSS operators, as well as the project of the Sofia Municipality, are being implemented. Five of the supported projects are expected to be completed in the period 2021-2027. Accordingly, as of the period under review, the performance indicators show still little progress: 232,157 inhabitants (17% of the target value) have improved access to water supply, and the removed and treated load of waste water amounts to 793,970 cubic meters (67% of the planned). 16 of the planned 25 (64%) wastewater treatment plants have been built or renovated. Progress has been made in improving water monitoring and management, but there are again delays in the implementation of key projects.

PA2 Waste: Composting plants and plants for preliminary treatment of household waste were built for 10 Regional Waste Management Associations, serving 36 municipalities, as well as 12 plants for composting separately collected green waste, serving 16 municipalities. A recycling capacity of 98,636 t/year of waste has been created with a set goal of 240,000 t/year, which, if all contracts in execution are successfully completed, is likely to be achieved at around 96%. The project for the construction of an installation for combined energy production in Sofia will not be implemented under the OPE. Good progress has been made in the reclamation of landfills, where as of September 2023, 55 of the 57 landfills planned for reclamation have already been reclaimed.

PA3 Natura 2000 and Biodiversity: A large part of the measures to improve the environmental protection status of habitats and species are still being implemented, as well as various analyzes

and studies. The target for the area of habitats supported to achieve a better degree of conservation by June 2023 has been achieved at 78%, and that for the area of habitats of species - at 34%. There has been no significant progress in developing the management approach for the Natura 2000 network because the necessary legislative changes have not been adopted.

PA4 Prevention of the risk of floods and landslides: The planned six regional centers for increasing the preparedness of the population in case of floods have been established. Crisis response capacity is expected to be strengthened through the construction of a flood risk management information system, expansion of the early warning and disclosure system. Flood Risk Management Plans for the period 2022-2027 are expected to be developed, as well as a pilot system for the Iskar river for a National Real Time Water Management System. Three municipalities have renovated dam walls and their facilities. The goal of reducing the number of areas at risk of flooding has been achieved. 32.90 ha of landslides have been strengthened. Two contracts are in progress, according to which it is expected that another 64 ha will be strengthened, which will exceed the set goal. Built and restored control and instrumentation systems in registered landslide areas for monitoring landslide processes.

PA5 Air: The majority of contracts for replacement of heating devices with more environmentally friendly ones are still being implemented. At the same time, the goals set for the projects that are being implemented indicate that, upon their successful completion, the projects can be expected to contribute to reducing the amount of FPM by a total of nearly 698 tons/year, which will double the goal. Although most of the green vehicle delivery projects have ended, compared to domestic heating measures, the support for decreasing emissions from public transport has a smaller direct contribution to reducing FPM emissions.

PA6 Technical Assistance The supported measures have contributed to increasing the administrative capacity of the program's MA and the beneficiaries. A high level of awareness of the OPE 2014-2020 has been achieved.

PA7 Support for refugees from Ukraine: Through the Ministry of Tourism, those in need are provided accommodation in hotels and rest centers and the costs of their stay are covered. The priority axis is likely to achieve its goals.

The contribution of ESIF funds to investments in the OPE-supported sectors is substantial, especially in terms of WSS, waste management and air quality improvement, where the invested funds are significant. In the field of water and sanitation, BGN 1.6 billion have been agreed by ESIF, which is more than half of the European funds invested within the program and about 1.4 times more than the national investments, outside of OPE, in the sector for the period 2015-2022. The funds invested by ESIF in the field of waste management amount to BGN 410 million and are about twice as much as the national investments in the field for the same period. European funds invested in projects to improve air quality amount to BGN 531 million. In the area of biodiversity conservation and flood and landslide risk reduction, although ESIF investments are smaller, the support is also significant against the background of limited budget investments.

Efficiency

To a large extent, the weaker implementation of some of the targets is due to the later start of major and key investments in water, waste and air and the subsequent delays in the implementation of the projects. The late implementation of these measures is mainly due to the lack of readiness on the part of the potential beneficiaries .

The design of the interventions was generally responsive to needs. Expanding the scope of FI support and providing more flexible and attractive terms so as to cover needs not supported by the GA will lead to a better use of FI to achieve the objectives of the program.

Difficulties in the application of FI under PA1 are related to the large administrative burden, as well as offering products that are not more attractive than the competitive market conditions offered by the banks. According to PA2, FIs are not applicable, due to limitations in support and low interest on the part of the designated final recipients.

The main problems of the beneficiaries in the implementation are related to the organization of public procurement. OPE is among the programs with the highest share of financial corrections imposed on projects (92% of all projects supported by the program). Other difficulties stem from a lack of experience and capacity; insufficiently effective communication with stakeholders and target groups; and from delays arising from regulatory and permitting regimes.

As good practices in the implementation can be mentioned the work in an electronic environment (UMIS); flexibility and response by the MA to changes in external conditions; consultations with interested parties and support provided to beneficiaries. The MA has shortened the time for approving project proposals and for verifying requests for funds, and is carrying out these activities faster than the statutory deadlines, thereby improving efficiency.

The administrative burden of providing GA is not significant and improvements are being noted in some areas. Only one third of the beneficiaries cite the administrative burden as the reason for the difficulties in the implementation of the projects. According to the beneficiaries, numerous documents and justifications are required for changes in the projects, but the limitations set by the Management of European Funds under Shared Management Act (MEFSMA) in this direction should be taken into account. Submitting the same documents to UMIS for different purposes is an additional administrative burden.

Good practices implemented by beneficiaries include: appropriate planning and implementation of PPA procedures (early start-up and use of framework contracts); good coordination with other actors and stakeholders; application of digital technologies to support management and use of project results and application of innovative solutions.

During the implementation period of the program, a number of external factors had a negative impact. The COVID 19 pandemic and the war in Ukraine are causing delays, and high inflation in the last two years has made it difficult to complete projects within the budgets. The unstable political environment with several caretaker governments hampers the making of political decisions and laws important for the measures supported under the OPE, especially in the field of NATURA 2000 and in the Water sector.

The OPE MA has taken actions to limit and mitigate the negative consequences of various factors on the implementation of the program, including: prepared action plans for projects in progress and with delays; ensuring the possibility of phased completion of projects during the next program period and redistribution of freed financial resources to new procedures.

Adding priority axes to the program that are not related to its objectives increases the burden on the MA.

Impact

Priority investments of OPE 2014-2020 have a direct positive impact on the formation and implementation of environmental protection policies in the financed sectors: water, waste, risk prevention and air quality improvement. In the context of supporting a number of national

policies in the field of ecological transition, the program also contributes to achieving the goals of the Europe 2020 Strategy, the National Development Program of Bulgaria until 2020 . and the National Reform Programs (2020 and 2022).

Although the country continues to significantly lag behind in achieving the objectives for **the collection, removal and treatment of urban waste water** (Directive 91/271/EEC), the program has made a significant contribution to reducing this lag. A contribution is also observed to the improvement of water supply as well as the improvement of monitoring of water resources and water management.

The program makes a significant contribution to achieving the goals in the field of waste in two directions: (1) contributes to the observed trends in the reduction of landfilled **household waste** and the increase of recycled waste; (2) with the **reclamation of landfills** for closure, subject to a procedure for violation of EU law in case C-145/14, the program contributes to the fulfillment of the party's obligation according to the decision of the Court of Justice of the European Union from 16.07.2015 and quicker exit from the regime of sanctions paid by the state.

The program has a limited contribution to **the protection of biological diversity**, given the small share of the OPE initially set in the NFPA to achieve the goals of the Framework. This contribution is hindered and, to some extent, further reduced by the lack of a new management structure of the Natura 2000 network established at national level.

Flood risk management in settlements has been improved and **the risk of landslides and collapses** has been reduced. In the long term, the measures contribute to climate change adaptation and crisis risk management related to natural disasters.

The impact of measures in the field of **air pollution reduction** with FPM is still minimal due to the fact that most projects are under implementation. On the other hand, a synergistic effect is expected in some of the target municipalities, as similar projects are also financed through other programs (LIFE).

The following **additional effects** have been identified: on the one hand, these are displacement effects in investments in water infrastructure, where environmental benefits lead to aggravation of the financial situation of WSS operators and more expensive services for the population. At the same time, a multiplier effect was identified, in which additional resources were added to the funds from the program by the beneficiaries (WSS operators) for investments in waterworks infrastructure.

Analyzes to determine the impact of the program are significantly hampered and limited by the fact that not all projects have been completed and not enough time has passed for the effects to manifest. A major limitation in impact evaluation is also the lack of data for reporting the net contribution from the program. In this regard, the indicators measuring what has been achieved in the field of water infrastructure construction can be supplemented with data on actually constructed water pipes and sewerage network. The data collected by the EEA based on the reporting by the municipalities regarding the deported household waste are incomplete, with large differences in years and are stored only for a five-year period, which undermines the credibility of the analyzes and makes it impossible to outline trends.

Sustainability

The support under OPE 2014-2020 is sustainable in terms of environmental and climate change policies, as it is linked to European and national strategic objectives. The interventions supported under OPE continue to be a priority for the next program period as well. At the same

time, the lack of a clear and generally accepted strategic vision for the development of some of the sectors subject to intervention (Waters, Natura 2000) has an adverse impact on this sustainability.

The achieved results of the projects are useful for the beneficiaries and will continue to be needed.

The financial sustainability is also generally good. There is a potential for problems where the beneficiaries have not provided the necessary funds to fully exploit and sustain the results. The large investments undertaken by the WSSO with a significant own contribution aggravate their financial situation in the short term, and in the absence of the possibility to repay the investments with an increase in the price of water, for some of them it will be a problem to allocate sufficient funds to effectively maintain the infrastructure. In this sense, possible savings from different types of costs, such as those for electricity, which are a significant cost, are one of the possibilities for optimizing their budgets and providing more funds for maintenance.

The cost of electricity and energy carriers is a factor that is likely to affect the future sustainability of measures to replace domestic heating appliances with more environmentally friendly ones.

Municipalities, as a whole, have greater opportunities to maintain the built infrastructure for waste and flood and landslide risk prevention. Only about 19% of the respondent municipalities indicate possible difficulties.

RECOMMENDATIONS

Conclusion	EQ	Recommendation
<p>To a large extent, the weaker implementation of some of the objectives is due to delays in launching key measures, due to a lack of readiness on the part of potential beneficiaries.</p> <p>The design of the interventions was generally responsive to needs. In order to achieve the goals, it is recommended that the program focuses primarily on supporting measures that have a direct contribution to achieving the goals.</p>	EQ1, EQ2, EQ3, EQ7	<p>In order to avoid delays in the implementation of PE 2021-2027 it is recommended:</p> <ul style="list-style-type: none"> • at the beginning of the program MA to start all measures, which it is ready to implement. It is recommended to prioritize measures that have a direct contribution to achieving the goals. • The Managing Authority to analyze the readiness of the beneficiaries to implement measures supporting the achievement of the objectives by drawing up a long list of possible projects, regularly monitoring the level of project readiness and providing technical assistance where necessary to achieve it.
<p>The execution of financial instruments is far below the expected volumes. The difficulties in the application of FI under PA1 are related to the large administrative burden as well as the offer of products that are not attractive. Under PA2, FIs are not applicable due to limitations in support and low interest from the designated final recipients.</p> <p>Expanding the scope of FI support and providing more flexible and attractive terms so as to cover needs not supported by the GA will lead to a better use of FI to achieve the objectives of the program and will improve the sustainability of the measures.</p>	EQ3, EQ13, EQ15	<ul style="list-style-type: none"> • It is recommended that, during the next program period, the MA, in the agreements with FMFIB, should include a clause with the requirement that the financial products for support with FI under PE should be more attractive than those existing on the market. • It is recommended that the FI support be broader than the GA and ensure coverage of additional needs of the final recipients that contribute to the achievement of the program objectives.
<p>Analyzes to determine the impact of the program are significantly hampered and limited by the lack of data to report the net contribution of the program. The systematic collection and storage of data on the achievements is key to carrying out qualitative analyses.</p>	EQ8, EQ11	<ul style="list-style-type: none"> • The OPE MA should consider the possibilities of gathering additional data from the projects, outside of the program indicators, to serve for the analysis of what has been achieved.

Annexes

Annex 1. List of documents used

No.	Document	Source
Legislative and strategic documents		
Horizontal		
1.	Europe 2020 Strategy	Internet
2.	National Development Programme: Bulgaria 2020	Internet
3.	National Reform Programs and Council Recommendations	Internet
4.	Partnership Agreement of the Republic of Bulgaria	Internet
5.	EU Strategy for the Danube Region	Internet
6.	Regulation (EU) No. 1303/2013	Internet
7.	Regulation (EU) No. 1301/2013	Internet
8.	Regulation (EU) No. 1305/2013	Internet
9.	Regulation (EU, Euratom) 2018/1046 on the financial rules and the previous Regulation (EU) 966/2012	Internet
10.	Delegated Regulation (EU) No. 480/2014	Internet
11.	Delegated Regulation (EU) No. 240/2014	Internet
12.	Implementing Regulation (EU) 2015/207	Internet
13.	Water Framework Directive 2000/60/EC	Internet
14.	European Structural and Investment Funds Management Act	Internet
15.	Law on Planning	Internet
16.	Ordinance No. 4 of 22.07.2016 on determining the procedure for coordinating draft documents under Art. 26, para. 1 of the European Structural and Investment Funds Management Act	Internet
17.	Ordinance No. 4 of May 21, 2001 on the scope and content of investment projects	Internet
18.	Ordinance No. 8 of June 14, 2001 on the volume and content of development plans	Internet
19.	Ordinance on the terms and conditions for compulsory insurance in design and construction	Internet
20.	Public Procurement Act and by-laws on its implementation	Internet
21.	Environmental Protection Act	Internet
22.	OCM No. 189 of 28.07.2016 for determining national rules for the eligibility of costs under the programs co-financed by ESIF for the 2014-2020 program period.	Internet
23.	OCM No. 162 of 05.07.2016 for determining detailed rules for the provision of grants under the programs financed by ESIF for the period 2014-2020.	Internet

24.	OCM No. 160 of 01.07.2016 on determining the rules for consideration and evaluation of offers and the conclusion of contracts in the selection procedure with a public invitation from beneficiaries of grants from the European Structural and Investment Funds	Internet
25.	OCM No. 79/2014 on the establishment of committees to monitor the Partnership Agreement of the Republic of Bulgaria and the programs co-financed by ESIF for the program period 2014-2020.	Internet
26.	OCM No. 290/2022 for the adoption of the Methodology for changing the price of a public procurement contract as a result of inflation.	Internet
27.	Ordinance for determining the conditions, order and mechanism for the functioning of the information system for the management and monitoring of the funds from the European Structural and Investment Funds and for conducting proceedings before the governing bodies through UMIS;	Internet
28.	Joint operational program for cross-border cooperation under the European Neighborhood Instrument "Black Sea Basin 2014-2020"	Internet
Waters		
29.	Maritime Strategy Framework Directive 2008/56/EC	Internet
30.	Water Framework Directive 2000/60/EC	Internet
31.	Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption	Internet
32.	Directive 91/271/EEC on urban waste water treatment	Internet
33.	Directive 2008/105/EC laying down environmental quality standards in the field of water policy	Internet
34.	Directive 2013/51/Euratom to determine requirements for the protection of the health of the population with regard to radioactive substances in water intended for human consumption.	Internet
35.	Directive 91/271/EC on the quality of drinking water:	Internet
36.	Directive 2006/118/EC on the protection of groundwater against pollution	Internet
37.	Directive 2013/51/EURATOM to determine requirements for the protection of the health of the population with regard to radioactive substances in water intended for human consumption	Internet
38.	Blueprint for the protection of Europe's water resources until 2020	Internet
39.	Marine strategy for environmental protection in marine waters in Bulgaria	Internet
40.	National strategy for management and development of the water sector	Internet
41.	Strategy for the development and management of water supply and sewage in the Republic of Bulgaria for the period 2014-2023.	Internet
42.	Reports of Bulgaria to the EC under Art. 15 and Art. 17 of Directive 91/271/EEC	Internet
43.	River Basin Management Plans.	Internet
44.	Waters Act	Internet
45.	Black Sea Coast Organization Act;	Internet
46.	Maritime Spaces, Inland Sea Lanes and Ports of the Republic of Bulgaria Act;	Internet

47.	Ordinance No. RD-02-20-8 of 2013 on the design, construction and operation of sewage systems	Internet
48.	9th Technical assessment of information on the implementation of Council Directive 91-271-EEC; 10th technical assessment on the Urban Waste Water Treatment Directive (UWWTD) implementation 2016; 11th technical assessment on UWWTD implementation	Internet
49.	National Investment Plan for Water Supply and Sanitation (2021)	Internet
Waste		
50.	Directive 2008/98/EC on waste and repealing certain directives (Waste Framework Directive)	Internet
51.	Thematic Waste Strategy	Internet
52.	Waste Management Act	Internet
53.	Resource Efficiency Roadmap (of the EU)	Internet
54.	European Strategy for Plastics in the Circular Economy	Internet
55.	National Waste Management Plan 2014-2020	Internet
56.	National Strategic Plan for a step-by-step reduction in the amount of biodegradable waste destined for landfill	Internet
57.	Directive (EU) 2018/850 amending Directive 1999/31/EC on the landfill of waste	Internet
58.	Directive 2012/19/EU on the management of waste electrical and electronic equipment, as amended by Directive (EU) 2018/849 in relation to the circular economy package	Internet
59.	Directive 2015/720/EU amending Directive 94/62/EC as regards reducing the consumption of thin plastic shopping bags	Internet
60.	Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators, as amended by Directive 2013/56/EU	Internet
61.	Directive 2012/19/EC of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment	Internet
62.	Directive 94/62/EC on packaging and packaging waste, as amended by Directive (EU) 2018/852 in relation to the circular economy package	Internet
Natura 2000 and Biodiversity		
63.	EU Biodiversity Strategy to 2020	Internet
64.	Biological Diversity Act	Internet
65.	Protected Areas Act	Internet
66.	National Priority Action Framework for Natura 2000	Internet
67.	National Information and Communication Strategy for the Natura 2000 Network 2014-2023.	Internet
68.	National Strategy for the Protection of Biological Diversity	Internet
69.	Directive 92/43/EEC on the protection of natural habitats and wild flora and fauna	Internet
70.	Directive 2009/147/EC on the quality of drinking water:	Internet
71.	Convention for the Protection of the Black Sea from Pollution/Protocol for the Protection of Biological and Landscape Diversity in the Black Sea	Internet

72.	Convention on Biological Diversity/Cartagena Protocol on Biosafety	Internet
73.	Convention for the Protection of Wild European Flora and Fauna and Natural Habitats	Internet
74.	Convention for the Conservation of Migratory Species of Wild Animals	Internet
Climate Change, Floods and Landslides		
75.	Directive 2007/60/EC on flood risk evaluation and management	Internet
76.	Directive 2008/114/EC on the identification and designation of European critical infrastructures and the evaluation of the need to improve their protection, repealed by Directive 2022/2557 on the resilience of critical entities	Internet
77.	EU Climate Change Adaptation Strategy, 2013	Internet
78.	Flood risk management plans	Internet
79.	Third National Action Plan on Climate Change for the period 2013-2020.	Internet
80.	Disaster Risk Reduction Strategy 2014-2020 and 2018-2030	Internet
81.	National Disaster Protection Program 2014-2018	Internet
82.	National Climate Change Adaptation Strategy and Action Plan, May 2018 proposal.	Internet
83.	The National Program for the Prevention and Limitation of Landslides on the Territory of the Republic of Bulgaria, Erosion and Abrasion along the Danube and Black Sea coasts 2015-2020.	Internet
84.	The national spatial development concept for the period 2013-2025 (updated in 2019)	Internet
85.	Disaster Protection Act	Internet
Ambient Air Quality		
86.	Annual bulletins on ambient air quality, EA "Environment"	Internet
87.	Directive 2008/50/EC on ambient air quality and cleaner air for Europe	Internet
88.	Directive (EU) 2016/2284 on the reduction of national emissions of certain atmospheric pollutants;	Internet
89.	Directive 2009/125/EC establishing a framework for setting ecodesign requirements for energy-related products	Internet
90.	Directives 2008/850/EU and 2004/107/EC on the mutual exchange of information and reporting on AAQ	Internet
91.	Directive 2007/2/EC on the creation of spatial information in the EC (INSPIRE)	Internet
Documents and Data related to OPE		
92.	OPE 2014-2020	Internet
93.	Program changes and justifications	OPE MA
94.	OPE 2014-2020 Evaluation Plan approved by the OPE 2014-2020 Monitoring Committee;	Internet
95.	Report on the preliminary (ex-ante) evaluation of the OPE 2014-2020.	Internet
96.	Preliminary evaluation of financial instruments	Internet

97.	Updated report on the preliminary evaluation of implementation of financial instruments	OPE MA
98.	Agreements between the MOEW and the Fund of Funds	MA OPE - if necessary
99.	Investment strategies for financial instruments under PA1 and PA2	OPE MA
100.	Program Environmental Assessment Report and Environmental Assessment Opinion No. 15-9/2014.	Internet
101.	Internal Rules and Procedures of the Managing Authority (MA) of the OPE 2014-2020.	Internet/MA OPE
102.	Manuals, rules, procedures and instructions to beneficiaries	Internet
103.	Annual reports on the implementation of OPE 2014-2020	Internet/MA OPE
104.	Indicative annual work programs (IAWPs)	Internet
105.	Justifications for the IAWP	OPE MA
106.	Minutes and materials of the meetings of the Monitoring Committee (MC) of the OPE 2014-2020.	Internet
107.	Financial data for the implementation of the OPE according to procedures	UMIS 2020/MA OPE
108.	Beneficiary contacts	OPE MA
109.	Application Guidelines/Direct Provision Guidelines	Internet
110.	Reasons for termination of proceedings	OPE MA
111.	Analyzes used in program programming such as: Analysis of the current situation in the "environment" and "climate change" sectors for the period 2007-2012.	OPE MA
112.	Guidelines for the integration of environmental policy and climate change policy in the CP, CAP and CFP funds for the period 2014-2020.	Internet
113.	Data from announced procedures, submitted project proposals and concluded contracts	UMIS 2020/MA OPE
114.	Beneficiary reports	OPE MA
115.	Data on the achieved values of the indicators	OPE MA
116.	National Communication Strategy	Internet
117.	Annual plans for the implementation of the national communication strategy	Internet
118.	Data on conducted trainings, satisfaction analyzes and analysis of training needs, both for MA and beneficiaries	OPE MA
119.	Data on the activities performed and the results achieved in terms of information and communication	OPE MA
120.	Audit reports	OPE MA
121.	Audit reports of the Audit Chamber	Internet
Other Data and Documents		
122.	Analyzes and River Basin Management Plans and Flood Risk Management Plans	Internet
123.	Data from reports on the state of the environment	Internet

124.	Biodiversity and NATURA 2000 data and analysis	Internet/MOEW
125.	Statistical data	NSI and Eurostat
126.	Monitoring and evaluation guidelines for the 2014-2020 program period of the EC from March, 2014.	Internet
127.	EC Guidance on Assessment Plans from February 2015.	Internet
128.	Commission working paper on the summary of the results of ESIF 2014 assessments and plans, issued in 2016.	Internet
129.	EC guidance on the review of performance frameworks and the allocation of the performance reserve, 2018.	Internet
130.	Reports on the implementation of the budget according to policies and budget programs of the MOEW	Internet
131.	Reports on the activity of the EMEPA	Internet
132.	Bulgaria 2022 Report Accompanying the Council Recommendation on Bulgaria's National Reform Program 2022 and containing the Council's Opinion on Bulgaria's Convergence Programme 2022, European Commission	Internet
133.	National report on the state of the environment in Bulgaria, 2023, EEA	Internet

Annex 2. Changes in OPE 2014-2020

Description of changes

MC of OPE (08.10.2015)

The financial plan of OPE 2014-2020 has been changed (Table 17) by redistributing program funds from 2015 and 2016 to 2017, 2018 and 2019 in view of the late start of the program.

Changes have been adopted in the schedule for the implementation of major projects (Table 27) regarding the deadline for submitting the project proposal *"Design and construction of a plant for combined energy production in Sofia with the utilization of RDF - the third phase of an integrated system of facilities for the treatment of the household waste of the Sofia Municipality"* , which was changed in the fourth quarter of 2016.

MC of OPE (26.06.2016)

The financial plan of OPE 2014-2020 (Table 17) has been changed: the resource for 2016 was additionally reduced, from which EUR 8,333,340 (16,298,596 BGN) were redistributed for 2017, 2018 and 2019, respectively.

A change in the schedule for the implementation of major projects for OPE 2014 - 2020 was adopted (Table 27): The deadline for submitting the project proposal *"Design and construction of an installation for combined energy production in Sofia with the utilization of RDF - third phase of an integrated system of facilities for the treatment of household waste of the Municipality of Sofia"* has been changed to the first quarter of 2017, with the planned completion date of the project being the fourth quarter of 2021.

The list of major projects includes *the Integrated Water Cycle Project of the city of Vratsa*.

MC of OPE (08.06.2017)

The planned date for notification/submission of the project proposal for the second phase of the *"Integrated water cycle project of the city of Vratsa"* to the EC has been changed from the third quarter of 2016 to the second quarter of 2017, with the planned start of the project implementation being modified Q4 2016

The planned date for notification/submission of the project proposal for the project *"Design and construction of an installation for combined energy production in Sofia with the utilization of RDF - third phase of an integrated system of facilities for the treatment of household waste of the Sofia Municipality"* to the EC has been amended from the first quarter of 2017 to the second quarter of 2018, with the projected completion date of the project being pushed back to fourth quarter of 2023.

MC of OPE (17.05.2018)

The following changes have been made to the PA5 indicators (Table 3): The result indicator "Amount of NOx" is omitted; A base value of the result indicator "Quantity of FPM10" of 7,347.71 t/year is set; The base year for the result indicator has been changed to 2011; The target value of the result indicator "Quantity of FPM10" has been changed to 7,017.71 t/year. The scope of permissible activities under PA5 has been specified. The total amount of certified expenses was reduced to EUR 743,151 (1,453,454 BGN).

Changes have been made to the list of major projects (Table 27): The planned completion date of the *"City of Vratsa Integrated Water Cycle Project - Phase II"* project has been changed from the fourth quarter of 2018 to the fourth quarter of 2021.

A change was made in table 18a in order to take into account the way of ensuring the national co-financing.

MC of OPE (28.05.2019)

Funds have been redistributed as follows: Funds under Thematic Objective (TO) 06 have been increased, while under TO5 they have been reduced; The share of funds for PA2 has been increased /and, accordingly for PO 3 has been reduced/, due to the transfer of the performance reserve from PA3 to PA2 (EUR 5,797,318 ESIF). The budget of PA5 has been increased by the amount of the reserve for the implementation of PA4 (EUR 4,004,944 EU part).

The resource in the form of FI under PA1 has been increased from 10% to 11.4%. The resource in the form of FI under PA2 has been reduced from 10% to 9.32% of the PA2 budget.

Funding measures in PA2 have been supplemented.

According to PA3, a resource was redirected under CLLD (EUR 10,684,768.62 EU part).

The list of major projects is supplemented by two more: for the construction of water infrastructure with the beneficiaries WSS Burgas and Sofia Municipality.

MC of OPE (11.05.2020)

The budget of PA3 was reduced, and funds were transferred to OPIC in the amount of BGN 49,453,000. (non-contractual resource and savings). Part of the expected savings from PO 1 to PO 5 has been transferred.

Updated PA1 indicators as follows: the base and target value of result indicator 1.1. "Load of pollution, which is collected and treated in full accordance with the applicable legislation" from 196,271 PE to 0 PE. /base value/, and the target value – from 1,669,655 PE to 1,900,000 PE The target values (by 2023) of performance indicators have been changed as follows: SO18 "Additional number of residents with access to improved water supply" - from 220,000 to 1,800,000 persons; of SO19 "Additional number of residents with access to improved wastewater treatment" - from 1,473,384 PE to 1,900,000 PE; 1.4. "Built/rehabilitated/reconstructed WWTPs" - from 16 units to 25 units.

Changes have been made to PA2 indicators: the result indicator: 2.1 "Amount of landfilled municipal waste" is renamed "Reduced amount of landfilled municipal waste". The baseline and target value of the indicator were changed from 2,323,00 tons/year to 0 tons/year and from 2,038,000 to 650,000 tons/year, respectively. Added a new result indicator 2.4. "Completed technical reclamation of landfills, subject to a procedure for violation of EU law in connection with the decision of the Court of the European Union of 16.07.2015 in case C-145/14". Indicator SO17 "Additional waste recycling capacity" has an updated target value (by 2023) - from 105,000 tons to 240,000 tons.

Under PA4, the target value of result indicator 4.2 "Population at risk of landslides" was updated from 460,000 persons to 300,000 persons.

According to PA5 changes were made in the target values of the result indicator 5.1 "Quantity of FPM10" - from 7,017.71 t/y to 7,001.15 t/y; as well as the performance indicators as follows: 5.3 "Population covered by the measures to reduce the quantities of FPM10 and NOx" - from 1,300,000 persons is changed to 3,000,000 persons; and 5.4 "Projects aimed at reducing the quantities of FPM10 and NOx" - from 5 items to 19 items.

According to PA6, the target value (by 2023) of indicator 6.1 "Average time for approving a project proposal" of 147 days is changed to 90 days.

MC of OPE (18.05.2022)

Texts for parts PA3 and PA4 have been added to Section 1; additions are included in the part "OP "Environment 2014-2020" and strategic documents at the EU level", referring to the EU Biodiversity Strategy for 2030. Changes are reflected in item 1.2. Justification of the allocation of financial resources, reflecting changes in the percentage ratio of financial resources (support from the Union) by thematic objectives and investment priorities, resulting from the transfer of funds along the relevant priority axes.

The changes in Section 2 "Priority axes" are as follows: According to PA1, the value of the financial indicator "Total amount of certified costs by the Certification Authority" was reduced due to the transfer of EUR 37,324,307 (funds from the EU and the state budget) to PO 4 (EUR 20,962,967) and PO 5 (EUR 16,361,340). According to PA2, due to the lack of projects that can be supported by financial instruments and the corresponding termination of the mandate of the FI Management Fund under the program for the "Waste" sector, amendments were made to the texts in the relevant section. The value of the financial indicator "Total amount of certified costs by the Certifying Authority" was reduced due to the transfer of EUR 23,519,427 (funds from the EU and the state budget) to PO 3.

At PA3 (Specific objective 1 "Improving the conservation status of species and habitats from the Natura 2000 network") more afforestation measures are planned with a contribution to the objectives of the EU Biodiversity Strategy 2030.

Indicator 3.7 "Area of the territory of the Natura 2000 network with an established management structure" is excluded from the text of the program. The value of the financial indicator "Total amount of certified costs by the Certification Authority" has been increased due to the transfer of EUR 23,519,427 from PA2.

Additions were made with new financing measures and specific beneficiaries under PA4. The value of the financial indicator "Total amount of certified costs by the Certification Authority" has increased due to the transfer of EUR 20,962,967 (funds from the EU and the state budget) from PO 1 to cover the costs of the additional procedures provided for in PO 4.

The value of the financial indicator "Total amount of certified costs by the Certifying Authority" (PA5) has been increased due to the transfer of EUR 16,361,340 (funds from the EU and the state budget) from PO 1.

In connection with the redistribution of funds between the individual priority axes, the financial plan (Section 3) has been updated in order to bring it in line with the changes in the financial parameters of the 5 priority axes.

MC of OPE (28.07.2022)

A new PA7 "Support for refugees from Ukraine in Bulgaria" was created under thematic objective 9 "Promoting social inclusion, combating poverty and any form of discrimination". In this regard, the share of the thematic objectives in the OPE 2014-2020 has been changed, due to the transfer of BGN 26,000,000 from thematic objective 6 "Preservation and protection of the environment and promotion of resource efficiency" (PA2) to the new PA7. The financial plan of OPE 2014-2020 has been updated.

MC of OPE (02.12.2022)

Due to changes in economic and labor market conditions, the reallocation of funds made in 2020-2021 and the planned completion of six water and sanitation projects in the next program period, the indicators have been changed as follows:

According to PO 1 (projects for the construction of WSS infrastructure of consolidated WSS operators Plovdiv, Stara Zagora, Sliven, Sofia and Varna; major WSS project Burgas) the target values of the following indicators have been reduced: SO18 "Additional number of inhabitants with access to improved water supply" – from 1,800,000 to 1,400,000 persons; SO19 "Additional number of inhabitants with access to improved wastewater treatment" - from 1,900,000 PE. to 1,180,000 PE; and

result indicator 1.1 "Pollution load that is collected and treated in full compliance with the applicable legislation" - from 1,900,000 PE to 1,180,000 PE.

Indicator 3.5 "Inventoried protected areas, including the Black Sea water area within its borders" is deleted under PO 3 (project BG16M1OP002-3.005-0001-C02 "Natura 2000 in the Black Sea").

MC of OPE (23.05.2023)

Under PA1, a new procedure has been approved through direct provision "Construction of Water and Sewerage Infrastructure-2" with a beneficiary EMEPA and territorial scope: municipalities for which investment needs have been established to achieve compliance with the requirements of the Council Directive of May 21, 1991 on the treatment of urban wastewater (91/271/EEC), for agglomerations with over 2,000 PE with a total value of up to BGN 97.7 million. Under PA2, the approved procedure is "Reclamation of landfills for closure, subject of a procedure for violation of EU law in case C-145/14 - second" with a total value of BGN 62 million.

Other changes to the program include updating the information on the major project of the Sofia Municipality under PA2, which is being terminated, and reducing the target value of the result indicator from 650,000 tons to 540,000 tons; removal of the indicator "Additional capacity for the recovery of household waste (to obtain energy)".

Annex 3. Supported investments under OPE 2014-2020

Table 30. Procedures under PA1 "Waters" and implementation status as of June 30, 2023.

Procedure	Contracts/ Orders (number)	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
1.001 Supporting the regional investment planning of the water and sanitation sector	1	Completed	MRDPW	42,852,837.28	42,971,010.68
1.002 Preparation of environmental assessments for the purposes of adopting the River Basin Management Plans for the period 2016 - 2021, and the Marine Strategy and the Program of Measures.	1	Completed	Directorate "Water Management" in the MOEW	341,532.48	341,532.48
1.003 Support efficiency, management and institutional capacity in connection with the implementation of the reform in the water and sanitation sector	1	Completed	MRDPW	12,226,311.93	12,226,311.93
1.004 Development and introduction of methods for the analysis of water, sediments and biota and retrofitting of laboratories of the Executive Environmental Agency	1	Completed	EEA	4,411,215.82	4,411,215.82
1.005 Second phase of projects for the construction of water and sanitation infrastructure, the implementation of which has started under the 2007-2013 OPE.	8	5 completed (Bansko; Varna; Radnevo; Tervel; Yambol), 3 in progress	Municipalities of Bansko, Vidin, Vratsa, Varna, Radnevo, Tervel, Shumen, Yambol	190,732,077.12	156,656,373.68
1.006 Implementation of early WSS projects	4	2 completed (Asenovgrad and Pleven), two in progress	Municipalities of Asenovgrad, Dobrich, Dolna Mitropolia and Pleven, Plovdiv	311,516,007.89	278,826,384.64
1.007 Preparation of a regional feasibility study for water supply and sewerage for the territory of the Sofia Municipality	1	Completed	Sofia Municipality	3,377,117.35	3,377,117.35

Procedure	Contracts/ Orders (number)	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
1.008 Completion and/or optimization of networks for control and operational monitoring of the chemical state of groundwater	0		EEA	Terminated due to lack of submitted project proposal	
1.009 Implementation of early water and sanitation projects - component 2	5	Finished	Aytos, Chirpan, Elhovo, Primorsko, Tutrakan municipalities	69,521,040.53	69,521,040.53
1.010 Completion of water quantity monitoring systems	0		Directorate "Water Management" MOEW	Terminated due to lack of submitted project proposal	
1.011 Improving the monitoring of drinking water quality	1	In execution	Ministry of Health	10,000,000.00	8,415,266.17
1.012 Completion and/or optimization of networks for control and operational monitoring of the chemical state of groundwater	0		EEA	Terminated due to lack of submitted project proposal	
1.013 Completion of water quantity monitoring networks	1	In execution	MOEW	5,118,180.97	956,384.82
1.014 Regional investment WSS project for the designated territory of "WSS" EOOD Smolyan	1	In execution	WSS EAD, city of Smolyan	73,872,571.6	27,127,217.84
1.015 Provision of funding under priority axis 1 "Waters" of OPE 2014-2020, for financial instruments	1	In execution	FMFIB	266,736,721.79	66,684,180.45
1.016 Construction of WSS infrastructure	13	In execution	WSS Burgas; WSS Varna; WWSS Vidin; WSS Vratsa; WSS Dobrich; WSS Kardzhali; WSS Pernik; WSS Plovdiv; WSS Ruse; Silistra WSS; WSS Sliven; WSS Stara Zagora; WSS Shumen; WSS Yambol	996,339,366.74	309,498,760.94
1.017 Preparation and development of the third cycle of River Basin Management Plans for the period 2022-2027.	1	In execution	MOEW	24,000,000.00	12,882,172.23

Procedure	Contracts/ Orders (number)	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
1.018 Supporting the regional investment planning of the water and sanitation sector - stage 2	1	In execution	MRDPW	22,844,980.80	11,892,710.93
1.019 Completion and equipment of networks for control and operational monitoring of the chemical state of groundwater	1	Completed	EEA	13,428,748.81	0
1.020 Construction of WSS infrastructure in the Sofia Municipality	1	In execution	Sofia Municipality	86,864,114.02	14,702,150.84

Source: UMIS 2020 public module

Table 31. Procedures under PA2 "Waste" and implementation status as of June 30, 2023.

Procedure	Contracts/ Orders (number)	Status	Beneficiary	Agreed funds (GA), BGN.	Verified expenses, BGN.
2.001 Design and construction of composting installations for separately collected green and/or biodegradable waste, including providing the necessary equipment and facilities and equipment for separate collection of green and biodegradable waste	0		All municipalities in the country	Terminated because none of the submitted 18 project proposals met the requirements	
2.002 Combined procedure for the design and construction of composting installations and installations for the preliminary treatment of household waste	16	5 completed (Pazardzhik, Madan, Petrich, Sandanski and Troyan), 11 are in progress	26 RWMA (118 municipalities) Contracts with municipalities: Pazardzhik, Blagoevgrad, Botevgrad, Velingrad, Gorna Malina, Gotse Delchev, Dospat, Dupnitsa, Kostinbrod, Madan, Oryahovo, Petrich, Razgrad, Sandanski, Troyan	129,800,727.38	83,301,115.19
2.003 Provision of funding under priority axis 2 "Waste" of OPE 2014-2020, for financial instruments	1	Terminated	FMFIB	606,554.42	606,554.42

Procedure	Contracts/ Orders	Status	Beneficiary	Agreed funds (GA), BGN.	Verified expenses, BGN.
	(number)				
2.004 Design and construction of anaerobic installations for separately collected biodegradable waste	3	In execution	3 RWMA (19 municipalities) Contracts with municipalities: Blagoevgrad, Burgas, Ruse	90,308,479.72	34,126,899.4
2.005 Design and construction of composting installations for separately collected green and/or biodegradable waste	15	11 completed projects (Valchedrum, Maritsa, Montana, Plovdiv, Svilengrad, Harmanli), 4 are in progress	39 municipalities from 7 RWMA Municipalities: Berkovitsa, Vratsa, Valchedrum, Karlovo, Lom, Maritsa, Montana, Plovdiv, Svilengrad, Harmanli, Chiprovtsi, Hisarya	46,146,109.75	41,447,960.13
2.006 Second combined procedure for the design and construction of composting installations and installations for the preliminary treatment of household waste	3	One completed (Zlatitsa); one in progress (Asenovgrad) and one terminated (Elhovo)	4 RWMA (22 municipalities)	15 58 3741.47	6,140,937.38
2.007 Completion of the project "Implementation of a decentralized model for bio-waste management in one of the waste management regions in Bulgaria, including construction of the necessary technical infrastructure - a system for separate collection and a facility for recycling the collected bio-waste".	1	Completed	RWMA Sevlievo (municipalities of Sevlievo, Dryanovo and Suhindol)	1,683,576.27	1,683,576.27
2.008 Design and construction of an installation for combined energy production in Sofia with the utilization of RDF - third phase of an integrated system of municipal waste treatment facilities of the Sofia Municipality	1	Terminated	Sofia Municipality with partner Toplofikatsia Sofia EAD	177,629,778.24	0
2.009 Implementation of demonstration projects in the field of waste management	63	21 completed; 3 discontinued; 39 in execution	Municipalities, non-profit and profit legal entities	19,195,200.70	11,591,956.99

Procedure	Contracts/ Orders	Status	Beneficiary	Agreed funds (GA), BGN.	Verified expenses, BGN.
	(number)				
2.010 Reclamation of landfills for closure subject to EU infringement proceedings in case C-145/14	54	47 completed, 7 in progress	Municipalities with landfills subject to a procedure for violation of EU law in case C-145/1497	115,032,726.06	97,536,629.38

Source: UMIS 2020 public module

Table 32. Procedures under PA3 "Natura 2000 and Biodiversity" and implementation status as of June 30, 2023.

Procedure	Contracts/ Orders	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
	(number)				
3.001 Development of a management approach for the Natura 2000 network and for management of the NPFA	1	Completed	Directorate "National Nature Protection Service", MOEW	810,363.49	810,363.49
3.002 Designation and completion of the network of marine protected areas	0		Directorate "National Nature Protection Service", MOEW	Aborted procedure	
3.003 Analyzes and studies of species and natural habitats subject to reporting under Art. 17 of the Habitats Directive and Art. 12 of the Birds Directive	1	Completed	EEA	14,111,740.83	14,111,740.83
3.004 Raising stakeholder awareness of the Natura 2000 network	0		Directorate "National Nature Protection Service", MOEW	Aborted procedure	
3.005 Designation and completion of the network of marine protected areas	1	In execution ⁹⁸	Directorate "National Nature Protection Service", MOEW	11,734,980.00	4,060,306.73
3.006 Raising stakeholder awareness of the Natura 2000 network	1	In execution	Directorate "National Nature Protection Service", MOEW	4,300,000.00	2,824,811.71
3.007 Improvement of the nature conservation status of species and types of natural habitats on the	14	7 completed (DNP "Vitosha");	RIEW-Ruse; DNP "Rila" DNP "Golden Sands"; RIEW-Haskovo; RIEW-Montana;	33,935,220.45	27,689,443.3

⁹⁷With the exception of those that are subject to financing by the Enterprise for the Management of Environmental Protection Activities

⁹⁸The project will not be able to be implemented due to the impossibility of carrying out research in the Black Sea water area due to the military actions in Ukraine.

Procedure	Contracts/ Orders	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
	(number)				
territory of the Natura 2000 network falling into national parks, natural parks and maintained reserves		DNP "Rila Monastery"; RIEW-Varna, Plovdiv, Haskovo, Ruse and Sofia); 7 in execution	DNP "Central Balkan"; DNP "Pirin"; RIEW-Sofia; DNP "Vrachanski Balkan"; RIEW-Stara Zagora; RIEW-Varna; RIEW-Plovdiv; DNP "Rila Monastery"; RIEW-Burgas; DNP "Vitosha"; DNP "Balgarka"; DNP "Sinite Kamani"		
3.008 LAG Pomorie: Measure 6 "Improving the nature protection status of species in the Natura 2000 network through the CLLD approach in the territory of the Pomorie LAG"	1	In execution	Non-profit legal entities; Municipalities with headquarters and address of management on the territory of Pomorie LAG - Pomorie Municipality.	1,119,867.17	684,738.28
3.009 LAG Tutrakan-Slivo pole, Measure 109 OPE "Improving the nature protection status of species from the Natura 2000 network through the CLLD approach"	0		Non-profit legal entities, Tutrakan and Slivo pole Municipalities	Terminated due to late project proposals	
.010 Improvement of the nature conservation status of species in the Natura 2000 network by means of the CLLD approach in the territory of the Svilengrad Areal LAG	0		Non-profit legal entities; Municipalities with headquarters and address of management on the territory of the Svilengrad LAG - Svilengrad Municipality	One project proposal was submitted, which was rejected at the administrative compliance and eligibility stage	
3.011 Association "LAG Hisarya", Measure 9 of the CLLD - "Improving the nature protection status of species in the Natura 2000 network through the approach of the CLLD in the territory of the LAG Hisarya"	1	In execution	Non-profit legal entities; Municipalities from the territory of the "Hisarya" LAG.	GA terminated on 15.06.2023.	
3.012 Improvement of the nature protection status of species in the Natura 2000 network through the CLLD approach in the territory of the Stambolovo - Kardzhali 54 LAG	1	In execution	Non-profit legal entities; Municipalities from the territory of the Stambolovo - Kardzhali 54 LAG	125,072.1	125,072.1
3.013 - LAG Belene-Nikopol, Improvement of the nature protection status of species from the Natura 2000 network through the approach CLLD in the LAG Belene-Nikopol	0		Non-profit legal entities; Municipalities from the territory of Belene-Nikopol LAG.	Aborted procedure. The evaluation commission's report was not approved by the OPE MA.	

Procedure	Contracts/ Orders	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
	(number)				
3.014 - LAG "Dryanovo - Tryavna - in the heart of the Balkans", Measure 109 OPE "Improving the nature protection status of species from the Natura 2000 network through the CLLD approach"	0		Non-profit legal entities; Municipalities from the territory of the "Dryanovo-Tryavna" LAG.	Terminated due to late project proposals	
3.015 Implementation of priority measures in wetlands	5	In execution	RIEW Burgas; DNP "Persina"; RIEW Ruse; RIEW Varna	21,433,802.20	125,072.10
3.016 Measures for Improving the Conservation State of Birds	4	In execution	NAHA - UHAB; National Association of Hunters and Anglers Union of Hunters and Anglers Saedinenie 1906; Union for the Protection of Nature	4,015,569.58	2,345,476.97
3.017 LAG SAMOKOV Improvement of the nature protection status of species from the Natura 2000 network through the CLLD approach on the territory of LAG Samokov	1	In execution	Samokov municipality	1,120,646.00	0
3.018 "Improving the nature conservation status of species in the Natura 2000 network through the CLLD approach in the territory of the Tundzha LAG"	1	In execution	Foundation "Ecology, Communications and Society"	1,040,147.60	639,102.22
3.019 Shared Vision for the Ecological Network Natura 2000 in Bulgaria	15	14 completed , 1 in progress	Non-profit organizations and associations; Directorate NP; Municipality of Madzharovo and Municipality of Chuprene	874,952.28	874,952.28
3.020 Preparation/updating of plans for species	22	7 completed; 15 in execution	Non-profit organizations	5,229,239.05	4,147,843.9
3.021 Improving the Conservation Status of Natural Habitats	5	1 completed; 4 in execution	Non-profit organizations: Bulgarian Association for Cave and Eco Tourism; Bulgarian Ecological Society; Forest Institute, BAS; Non-profit association "Say Eco"	8,499,041.94	4,091,774.47

Procedure	Contracts/ Orders	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
	(number)				
3.022 Improvement of the nature conservation status of steppe natural habitats through the purchase of lands	1	In execution	RIEW-Varna	13,430,000.00	0
3.023 - LAG "Dryanovo - Tryavna - in the heart of the Balkans", Measure 109 OPE "Improving the nature protection status of species from the Natura 2000 network through the CLLD approach"	0		Non-profit legal entities; Municipalities from the territory of the "Dryanovo-Tryavna" LAG.	Terminated	
3.027 Measures for Improving the Conservation State of Birds - 2	6	In execution	Bulgarian Society for the Protection of Birds (BSPB); Bulgarian Environmental Society; Municipality of Shabla; Good Alternatives Association	4,308,144.96	1,817,834.69
3.028 LAG Svilengrad Areal, Improvement of the nature protection status of species in the Natura 2000 network through the CLLD approach in the territory of LAG Svilengrad Areal-2"	1	In execution	Natural Science Association	4,572,665.75	3,532,973.05
3.029 LAG Tutrakan-Slivo pole, Measure 109 OPE "Improving the nature protection status of species from the Natura 2000 network through the CLLD approach"	1	In execution	Tutrakan Municipality	323,762.31	48,291.47
3.030 LAG Belene-Nikopol Improvement of the nature protection status of species from the Natura 2000 network through the CLLD approach on the territory of LAG Belene-Nikopol"	3	In execution	Natural Science Association; Municipality of Nikopol; Environment and Agriculture Foundation	1,949,812.00	482,703.41
3.031 Shared Vision for the Ecological Network Natura 2000 in Bulgaria - 2	9	5 completed and 4 discontinued	Directorate of NP "Sinite Kamani" Sliven; National Center for Combating Disasters and Accidents - Foundation, Troyan Branch and Byala Branch; Municipality of Kirkovo, Municipality of Lucky; Montana Municipality; Municipality of Sliven; Municipality of Sarnitsa;	346,916.13	346,916.13

Procedure	Contracts/ Orders	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
	(number)				
3.032 - LAG "Dryanovo - Tryavna - in the heart of the Balkans", Measure 109 OPE "Improving the nature protection status of species from the Natura 2000 network through the CLLD approach"	1	In execution	National Center for Combating Disasters and Accidents - Foundation	445,900.18	35,929.71
3.033 Improving the Conservation Status of Natural Habitats - 2"	1	In execution	Foundation "For the Rights of Animals in Bulgaria"	1,815,658.50	0
3.034 Association "LAG Hisarya", Measure 9 of the CLLD - "Improving the nature protection status of species in the Natura 2000 network through the approach of the CLLD in the territory of the LAG Hisarya"	0		Non-profit legal entities; Municipalities from the territory of the "Hisarya" LAG.	0.00	0
3.035 Improving the conservation status of forest natural habitats and supporting the ecosystem services provided by forests through the application of silvicultural practices and afforestation	3	In execution	Southwest State Enterprise DP; Southeast State Enterprise; South Central State Enterprise DP	60,128,909.23	3,415,040.57

Source: UMIS 2020 public module

Table 33. Procedures under PA4 "Flood and Landslide Risk Prevention and Management" and implementation status as of June 30, 2023.

Procedure	Contracts/ Orders	Status	Beneficiary	Agreed funds (GA) , BGN	Verified expenses, BGN.
	(number)				
4.001. Establishment of six centers to increase the preparedness of the population for an adequate response to floods and subsequent crises	1	In execution	Directorate General "Fire Safety and Protection of the Population" - Ministry of the Interior	37,687,802.49	35,683,745.32
4.002. Pilot project to create a National Real-Time Water Management System (NRTWMS) - river Iskar	1	In execution	Directorate "Water Management", MOEW	6,964,000.00	0

Procedure	Contracts/ Orders (number)	Status	Beneficiary	Agreed funds (GA) , BGN	Verified expenses, BGN.
4.003. Prevention and counteraction of landslide processes to limit their risk (including along the republican road network)	10	6 completed (RIA, MRDPW, Lukovit, Oryahovo (2) and Sliven municipalities); 4 in execution	RIA, MRDPW, Lom Municipality, Oryahovo Municipality (2 projects); Municipality of Lukovit, Municipality of Sliven; Municipality of Cherven Bryag	49,999,460.46	36,706,461.60
4.004. Measures to introduce solutions for flood risk prevention and management	3	3 completed	Municipality of Gabrovo, Municipality of Galabovo, Municipality of Svilengrad	2,044,237.19	2,044,237.19
4.005. Implementation of studies and evaluations in connection with the second FRMP for the period 2022-2027.	1	In execution	Directorate "Water Management", MOEW	13,190,867.55	8,782,774.10
4.006. Integration, upgrade and optimization of processes for prevention, preparedness and response to natural risks	1	In execution	Directorate General "Fire Safety and Protection of the Population" - Ministry of the Interior (DGFSP - Mol)	19,997,915.99	10,941,166.42
4.009. Expansion of the system of early warning and notification of the population at the LAU level and modernization of the EWRS of the executive authorities	1	In execution	Directorate "Communication and Information Systems" - Ministry of the Interior	48,485,086.98	0

Source: UMIS 2020 public module;

Table 34. Procedures under PA5 "Improving ambient air quality" and implementation status as of June 30, 2023.

Procedure	Contracts/ Orders (number)	Status	Beneficiary	Agreed funds (GA) , BGN.	Verified expenses, BGN.
5.001 Establishment of an information system for reporting ambient air quality data as part of the National Real-time Air Quality Monitoring System	1	Completed	EEA	606,723.10	606,723.10

5.002 Development/Update of municipal atmospheric air quality programs	17	17 completed	28 municipalities	2,493,349.52	2,493,349.52
5.003 Measures to improve atmospheric air quality	8	In execution	8 municipalities (Burgas, Vidin, Gorna Oryahovitsa, Dimitrovgrad, Montana, Plovdiv, Smolyan, Sofia municipality)	129,777,977.38	37,533,996.64
5.004 Measures to address transportation as a source of air pollution	12 ¹	2 completed (Burgas and Haskovo) 10 in progress	11 municipalities in partnership with municipal public transport companies	494,174,073.22	89,128,841.09
5.005 Development/Update of municipal programs for ambient air quality - 2	4	4 completed	4 municipalities (Burgas, Vidin, Kardzhali, Ruse)	245,082.16	245,082.16

Source: UMIS 2020 public module; 1. Contracts of municipalities: Burgas, Varna, Vratsa, Ruse, Plevn, Pernik, Sliven, Stara Zagora, Haskovo and 3 contracts of the Sofia Municipality

Table 35. Procedures under PA6 "Technical assistance" of OPE and implementation status as of June 30, 2023.

Procedure	Contracts (number)	Beneficiary	Agreed Funds		Amounts Actually Paid	
			BGN	BGN	BGN	%*
Technical assistance for the OPE 2014-2020 MA.	6	OPE MA	16,413,350.31	16,413,350.31	100.00	
Technical assistance for management and implementation of OPE 2014-2020.	20	OPE MA	69,119,651.79	61,254,813.42	88.62	

Source: UMIS 2020 public module; *to those agreed

Table 36. Procedures under PA7 "Support for refugees from Ukraine in Bulgaria" and implementation status as of June 30, 2023.

Procedure	Contracts/Orders	Status	Beneficiary	Agreed Funds (GA), BGN.	Verified expenses, BGN.
	(number)				

Support to meet the basic needs of refugees from Ukraine through a measure implemented by the Ministry of Tourism (CARE)	1	In execution	Ministry of Tourism	30,588,236.53	29,155,080.00
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Annex 4. Indicators

Priority axis 1 "Waters"

Table 37. Achieving the objectives of the outcome indicators under PA1 by June 2023.

Indicator	Base value	Target value	Achieved 2023	
			Value	(%)
1.1 Load of pollution, which is collected and treated in full accordance with the applicable legislation (PE)	0	1,180,000	396,199	34%
1.2. Water bodies with improved quantitative status monitoring (number)	90	140	90	0%
1.3. Water bodies with improved chemical status monitoring (number)	153	173	173	100%

Source: according to Data of the OPE 2014-2020 MA

Table 38. Achieving the objectives of the performance indicators under PA1 by June 2023.

Indicator	Target value	Achieved 2023		Expected under contracts
		Value	(%)	
CO18 Water supply: Additional number of residents with access to improved water supply (number)	1,400,000	232,157	17%	2,142,957
CO19 Wastewater Treatment: Additional number of residents with access to improved wastewater treatment (PE)	1,180,000	793,970	67%	2,250,329
1.4. - Built/Rehabilitated/Reconstructed WWTPs – 3	25	16	64%	29
1.5. New/Updated analytical/program/strategic documents (number)	18	15	83%	24

Source: according to Data of the OPE 2014-2020 MA

Table 39. Changes in PA1 indicators

Type of Indicator	Indicator	Initial Target Value	Target Value at Time of Assessment
Execution	SO18 Water supply: Additional number of residents with access to improved water supply (number)	220,000 1,800,000*	1,400,000
Execution	SO19 Wastewater Treatment: Additional number of residents with access to improved wastewater treatment (PE)	1,473,384 1,900,000	1,180,000
Execution	1.4. - Built/Rehabilitated/Reconstructed WWTPs – 3	16	25
Result	1.1 Load of pollution, which is collected and treated in full accordance with the applicable legislation (PE)	1,669,655 (at base value 196,271) 1,900,000 (at base value 0*)	1,180,000 (at base value 0)

Source: according to Data of the MA OPE 2014-2020; *Interim change from 2020

Priority axis 2 "Waste"

Table 40. Achieving the objectives of the PA2 outcome indicators by June 2023.

Indicator	Base value	Target value	Achieved 2023	
			Value	(%)

2.1. Reduced amount of landfilled household waste (tons/year)	0	540,000*	307,488.26	58%
2.4. Completed technical reclamation of landfills, subject to a procedure for violation of EU law in connection with the decision of the Court of the European Union of 16.072015 in case C-145/14	0	57	52	91%

Source: according to OPE 2014-2020 MA Data: * change proposed and approved by the MC in May 2020. Amendment of the OPE 2014-2020, approved by EC Implementation Decision No. C(2020) 4105 of June 16, 2020.

Table 41. Achieving the objectives of the PA2 performance indicators by June 2023.

Indicator	Target value	Achieved 2023		Expected under contracts
		Value	(%)	
SO17 Solid waste: Additional waste recycling capacity (tons/year)	240,000	98,636	41%	226,694.94
Additional capacity for the recovery of household waste (to obtain energy) (ton/year)	180,000	0	0%	0*

Source: according to data of the MA OPE 2014-2020; * the contract of the Sofia Municipality will not be implemented

Table 42. Changes in PA2 indicators

Type of Indicator	Indicator	Initial Target Value	Target Value at Time of Assessment
Execution	SO17 Additional waste recycling capacity (ton/year)	105,000	240,000
Result	2.1. Reduced amount of landfilled household waste (ton/year)*	2,323,000 (based on 2,038,000)	650,000 (540,000**) at a base value of 0

Source: according to data of the MA OPE 2014-2020; * the name of the indicator has been changed. Initially, the indicator was: Amount of landfilled household waste ** approved change by the OPE MC from May 2020 and with EC Implementation Decision No. C(2020) 4105 of June 16, 2020;

The performance indicator "Additional capacity for the recovery of household waste (to obtain energy) (ton/year)" has been removed (decision of the OPE MC of May 2023). Program change approved by Decision No. C (2023) 5883 of 25 August 2023.

Priority Axis 3 "Natura 2000 and Biodiversity"

Table 43. Achieving the objectives of the PA3 outcome indicators by June 2023.

Indicator	Base value	Target value	Achieved 2023	
			Value	(%)
3.1 Species with improved conservation status	48.36% of species are in favorable status as of 2013.	49.18% of the species have improved or preserved favorable assessments of the nature conservation status as of 2020.	48.36%	0%
3.2 Bird species with improved status	82.50% of birds are in favorable condition as of 2013.	83.33% of the birds are in an improved or maintained secure status as of 2020.	82.50%	0%
3.3 Habitats with improved nature conservation status	5.56% of habitats were in a favorable condition as of 2013.	7.78% of the habitats have improved or preserved favorable assessments of the nature conservation status as of 2020.	5.56%	0%

Source: according to Data of the OPE 2014-2020 MA

Table 44. Achieving the objectives of the performance indicators under PA3 by June 2023.

Indicator	Target value	Achieved 2023		Expected under contracts
		Value	(%)	
CO23 Area of <u>habitats</u> supported to achieve a better degree of conservation (ha)	1,565,668.00	1,274,220.96	81%	1,357,184.76
3.4 Area of <u>habitats of species</u> supported to achieve a better degree of conservation (ha)	2,878,749.00	967,766.48	34%	1,662,642.43
3.5 Inventoried protected areas, including the Black Sea water area (number)	17	0	0%	17
3.6 Conducted national information campaigns (number)	3	1	33%	3
3.7 "Area of the territory of the Natura 2000 network with an established management structure" (ha)	4,104,320.00	0	0	0

Source: according to data of the MA OPE 2014-2020;

No indicators have been changed on this priority axis. With changes in the program, indicator 3.7 "Area of the territory of the Natura 2000 network with an established management structure" has been dropped due to unimplemented legislative reforms in the management of the Natura 2000 network in Bulgaria.

Priority axis 4 "Flood and Landslide Risk Prevention and Management"

Table 45. Achieving the objectives of the PA4 result indicators by June 2023.

Indicator	Base value	Target value	Achieved 2023	
			Value	(%)
4.1 Areas with a significant potential flood risk, where the population is not prepared for an adequate flood response (number)	116	26	17	110%
4.2 Reduction of the population at risk of landslides (persons)	520,000	300,000	446,434	33%

Source: according to Data of the OPE 2014-2020 MA

Table 46. Achieving the objectives of the performance indicators under PA4 by June 2023.

Indicator	Target value	Achieved 2023		Expected under contracts
		Value	(%)	
CO20 Number of residents benefiting from flood protection measures (number)	2,750,000	150,237	5%	2,101,979
4.3. Established centers to increase the population's preparedness for an adequate response to floods (number)	6	6	100%	6
4.4 Reinforced landslides (ha)	80	32.90	41%	97.51

Source: according to data of the MA OPE 2014-2020;

Table 47. Changes in PA4 indicators

Type of Indicator	Indicator	Initial Target Value	Target Value at Time of Assessment
Result	Reduction of population at risk of landslides (persons)	460,000	300,000

Priority Axis 5 "Improving Ambient Air Quality"

Table 48. Achieving the objectives of the PA5 result indicators by June 2023.

Indicator	Base value	Target value	Achieved 2023	
			Value	(%)
5.1 Quantity of FPM ₁₀ (tons/year)	7,347.71	7,001.15	7,343.68	1%

Source: according to Data of the OPE 2014-2020 MA

Table 49. Achieving the objectives of the performance indicators under PA5 by June 2023.

Indicator	Target value	Achieved 2023		Expected under contracts
		Value	(%)	
5.3 Population covered by the measures to reduce the quantities of FPM ₁₀ and NO _x (persons)	3,000,000	282,042	9%	3,120,610
5.4 Projects aimed at reducing the amounts of FPM ₁₀ and NO _x	19	8	42%	20

Source: according to data of the MA OPE 2014-2020;

Table 50. Changes in PA5 indicators

Type of Indicator	Indicator	Initial Target Value	Target Value at Time of Assessment
Execution	Population covered by the measures to reduce the amounts of FPM ₁₀ and NO _x (persons)	1,300,000	3,000,000
Execution	Projects aimed at reducing the amounts of FPM ₁₀ and NO _x	5	19
Result	Quantity of FPM ₁₀ (tons/year)	7,017.71	7,001.15

Priority axis 6 "Technical Assistance"

Table 51. Achieving the objectives of the outcome indicators under PA6 by June 2023.

Indicator	Base value	Target value	Achieved 2023	
			Value	(%)
Average time to approve a project proposal (number of days)	155	90	44	171%
Average time for funds request verification (number of days)	90	85	49	720%
Level of public awareness of OPE (%)	40%	60%	69.60%	148%
Degree of satisfaction of the beneficiaries of technical assistance measures and conducted trainings (%)	35%	60%	94*	236%

Source: according to Data of the OPE 2014-2020 MA

Table 52. Achieving the objectives of the performance indicators under PA6 by June 2023.

Indicator	Target value	Achieved 2023	
		Value	(%)
Trained employees of the MA (number)	123	174	142%
Trainings for MA employees (number)	24	24	100%
Employed persons (full-time), whose salaries are co-financed by TA (number)	123	117	95%
Assessments carried out under the program (number)	5	7	140%

Information campaigns (number)	7	8	114%
Trainings for employees of beneficiaries (number)	40	60	150%
Trained employees of beneficiaries (number)	1,400	1818	130%

Source: according to data of the MA OPE 2014-2020;

Table 53. Changes in indicators under PA6

Type of Indicator	Indicator	Initial Target Value	Target Value at Time of Assessment
Result	Average time to approve a project proposal (number of days)	147	90*

* The target value has been changed according to the legislative terms for the evaluation of the project proposals specified in Art. 33, para. 2 of the Law on Management of ESIF Funds.

Priority Axis 7 "Support for Refugees from Ukraine in Bulgaria"

Table 54. Achieving the objectives of the outcome indicators under PA7 by June 2023.

Indicator	Base value	Target value	Achieved 2023	
			Value	(%)
Displaced persons from Ukraine who received initial reception and immediate support after arrival in Bulgaria	0	72,300	0	0%

Source: according to Data of the OPE 2014-2020 MA

Table 55. Achieving the objectives of the performance indicators under PA7 by June 2023.

Indicator	Target value	Achieved 2023		Expected under contracts
		Value	(%)	
Total number of persons who received support	72,300	0	0%	72,300
Number of children under 18 years	29,900	0	0%	29,900

Source: according to data of the MA OPE 2014-2020;

No changes were made to the indicators on the priority axis.

Annex 5. Results of the projects

PA1 "Waters"

BG 16M1OP002-1.005 Second phase of projects for the construction of water and sanitation infrastructure, the implementation of which was started under the 2007-2013 OPOS.

Beneficiary municipality	Additional number of residents with access to improved water supply (number)	Newly constructed water supply network (km)	Rehabilitated water supply networks (km)	Additional number of residents with access to improved wastewater treatment (PE)	- Built/Rehabilitated/Reconstructed WWTPs – 3	Newly constructed sewerage networks (km)	Rehabilitated sewerage networks (km)	Load of pollution, which is collected and treated in full accordance with the applicable legislation, (PE)
Bansko	29,784	1.28	5.1	29,784	1	6.87	11.79	29,784
Varna	-	-	-	72,122	1	3.75	-	72,122
Vidin		-	-	51,733 56,000	1	-	-	51,733 56,000
Vratsa	71,508 78,701	-	51.03 111.06	91,753 94,000	1	10.09 24.84	8.48	91,753 94,000
Radnevo	-	-	-	16,317	1	-	-	16,317
Tervel	-	-	-	8,079	1	-	-	8,079
Shumen	-	-	-	3,800	1	-	-	3800
Yambol	19,047	-	0.99	106,248	1	0.05	1.56	106,248
Total	120,399 127,532	1.28	57.12 117.15	379,836 386,350	8	20.76 35.51	21.83	379,836 386,350

Source: UMIS 2020; The actually achieved values of projects that have been completed or are in progress as of 30.06.2023 are presented in green font. The target values for projects that have not yet been completed are marked in black font.

BG16M1OP002-1.006 Implementation of early WSS projects

Beneficiary municipality	Additional number of residents with access to improved water supply (number)	Reduction of physical water losses by (%)	Additional number of residents with access to improved wastewater treatment (PE)	- Built/Rehabilitated/R reconstructed WWTPs – 3	Load of pollution, which is collected and treated in full accordance with the applicable legislation, (PE)
Asenovgrad	5,567	from 53 to 46	63,373	1	63,373

Dobrich	91,904 92,498	from 63 to 48.01	109,977 111,800	1	109,977 111,800
Pleven (Dolna Mitropolia)	12,995	49.09 to 36.72	131,154	1	131,154
Plovdiv	14,700	47.74 to 45.27	415,468	1	415,468
Total	110,466 125760	-	304,504 721,795	3 4	304,504 721,795

Source: UMIS 2020; The values reached as of 30.06.2023 are marked in green;

BG16M1OP002-1.009 Implementation of early water and sanitation projects - component 2

Beneficiary municipality	Additional number of residents with access to improved water supply (number)	Reduction of physical water losses by (%)	Additional number of residents with access to improved wastewater treatment (PE)	- Built/Rehabilitated/R econstructed WWTPs – 3	Load of pollution, which is collected and treated in full accordance with the applicable legislation, (PE)
Chirpan	0	0	12,971	1	12,971
Aytos	-	-	21,365	1	21,365
Elhovo	419	9	10,732	1	10,732
Primorsko	-	-	55,000	1	37,065
Tutrakan	933	5	9562	1	9,562
Total	1,352	14	109,630	5	91,695

Source: UMIS 2020; The values reached as of 30.06.2023 are marked in green;

BG16M1OP002-1.014 Regional investment WSS project for the designated territory of "WSS" EOOD Smolyan

WSS Operator	Additional number of residents with access to improved water supply (number)	Reduction of physical water losses by (%)	Additional number of residents with access to improved wastewater treatment (PE)	- Built/Rehabilitated/ Reconstructed WWTPs – 3	Load of pollution, which is collected and treated in full accordance with the applicable legislation, (PE)
WSS Smolyan	26,071	47.68	29,801	1	29,801

Source: UMIS 2020

BG16M1OP002-1.016 Construction of WSS infrastructure

WSS Operator	Additional number of residents with access to improved	Reduction of physical water losses by (%)	Additional number of residents with access to	- Built/Rehabilitated/	Load of pollution, which is collected and treated in full
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	water supply (number)		improved wastewater treatment (PE)	Reconstructed WWTPs – 3	accordance with the applicable legislation, (PE)
WSS Vratsa	77,845	from 68.50% to 48.75%	3,931	2	3,931
WSS Ruse	138,250	from 51% to 32%	20,301	0	20,301
WSS Pernik	79,203	from 76.52% to 72.80%	6,448	1	6,448
WSS Silistra	45,531	from 62.30% to 52.85%	10,630	0	10,630
WSS Vidin	38,594	from 40.13% to 28.77%	9,900	0	9,900
WSS Plovdiv	430,680	from 60.34% to 56.30%	332,284	0	332,284
WSS Yambol	73,283	from 71.9% to 60.78%	10,764	0	10,764
WSS Varna	330,015	from 61.01 to 56.35%	273,011	0	273,011
WSS Sliven	101,440	from 78.16% to 63.21%	125,535	2	125,535
WSS Kardzhali	63,085	from 42.7% to 35.35%	24,896	0	24,896
WSS Stara Zagora	226,237	from 72.88 to 59.02%	233,495	1	233,495
WSS Burgas	279,011	from 48% to 33%	324,566	4	324,566
WSS Shumen	92,346	from 78.6% to 70.07%	45,105	0	45,105
Total	1,975,520	-	1,375,761	10	1,375,761

Source: UMIS 2020; Projects likely to be completed in the period 2021-2027 are marked in red

BG161M1OP002-1.020 Construction of WSS infrastructure in Sofia Municipality

Beneficiary municipality	Additional number of residents with access to improved wastewater treatment (PE)	- Built/Rehabilitated/Reconst ructed WWTPs – 3	Load of pollution, which is collected and treated in full accordance with the applicable legislation, (PE)
Sofia Municipality	12,434	1	1,393,380

Source: UMIS 2020; The project of the Sofia Municipality is also expected to be completed in the period 2021-2027

PA2 "Waste"

Project	Additional waste recycling capacity (t/year)	Reduced amount of landfilled household waste (tons/year)
Combined procedure for designing and building composting plants and municipal waste pre-treatment plants: Batak, Belovo, Bratsigovo, Lesichovo, Peshtera, Pazardzhik and Septemvri	12,598	79,280
Design and construction of additional infrastructure /installation for preliminary treatment of household waste and composting installation for separately collected biodegradable and/or green waste/ for the development of the regional waste management system of the Blagoevgrad region, including the municipalities of Blagoevgrad, Simitli, Rila, Kocherinovo and Boboshevo	2,516	28,151
Construction of a plant for preliminary treatment of mixed household waste and a plant for composting green waste from the municipalities of Velingrad and Rakitovo	4,000	22,561
Construction of a pre-treatment plant and a composting plant within the Regional Waste Management System in Gotse Delchev Region	2,100	8,226
Design and construction of a composting plant and a plant for the pre-treatment of household waste for the needs of the municipalities from the Dospat RWMA	6,400	4,857
Construction of environmental infrastructure for the Rila Eco RWMA	3,000.00	23,994.00
Design and construction of a composting plant and a plant for pre-treatment of household waste on the territory of the Madan RDHW, for the municipalities of Madan, Zlatograd and Nedelino	2,095.00	4,926.58
Design and construction of a composting installation and an installation for pre-treatment of domestic waste for the municipalities of the Razgrad RWMA	4,168.00	26,849.00
Investment project "Composting installation for separately collected green and biodegradable waste, installations for pre-treatment of household waste and accompanying infrastructure for the Regional Waste Management System of the municipalities of Sandanski, Strumyani and Kresna"	2,623.00	7,632.01
Design and construction of additional infrastructure (installation for preliminary treatment of household waste and composting installation for separately collected biodegradable and/or green waste) for the development of the regional waste management system of the Troyan region, including the municipalities of Troyan and Apriltsi	2,200.00	8,497.00
Design and construction of a composting plant and a pre-treatment plant for domestic waste for the municipalities of Dupnitsa, Bobov Dol and Sapareva Banya	4,173	13,825.41
Design and construction of composting installations and an installation for pre-treatment of household waste on the territory of the Kostinbrod RWMA	9,988.00	21,399.00

Construction of a pre-treatment plant and composting plants within the framework of the Regional Waste Management System in the Oryahovo Region"	8,700.00	8,714.73
"Design and construction of a composting plant and a plant for pre-treatment of household waste in the Gorna Malina Region"	4,000	10,161.00
Construction of a composting plant and a plant for the pre-treatment of household waste for the needs of the Wastewater Treatment Plant-Botevgrad Region	2,700	10,828
Design and construction of a composting plant and a plant for pre-treatment of household waste in the municipality of Petrich	4,150.00	10,211.21
Design and construction of an anaerobic installation for separately collected biodegradable waste for the regional waste management system of the Blagoevgrad Region	15,819.00	26,344.50
Construction of an anaerobic installation for separately collected biodegradable waste on the territory of the Burgas region	30,652.00	71,311.00
Design and construction of an anaerobic installation for separately collected biodegradable waste on the territory of Ruse RWMA	17,845.00	9,098.46
Implementation of a decentralized model for bio-waste management in the municipalities of Sevlievo, Dryanovo and Suhindol, including construction of the necessary technical infrastructure – a system for separate collection and a facility for recycling the collected bio-waste.	3,900.00	0
Design and construction of a composting plant for separately collected green and/or biodegradable waste in the municipalities of Berkovitsa and Varshets	3,696.00	5,341.61
Construction of an installation for composting separately collected green waste - Vratsa region	8,000.00	8,983.13
Design and construction of a composting plant for separately collected green and/or biodegradable waste for the municipalities of Valchedrum and Yakimovo	2,257.00	1,917.65
Design and construction of a composting plant for separately collected green and/or biodegradable waste, incl. provision of the necessary equipment and facilities and equipment for the separate collection of green and biodegradable waste" for the needs of the Municipality of Karlovo	6,500.00	3,258.36
"Design and construction of a composting plant for separately collected green and/or biodegradable waste, city of Lom"	3,004.00	1,488.16
Construction of a composting plant for separately collected green and/or biodegradable waste, including the provision of the necessary equipment and facilities and equipment for the separate collection of green and biodegradable waste on the territory of the municipality of Maritsa	6,200.00	4,890.00
Design and construction of a composting plant for separately collected green and/or biodegradable waste in the municipality of Montana	6,150.00	6,361.20
Construction of a composting plant for separately collected green and/or biodegradable waste, Plovdiv	15,000.00	60,303.00

Construction of a composting plant for separately collected green and biodegradable waste - municipality of Svilengrad	3,000.00	2,874.27
Second combined procedure for the design and construction of composting installations and installations for the pre-treatment of household waste under Axis 2 of the 2014-2020 OPE of the RWMA - Asenovgrad region	11,993.94	22,292.03
Construction of a composting plant and a plant for preliminary treatment of household waste on the territory of the municipality of Zlatitsa for the municipalities of Zlatitsa, Anton, Koprivshtitsa, Mirkovo, Pirdop, Chavdar and Chelopech	2,929.00	7,225.00
Design and construction of a composting plant for separately collected green and/or biodegradable waste generated by the municipality of Saedinenie and the municipality of Stamboliyski on the territory of the municipality of Saedinenie	6,170.00	925.00
Construction of a municipal facility for composting separately collected biodegradable and green waste of Harmanli Municipality	2,690.00	2,842.00
Design and construction of composting installations for separately collected green and/or biodegradable waste, incl. provision of the necessary equipment and facilities and equipment for the separate collection of green and biodegradable waste for the needs of the Municipality of Hisarya	2,900.00	1,574.02
Design and construction of a composting plant for separately collected green and/or biodegradable waste for the municipality of Chiprovtsi and the municipality of Georgi Damyanovo	2,128.00	545.37
Design and construction of a composting plant for separately collected green and biodegradable waste of Yambol Municipality	2,400.00	39,829.17
Design and construction of a composting plant for separately collected green and/or biodegradable waste generated by the Municipality of Krichim and the Municipality of Perushtitsa, including the provision of the necessary equipment and facilities and equipment for the separate collection of green and biodegradable waste	2,300.00	1,114.95
Total	230,944.94	547,232.82

Source: UMIS 2020; Completed projects are marked in green, and those at risk in red.

PA3 "Natura 2000 and Biodiversity"

Procedures	SO3.1 Improvement of the conservation status of species and habitats from the Natura 2000 network					
	Performance indicators		Result indicators			
	SO23 Nature and Biodiversity: Area of habitats supported to achieve a better degree of conservation (ha)	3.4 Area of habitats of species supported to achieve better conservation status (ha)	3.6 Conducted national information campaigns (number)	3.1 Species with improved conservation status	3.2 Bird species with improved status	3.3 Habitats with improved nature conservation status
3.005 Designation and completion of the network of marine protected areas	247,723.96					
3.006 Raising stakeholder awareness of the Natura 2000 network			1			
3.007 Improvement of the nature conservation status of species and types of natural habitats on the territory of the Natura 2000 network falling into national parks, natural parks and maintained reserves				8 42	10	14 33
3.008 LAG Pomorie measure 6 "Improvement of the nature protection status of species in the Natura 2000 network through the approach of the EPA in the territory of LAG Pomorie"						1
3.015 Implementation of priority measures in wetlands.	2,108.69					
3.017 LAG SAMOKOV Improvement of the nature protection status of species from the Natura 2000 network through the CLLD approach on the territory of LAG Samokov				4		
3.019 Shared Vision for the Ecological Network Natura 2000 in Bulgaria	887,897.82 901,780.13	967,766.48				
3.021 Improving the Conservation Status of Natural Habitats	9,524.4					1 9

3.027 Measures for Improving the Conservation State of Birds - 2						
3.029 LAG Tutrakan-Slivo pole, Measure 109 OPE "Improving the nature protection status of species from the Natura 2000 network through the CLLD approach"				3		
3.031 Shared Vision for the Ecological Network Natura 2000 in Bulgaria - 2	386,323.14 386,323.14					
BG16M1OP002-3.033 "Improving the Conservation Status of Natural Habitats - 2"	1,330.00					2
Total	1,274,220.96* 1,301,066.36	967,766.48* 1,662,642.43		8 49	10	15 45

Source: UMIS 2020; The values achieved as of June 2023 are marked in green. In red is the project that will probably not be implemented. *The reporting of the real contribution to indicators SO23 "Nature and biological diversity: Area of habitat supported to achieve better conservation status" and 3.4 "Area of habitat of species supported to achieve better conservation status" is based on expert GIS-based reporting of progress.

PA4 "Flood and Landslide Risk Prevention and Management"

Procedures	SG4.1 Increase the protection and readiness for an adequate response of the population in case of floods			SG.4.2 Increasing the protection of the population from landslide processes	
	Performance indicators		Result indicators	Performance indicators	Result indicators
	Residents benefiting from flood protection measures (number)	Centers for increasing the preparedness of the population for an adequate response to floods (number)	Areas with a significant potential flood risk where the population is not prepared for an adequate flood response (number)	Reinforced landslides (ha)	Population at reduced risk of landslides (number)
4.001 Six centers for increasing the preparedness of the population in case of floods	91,690	6	97	-	-
4.002 National real-time water management system - river Iskar	1,300,000	-	4	-	-
4.003 Prevention and response to landslide processes	-	-	-	2.99 (RIA); 9.61 (RIA) 20.50 (Lom) 0.48 (Lukovit); 3.50 (Oryahovo); 5.21 (Oryahovo) 55 (Svoge); 0.08 (Sliven); 0.14 (Cherven Bryag)	9,071 (RIA); 145,813 (RIA) 4 303 (MRDPB); 1 961 (Lom); 2,726 (Lukovit); 4 118 (Oryahovo); 637 (Oryahovo); 39,061 (Svoge); 750 (Sliven) 50,000 (Cherven Bryag)
4.004 Flood risk prevention and management	51,217 (Gabrovo); 7017 (Galabovo); 313 (Svilengrad)	-	1 (Gabrovo) 1 (Svilengrad)	-	-
4.006 Integration, upgrading and optimization of processes for prevention, preparedness and response to risks of a natural nature	650,000	-	-	-	-
Total	150,237 2,108,115	6	99 103	32.90 97.51	73,566 258,440

Source: UMIS 2020; Completed projects are marked in green, and risky projects are in red

PA5 "Improving the quality of ambient air"

Beneficiary	Performance indicators		Result indicators
	Population covered by the measures to reduce the amounts of FPM10 and NOx (number)	Projects aimed at reducing the amounts of FPM10 and NOx (number)	Quantity of FPM ₁₀ (ton/year)
5.003 Measures to improve ambient air quality			
Burgas	205,329	1	55.03
Vidin	48,633	1	76.81
Gorna Oryahovitsa	27,317	1	27.44
Dimitrovgrad	45,840	1	57.8
Montana	46,208	1	75.5
Plovdiv	342,048	1	76.51
Smolyan	35,288	1	57.2
Sofia Municipality	1,336,554	1	254.72
Total	2,087,217	8	681.01
5.004 Measures to address transportation as a source of ambient air pollution			
<i>Stara Zagora</i>	<i>130,751</i>	<i>1</i>	<i>0.83</i>
<i>Burgas</i>	<i>207,988</i>	<i>1</i>	<i>3.93</i>
<i>Varna</i>	<i>340,370</i>	<i>1</i>	<i>2.38</i>
<i>Vratsa</i>	<i>50,762</i>	<i>1</i>	<i>0.3</i>
Ruse	137,403	1	0.78
<i>Pleven</i>	<i>95,250</i>	<i>1</i>	<i>0.16</i>
<i>Pernik</i>	<i>70,888</i>	<i>1</i>	<i>0.08</i>
<i>Sliven</i>	<i>117,873</i>	<i>1</i>	<i>0.26</i>
Haskovo	71,229	1	0.1
<i>Sofia Municipality</i>		<i>1</i>	<i>4.16</i>
<i>Sofia Municipality</i>	<i>1,341,938</i>	<i>1</i>	<i>3.03</i>
<i>Sofia Municipality</i>		<i>1</i>	<i>0.63</i>
Total	2,490,954	12	16.64
TOTAL for the 2 procedures	3,036,288	20	698

Source: UMIS 2020; Completed projects are marked in green; and in green italics are those where deliveries of greener vehicles have ended and the latter are already in service.

Annex 6. Contribution of OPE to sectoral policies and national and European legislation

Table 56. Contribution of OPE to normative and strategic documents in the "Water" sector

OPE measures	EU policies/international acts	National/regional plans and strategies	Regulatory acts of the EU	National legal framework
Construction of WSS infrastructure	<p>European Union: EU strategy for the Danube region (priority area "Water protection and restoration")</p> <p>Blueprint for the protection of Europe's water resources until 2020</p> <p>EU Strategy for Adaptation to Climate Change</p> <p>International agreements: Convention on Cooperation in the Conservation and Sustainable Use of the Danube River (Convention on the Conservation of the Danube River)</p>	<p>National Strategy for Management and Development of the Water Sector 2012-2037.</p> <p>Strategy for Environmental Protection in the Marine Waters of the Black Sea of the Republic of Bulgaria (Marine Strategy) and program of measures 2016-2021.</p> <p>Strategy for the development and management of water supply and sewage in the Republic of Bulgaria for the period 2014-2023.</p> <p>National Strategic Plan for the management of sludge from urban wastewater treatment plants on the territory of the river. Bulgaria for the Period 2014-2020</p> <p>General Strategy for the management and development of hydromelioration and protection from the harmful effects of water - 2030.</p> <p>River Basin Management Plans 2016-2021</p>	<p>European Union: Directive 2000/60/EC (the Framework Directive);</p> <p>Directive 2008/56/EC (Marine Strategy Framework Directive);</p> <p>Directive 91/271/EEA on the quality of drinking water;</p> <p>Directive 2008/105/EC laying down environmental quality standards in the field of water policy</p> <p>Directive (EU) 2020/2184 on the quality of water intended for human consumption);</p> <p>Directive 2006/118/EC on the protection of groundwater against pollution</p> <p>Directive 2013/51/EURATOM to determine requirements for the protection of the health of the population with regard to radioactive substances in water intended for human</p>	<p>Environmental Protection Act; Waters Act</p> <p>Water Supply and Sewerage Services Regulation Act;</p> <p>Law on Planning;</p> <p>Ordinance No. 9 of 16.03.2001 on the quality of water intended for drinking and domestic purposes;</p> <p>Ordinance on the Regulation of the Quality of Water Supply and Sewerage Services for the regulatory Period 2017-2021,</p> <p>Ordinance No. 7 of 14.11.2000 on the conditions and procedure for discharge of industrial wastewater into the sewage systems of populated areas,</p> <p>Ordinance No. 1 of 10.10.2007 on exploration, use and protection of groundwater,</p> <p>Ordinance No. H-4 of 14.09.2012 on the</p>
Improving the monitoring of the chemical state of groundwater				
Development and introduction of methods for the analysis of water, sediments and biota and finishing the equipping of EEA laboratories				
Preparation of environmental assessments for the purposes of adopting the River Basin Management Plans for the period 2016 - 2021 and the Marine Strategy and Program of Measures.				

The development of River Basin Management Plans for the period 2022-2027.	Convention for the Protection of the Black Sea from Pollution Strategic Action Plan for Environmental Protection and Restoration of the Black Sea	Flood Risk Management Plans 2016-2021		characterization of surface waters.
<p>OPE contribution to June 2023:</p> <p>Load of pollution, which is collected and treated in full accordance with the applicable legislation, (PE.) - 396,199</p> <p>Water bodies with improved monitoring of the quantitative condition (number) - 90</p> <p>Water bodies with improved monitoring of the chemical condition (number) - 173</p> <p>Additional number of residents with access to improved water supply (number) – 232,157 (estimated contribution 2,142,957)</p> <p>Additional number of residents with access to improved wastewater treatment (PE) – 793,970 (estimated contribution 2,250,329)</p> <p>Built/rehabilitated/reconstructed WWTPs (number) – 16 (expected contribution 29)</p> <p>New/updated analytical/program/strategy documents (number) – 15 (expected contribution 24)</p>				

Table 57. Contribution of OPE to normative and strategic documents in the "Waste" sector

SG1 Reduction of the amount of landfilled household waste	EU policies/international acts	National/regional plans and strategies	Regulatory acts of the EU	National legal framework
Design and construction of composting installations and installations for pre-treatment of household waste	<p>European Union:</p> <p>Framework Package Energy and Climate 2030</p>	<p>Circular Economy Transition Strategy 2022-2027 and Action Plan</p>	<p>Directive 2008/98/EC on waste and repealing certain directives (Waste Framework Directive)</p>	<p>Waste Management Act</p> <p>Environmental Protection Act</p>
Design and construction of anaerobic installations for	<p>EC Communication of 4 November 2008 on the Raw Materials</p>	<p>National Strategic Plan for gradual reduction of the amount of biodegradable</p>	<p>Directive (EU) 2018/850 amending Directive</p>	

separately collected biodegradable waste	Initiative: meeting our basic needs for growth and jobs in Europe	waste destined for landfill 2010-2020.	1999/31/EC on the landfill of waste	Ordinance on separate collection of bio-waste and treatment of biodegradable waste
Design and construction of composting installations for separately collected green and/or biodegradable waste	European Green Deal International agreements:	National Waste Management Plan 2014-2020	Directive 94/62/EC on packaging and packaging waste, as amended by	Ordinance on packaging and packaging waste
Landfill reclamation for closure subject to EU infringement proceedings in case C-145/14	Convention on Cooperation in the Conservation and Sustainable Use of the Danube River (Convention on the Conservation of the Danube River)	National Waste Management Plan 2021-2028	Directive (EU) 2018/852 in relation to the circular economy package	Ordinance No. 4 on the conditions and requirements for the construction and operation of incineration plants and waste co-incineration plants
Investments in WWTP sludge treatment	United Nations Framework Convention on Climate Change (Paris Agreement)			Ordinance No. 6 on the conditions and requirements for the construction and operation of landfills and other facilities and installations for the recovery and disposal of waste
<p>OPE contribution as of June 2023:</p> <p>Reduced amount of landfilled household waste (tons/year): 307,488.26</p> <p>Completed technical reclamation of landfills, subject to a procedure for violation of EU law in connection with the decision of the Court of the European Union of 16.072015 in case C-145/14.</p> <p>Additional waste recycling capacity (tons/year): 98,636; (expected contribution - 226,694.94)</p>				

Table 58. OPE contribution to regulatory and strategic documents in the Biodiversity sector

OPE measures	EU policies/international acts	National/regional plans and strategies	Regulatory acts of the EU	National legal framework
Measures to improve the conservation status of habitats and species	European Union:	Strategy for Biological Diversity in the Republic of Bulgaria	EU legislation: Directive 2009/147/EC on the quality of drinking water:	Biological Diversity Act Protected Areas Act

Defining and supplementing the network of marine protected areas	EU Biodiversity Strategy 2020 (Objectives 1 and 2);	The National Priority Framework for Action for Natura 2000 (NPFA)	Directive 92/43/EEC on the protection of natural habitats and wild flora and fauna	Environmental Protection Act
Development of a management approach for the Natura 2000 network and for the management of the NPFA	Blueprint for the protection of Europe's water resources until 2020	National Strategy for the development of the forestry sector in the Republic of Bulgaria for the period 2013-2020.		Medicinal Plants Act
Analyzes and studies of species and natural habitats subject to reporting under Art. 17 of the Habitats Directive and Art. 12 of the Birds Directive	EU Strategy for the Danube Region	Strategic Plan for the development of the forestry sector (2014 -2023)		Fisheries and Aquaculture Act
National and regional information campaigns	European Green Deal	The National Strategy for Regional Development 2012-2022 (Priorities 1.2. and 1.3.)		Ordinance on the conditions and procedures for carrying out an evaluation of the compatibility of plans, programs, projects and investment proposals with the subject and objectives of the protection of protected areas
	International acts:	Action Plans for plant and animal species		Ordinance on the terms and conditions for developing and approving management plans for protected areas
	Convention on Biological Diversity	National Strategy for sustainable development of tourism in the Republic of Bulgaria (2014-2030)		Ordinance on the development of management plans for protected areas
	Convention for the Protection of the Black Sea from Pollution/Protocol for the Protection of Biological and Landscape Diversity in the Black Sea;			Ordinance No. 5 of 1.08.2003 on the terms and conditions for developing action plans for plant and animal species
	Ramsar Convention on Wetlands			
	Convention for the Protection of Wild European Flora and Fauna and Natural Habitats			
	Convention for the Conservation of Migratory Species of Wild Animals			
	European Landscape Convention			
OPE contribution to June 2023:				
Area of habitats supported to achieve a better degree of conservation (ha): 1,274,220.96; (expected contribution – 1,357,184.76)				
Area of habitats of species supported to achieve a better degree of conservation (ha): 967,766.48; (expected contribution – 1,662,642.43)				

Table 59. Contribution of OPE to regulatory and strategic documents in the sector "Floods and Landslides"

OPE measures	EU policies/international acts	National/regional plans and strategies	Regulatory acts of the EU	National legal framework
Implementation of studies and evaluations in connection with the second FRMP for the period 2022-2027.	<p>European Union: EU Strategy for Adaptation to Climate Change</p> <p>Decision 1313/2013/EU of the European Parliament and of the Council on a Union Civil Protection Mechanism</p> <p>Communication from the Commission (COM (2009) 82) on a Community approach to the prevention of natural and man-made disasters</p> <p>Blueprint for the protection of Europe's water resources until 2020</p> <p>EU Strategy for the Danube Region.</p>	<p>Disaster Risk Reduction Strategy (2014-2020 and 2018-2030)</p> <p>National Disaster Protection Program 2014-2018</p> <p>National Strategy for Management and Development of the Water Sector in the Republic of Bulgaria.</p> <p>The National Program for the Prevention and Limitation of Landslides on the Territory of the Republic of Bulgaria, Erosion and Abrasion along the Danube and Black Sea coasts 2015-2020.</p> <p>National Strategy for the development of the forestry sector in the Republic of Bulgaria 2013-2020.</p> <p>Long-Term Climate Change Mitigation Strategy until 2050 of the Republic of Bulgaria.</p> <p>The basin directorates Flood Risk Management Plans 2016-2021</p> <p>National Climate Change Adaptation Strategy and Action Plan to 2030.</p> <p>General Strategy for the management and development of hydromelioration and protection from the harmful effects of water - 2030.</p> <p>Third National Climate Change Action Plan 2013-2020</p>	<p>Directive 2007/60/EC on flood risk evaluation and management.</p> <p>Directive 2008/114/EC on the identification and designation of European critical infrastructures and the evaluation of the need to improve their protection, repealed by</p> <p>Directive 2022/2557 on the resilience of critical entities</p>	<p>The Disaster Protection Act</p> <p>Law on Planning;</p> <p>Climate Change Limitation Act</p> <p>Ordinance No. 1/1994 on geoprotection activity;</p> <p>Ordinance No. 12/2001 on the design of geoprotective structures, buildings and facilities in landslide areas, etc.</p>
Increasing the preparedness of the population for an adequate response to floods and subsequent crises				
Measures to introduce solutions for flood risk prevention and management				
Creation of a National Water Management System in real time				
Expansion of the system of early warning and notification of the population at the LAU level and modernization of the EWRS of the executive authorities				
Prevention and counteraction of landslide processes to limit their risk				
<p>OPE contribution to June 2023:</p> <p>Areas with a significant potential flood risk where the population is not prepared for an adequate flood response (number): 17</p>				

Reduction of population at risk of landslides (persons): 446,434
 Number of residents benefiting from flood protection measures (number): 150,237; (expected contribution – 2,101,979)
 Established centers to increase the population's preparedness for an adequate response to floods (number): 6
 Reinforced landslides (ha): 32.90; (expected contribution – 95.01)

Table 60. Contribution of OPE to regulatory and strategic documents in the Air sector

Measures of OPE - SGI:	EU policies/international acts	National/regional plans and strategies	Regulatory acts of the EU	National legal framework
Development/Update of municipal atmospheric air quality programs	EU Strategy for the Danube Region	The National Program for the Improvement of Ambient Air Quality (NPIAAQ) 2018 - 2024.	Directive 2008/50/EC on ambient air quality and cleaner air for Europe	Clean Air Act;
Measures to improve the quality of atmospheric air	International agreements: Convention on Long-range Transboundary Air Pollution and the Gothenburg Protocol thereto (as amended)	Municipal programs for AAQ (according to Art. 27 of CAA)	Directive (EU) 2016/2284 on the reduction of national emissions of certain atmospheric pollutants;	Spatial Data Access Act
Creation of an information system for reporting data on atmospheric air quality as part of the National System for real-time monitoring of air quality.	The United Nations Framework Convention on Climate Change and the Kyoto Protocol.		Directives 2008/850/EU and 2004/107/EC on the mutual exchange of information and reporting on AAQ.	Ordinance No. 12 of 15.07.2010 on norms for sulfur dioxide, nitrogen dioxide, fine particle matter, lead, benzene, carbon monoxide and ozone in atmospheric air;
Measures to address transport as a source of air pollution			Directive 2007/2/EC on the creation of spatial information in the EC (INSPIRE) ⁹⁹ ;	Ordinance No. 7 on evaluation and management of atmospheric air quality
OPE contribution to June 2023:				
Reduced FPM10 (tons/year): 4 t/year, expected contribution 698 t/year				
Population covered by the measures to reduce the amounts of FPM10 and NOx (persons): 282,042, expected contribution: 3,120,610 persons				

⁹⁹Amended by Directive 2015/1480/EU

Annex 7. List of municipalities included in the impact group and in the control groups of the counterfactual study

Table61 . Municipalities included in the impact group for the counterfactual analysis, OPE 2014-2020

Procedure	Municipality	End of project, year
2.002	Sandanski	2020
2.002	Strumyani	2020
2.002	Kresna	2020
2.005	Svilengrad	2020
2.007	Sevlievo	2020
2.007	Dryanovo	2020
2.007	Suhindol	2020
2.002	Madan	2021
2.002	Zlatograd	2021
2.002	Nedelino	2021
2.002	Petrich	2021
2.005	Maritsa	2021
2.005	Montana	2021
2.005	Plovdiv	2021
2.005	Harmanli	2021
2.006	Zlatitsa	2021
2.006	Anton	2021
2.006	Koprivshitsa	2021
2.006	Mirkovo	2021
2.006	Pirdop	2021
2.006	Chavdar	2021
2.006	Chelopech	2021

Source: UMIS 2020

Table 62. Municipalities included in the impact group, OPE 2007-2013¹⁰⁰

Municipality	Composting plants	Separation plants/MBT
Aytos	*	*
Aksakovo	*	
Balchik	*	*
Bansko	*	
Belitsa	*	
Belogradchik	*	
Beloslav	*	
Boynitsa	*	
Bratya Daskalovi	*	*
Bregovo	*	
Burgas	*	*
Varna	*	
Veliko Tarnovo	*	*
Vidin	*	
Gabrovo	*	*
General Toshevo	*	
Gramada	*	
Gurkovo	*	*
Galabovo	*	*
Dimitrovgrad	*	*
Dimovo	*	
Dobrich	*	*
Dolna Banya	*	*
Ihtiman	*	*
Kazanlak	*	*
Kameno	*	*
Karnobat	*	*
Kostenets	*	*
Krushari	*	
Kula	*	
Lukovit	*	
Makresh	*	
Mineralni Bani	*	*
Maglzh	*	*
Nesebar	*	*
Nikola Kozlevo	*	
Novo Selo	*	
Dobrichka municipality	*	*
Opan	*	*

¹⁰⁰Only municipalities for which there is data on landfilled household waste for at least one of the years 2017-2021 are included.

Pavel Banya	*	*
Panagyurishte	*	
Pomorie	*	*
Radnevo	*	*
Razlog	*	
Roman	*	
Ruen	*	*
Ruzhitsi	*	
Samokov	*	*
Sredets	*	*
Stara Zagora	*	*
Sofia	*	*
Strelcha	*	
Sungurlare	*	*
Tryavna	*	*
Haskovo	*	*
Chirpan	*	*
Chuprene	*	
Yakoruda	*	

Table63 . Municipalities included in the control group for the counterfactual analysis

Procedure	Municipality	Procedure	Municipality
2.004	Vetovo	2.005	Varshets
3.019	Madzharovo	2.002	Gorna Malina
2.010	Polski Trambesh	2.002	Gotse Delchev
2.004	Ruse	2.002	Garmen
2.004	Slivo Pole	2.002	Devin
5.002	Smolyan	2.002	Dospat
1.009, 2.004, 3.029	Tutrakan	2.002, 2.010	Dupnitsa
2.002, 2.004, 2.010	Boboshevo	2.002	Etropole
2.002	Borino	2.002	Knezha
2.002	Borovan	2.002, 2.004, 2.010	Kocherinovo
2.002	Botevgrad	2.005	Krichim
2.002	Byala Slatina	2.006	Kuklen
2.002, 2.010	Velingrad	2.002	Kyustendil
2.005, 4.003	Lom	2.002, 2.004, 2.010	Simitli
2.006, 3.031	Lucky	2.005	Saedinenie
2.002	Misia	2.002, 2.010	Treklyano
2.002, 2.010	Nevestino	2.002	Hadzhidimovo

Procedure	Municipality	Procedure	Municipality
2.002, 4.003	Oryahovo	2.002	Hayredin
2.005	Perushtitsa	2.002	Rakitovo
2.002	Pravets	2.006	Sadovo
2.006	Parvomai	2.002, 2.010	Sapareva Banya
2.002	Razgrad	2.002	Satovcha

Source: UMIS 2020

Table 64. Number of municipalities included in the counterfactual analysis

Year	Impact Group, OPE 2014-2020,	Impact Group OPE 2007-2013	Control group
All municipalities			
2017*	20	53	37
2021**	18	49	36
Municipalities with a population of up to 20,000 inhabitants			
2017*	12	34	26
2021**	12	31	27
Municipalities with a population of over 20,000 inhabitants			
2017*	8	19	11
2021**	6	18	9

* data for 2017 or 2018; ** data for 2021 or 2020

Table 65. Net effect on landfilled amounts of household waste per capita

No.	Year	Impact group, OPE 2014 – 2020, kg./cap.	Impact group, OPE 2007 – 2013, kg./cap.	Control group, kg/cap.	Net effect, OPE 2014- 2020	Net effect, OPE 2007 – 2013
	(1)	(2)	(3)	(4)	(5)=(2)-(4)	(6)=(3)-(4)
All municipalities						
A	2017*	169.2	162.4	248.6	24.3	49.8
B	2021**	174.0	192.6	229.1		
B	First difference	4.8	30.3	-19.5		
Municipalities with a population of up to 20,000 inhabitants						
A	2017*	153.6	187.6	248.7	54.0	44.5
B	2021**	218.1	242.6	259.1		
B	First difference	64.4	54.9	10.4		
Municipalities with a population of over 20,000 inhabitants						

A	2017*	192.6	117.1	248.2	2.5	98.8
B	2021**	85.9	106.6	139.0		
C	First difference	-106.7	-10.5	-109.3		

* data for 2017 or 2018; ** data for 2021 or 2020

The differences in the values of the studied variable before and after the intervention for the two groups, the impact group and the control group, were calculated (first difference $C=A-B$). The difference between the resulting value for the exposure group and the control group was then calculated (second difference). The second difference is the evaluation of the net effect of the intervention.

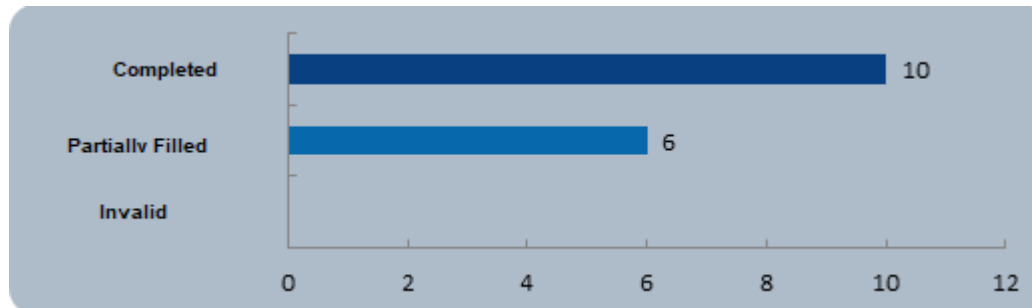
Annex 8. Interviews conducted

Organization	Date
Association Coalition for Nature Bulgaria	May 10, 2023
RIEW Sofia	May 11, 2023
Bulgarian Biodiversity Foundation	May 11, 2023
DNP Vitosha	May 12, 2023
Sofia Municipality	May 01, 2023 June 2, 2023
Ministry of the Interior, Directorate General "Fire Safety and Protection of the Population"	June 13, 2023
EEA, Directorate "Environmental Monitoring and Assessment"	June 14, 2023
National Park Pirin	June 15, 2023
Pomorie Municipality:	June 21, 2023
"Fund Manager of Financial Instruments in Bulgaria" EAD (FMFIB)	June 23, 2023
For Aytos Municipality:	June 26, 2023
National Association of Municipalities in the Republic of Bulgaria	June 29, 2023
MRDPW, Water Supply and Sewerage and Public Works Directorate	July 03, 2023
Ministry of Health	July 04, 2023
MOEW, Water Management Directorate	July 05, 2023
MOEW, Directorate "Waste Management and Soil Protection"	July 06, 2023
Municipality of Petrich	July 03, 2023
Municipality of Burgas	July 12, 2023
"Burgasbus" EOOD, Burgas municipality	July 12, 2023
Stara Zagora Municipality	July 13, 2023
Municipality of Etropole	July 17, 2023
Bulgarian W&S Holding EAD	July 18, 2023
RIEW-Plovdiv	July 20, 2023
MOEW, Directorate "National Service for the Protection of Nature"	July 21, 2023
MOEW, GD OPE	July 26, 2023
Road Infrastructure Agency	August 11, 2023

Annex 9. Online surveys

SURVEY AMONG WSS OPERATORS

Response statistics



	Number	Percentage
Completed	10	62.5
Partially filled	6	37.5
Invalid	0	0
Total	16	

1. Please note the status of your project:

Answer	Percentage	Number
In execution.	83.3%	10
Temporarily suspended.	8.3%	1
The project is scheduled for phasing confirmed by the OPE MA.	8.3%	1
	Total	12

2. Please explain why:

Answer
Site" Reconstruction and construction of the WSS network of the city of Plovdiv", which is implemented within the framework of the project, will not be able to be implemented within the current program period due to the following reasons: 1. Need for repair and reconstruction of the Main Drainage Channel "Markovski Collector"; 2. Unfinished procedures for obtaining the right of passage through properties of public state ownership, which are beyond the will and powers of the Beneficiary.
After a lawsuit, one WWTP included in the project became private property, but without notifying us that a lawsuit was pending or that the WWTP had become private. A few months after that, the development of the project ends and the MRDPW hands it over to us, after which we apply and find out from the MA that there is a problem with the ownership of the WWTP, the problem was not resolved and the MA postponed the project for the next program period.

3. What are the expectations regarding the achievement of the goals of your project by the end of 2023?

Answer	Percentage	Number
The project will fully achieve its objectives.	66.7%	8
The project will partially achieve its objectives.	33.3%	4
	Total	12

4. Please explain why:

Answer
Activity No. 7- "Reconstruction of water supply pipes from the dam Asenovets to WS Sliven" with Contract No. 17/28.02.2022, will not be completed until the end of 2023, due to a number of problems identified during the preparation of the technical project, some of which are: - Medium-voltage overhead power lines and a series of iron grid poles are located in the water pipeline's route in the easement of the water supply pipeline planned for reconstruction from the Asenovets dam. - In the village entity "Kiroolu" - city of Sliven, for the route through which the water pipeline passes, no regulation has been applied by the Municipality of Sliven and the owners of the properties subject to regulation have not been compensated
Site" Reconstruction and construction of the WSS network of the city of Plovdiv", which is implemented within the framework of the project, will not be able to be implemented within the current program period due to the following reasons: 1. Need for repair and reconstruction of the Main Drainage Channel "Markovski Collector"; 2. Unfinished procedures for obtaining the right of passage through properties of public state ownership, which are beyond the will and powers of the Beneficiary. In view of the above, the project is planned for phasing.
Delay in resolution of administrative procedures in conditions of several crises.
Delay

5. Do you meet the deadlines for the implementation of the activities set out in the project proposal?

Answer	Percentage	Number
Yes, completely.	36.4%	4
Yes, partially.	63.6%	7
	Total	11

6. Please explain why:

Answer
As we noted above Activity No. 7- "Reconstruction of water supply pipes from the dam Asenovets to WS Sliven" with Contract No. 17/28.02.2022, will not be completed until the end of 2023, due to a number of urbanization problems * There is a significant delay in the implementation of Activity No. 6 "Construction and reconstruction of the water supply and sewerage network and accompanying facilities in the quarter of Rechitsa" with concluded Contract No. 6/09.10.2020, due to the extremely difficult working conditions with high groundwater and frequent breakdowns of the old water pipes.

Due to problems of an administrative nature (e.g. incomplete procedures for obtaining the right of passage through public state-owned properties), which are beyond the Beneficiary's will and powers.

1. For administrative reasons; 2. Due to specific terrain conditions - a large percentage of hard-rock soils.

yes, partially

1. The consequences of the COVID-19 pandemic on the work of evaluation committees, incl. the preparation of the documentation for the award, as well as the extension of deadlines for receiving offers given the impact of the state of emergency; 2. Delay in the actual construction due to violation of the delivery schedules of materials necessary for the construction, communicated by each of the Contractors who started and performed the actual construction; 3. Complaints of participants in public procurement for the selection of project contractors; 4. The presence of inaccuracies in the conceptual investment projects for each of the objects and the need to process changes according to the order of the contracts. This significantly delays the development of the technical projects and affects the overall performance of the activity within the stipulated period; 5. A significant delay in issuing orders for the temporary organization and safety of traffic, caused by social dissatisfaction, difficulties in the organization of public transport, garbage collection, etc.; 6. The municipality's investment intentions, requiring joint execution of asphalt works to avoid double financing of the same activities with different sources of public resources;

Delay due to administrative burdens

There was a delay in procurement for Activity 8: Increasing the efficiency of the WSS operator. There is a delay in the implementation of the CAW at most sites. Lack of sufficient personnel and financial resources in the contractor companies.

7. Are there things that, if you were starting the planning and/or implementation of the project now, you would do differently? Please clarify which/what?

Answer

No (6 responses)

Yes, prior caution related to the regulatory procedures in connection with the implementation of regulation by the Municipality of Sliven and a change in the route of the water supply pipeline under Activity No. 7 - "Reconstruction of water supply pipelines from the dam Asenovets to WS Sliven" or solving the problem with the coinciding routes of the water pipeline and the electricity pipeline in advance.

Yes. Preliminary implementation of most administrative procedures.

Yes

Planning a larger reserve of time for the actual implementation of the construction and installation works on the project.

We would recommend that the contracts for the Engineering of the WSS networks be divided into a design contract and a CAW contract.

8. What are the main reasons for the difficulties you encounter/have encountered in achieving the project's goals? (Please indicate each answer that is correct for you).

Answer	Percentage	Number
Lack of sufficient financial resources to co-finance the activities.	45.5%	5
Difficulties and delays in implementation.	63.6%	7

High administrative burden OPE/bureaucratic procedures beyond the control of the beneficiary.	36.4%	4
Delays in obtaining necessary documents of an administrative nature (in fulfillment of registration, license or permit regimes).	63.6%	7
Difficulties in preparing tender documentation for contractor selection.	18.2%	2
Difficulties in the process of conducting contractor selection procedures.	9.1%	1
Appeal of the procedure(s) for the selection of the contractor(s).	72.7%	8
Lack of project management experience.	18.2%	2
The lack of sufficient human resources to manage the project.	9.1%	1
Delay/bad performance by contractors/subcontractors.	9.1%	1
Planning lapses.	9.1%	1
Changes in strategic and political priorities (please explain):	9.1%	1
Difficulties due to irregular cash receipts through OPE payments.	9.1%	1
Other (please specify):	9.1%	1

Other (please specify):	Number
Repeated conduct of procedures for subsequent control over the same procedures for the selection of public procurement contractors under the project and the imposition of repeated financial corrections at the end of the program period in amounts significantly exceeding the beneficiary's ability to provide a financial resource (even temporary until a decision of a competent court).	1

9. What activities organized by the MA to support project management and implementation have you participated in? (Please indicate each answer that is correct for you).

Answer	Percentage	Number
Trainings.	54.5%	6
Workshops.	45.5%	5
Information campaigns.	27.3%	3
Other (Meetings)	9.1%	1
We have not participated in such activities.	18.2%	2

10. Please rate the support you received/are receiving from the OPE Managing Authority in relation to the implementation of your project?

Answer	Percentage	Number
Sufficient and timely.	54.5%	6

Sufficient but untimely.	9.1%	1
Insufficient.	27.3%	3
I cannot decide.	9.1%	1
	Total	11

11. How would you rate the change in the administrative burden of implementing the project at the beginning of the project and now?

Answer	Percentage	Number
The administrative burden decreased slightly.	9.1%	1
Unchanged.	90.9%	10
	Total	11

12. Please explain why:

-

13. Do you have recommendations for improvements in the OPE implementation process and lightening of the administrative burden? Please specify:

Answer
No (7 responses)
We recommend to reconsider the procedure of additional agreements to the administrative contracts for non-compensated financial assistance, since currently the input information in the amendment request is duplicated (in the UMIS system and in the amendment request form), which creates an additional administrative burden and creates prerequisites for errors and inaccuracies when filling in the information.
Use in UMIS of documents uploaded in previous PODs as well.
More meetings between the parties are needed to clarify the issues and unify the positions.

14. How would you rate the benefits of the project compared to the burden of implementing the project?

Answer	Percentage	Number
The financial support provided on the project is without alternative for us and therefore very important.	54.5%	6
The project is useful, but also very difficult to implement.	45.5%	5
	Total	11

15. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
--------	------------	--------

Improved water supply.	100.0%	11
Reduced water losses.	90.9%	10
Better drinking water quality.	54.5%	6
Better connectivity for the population to sewage systems	63.6%	7
Achieving wastewater treatment requirements.	45.5%	5
Other (please specify):	18.2%	2

Other (please specify):
Reduction of infiltration in sewage networks.
Load of pollution, which is collected and treated in full accordance with the applicable legislation

16. If it were not for the financial support under OPE, would you have implemented the project?

Answer	Percentage	Number
No.	90.9%	10
Yes	0%	0
I cannot decide.	9.1%	1
	Total	11

17. Did you observe any unplanned effects of the project implementation?

Answer	Percentage	Number
Yes, negative, such as (please specify):	20.0%	2
Yes, positive, such as (please specify):	0%	0
No.	80.0%	8
	Total	10

Yes, negative, such as (please specify):
Need to secure additional/unplanned loan funds
The financial commitment of the WSS companies has grown much more than originally predicted, which puts them in an extremely difficult financial situation. The constant financial corrections make the financial situation of the WSS companies extremely difficult.

18. Did you use a loan for the implementation of the project?

Answer	Percentage	Number
--------	------------	--------

Yes.	100.0%	11
	Total	11

19. Source of funding: (Please indicate each correct answer for you).

Answer	Percentage	Number
W&S Holding.	40.0%	4
European Bank for Reconstruction and Development (EBRD).	40.0%	4
Other financial institution (please specify):	50.0%	5

Other financial institution (please specify):	Number
Not listed	1
Allianz Bank Bulgaria	1
UBB	1
FIB AD	1
Fund Flag	1

20. Please indicate the reason why you chose the specific funding source: (Please indicate each answer that is correct for you).

Answer	Percentage	Number
Burden of administrative documents for taking the loan.	20.0%	2
Interest rate level.	50.0%	5
Refund period.	70.0%	7
Other (please specify):	20.0%	2

Other (please specify):	Number
Level of penalty interest and other credit management fees	1
Due to the refusal of all other financial institutions to finance the WSS Company	1

21. Purpose of funding: (Please indicate each answer that is correct for you).

Answer	Percentage	Number
"Bridging" financing.	40.0%	4
Provision of funds for own contribution.	100.0%	10
To cover VAT on the project	60.0%	6

22. How important was the opportunity to use a loan in the form of a Financial Instrument under the program for the implementation of the project:

Answer	Percentage	Number
Very important, the project could not be implemented without a loan through FI from the program.	80.0%	8
Medium importance, the project is implemented with a loan from another source.	20.0%	2
	Total	10

23. In your opinion, do the results achieved with the implementation of the project sufficiently meet the needs in the sector at the moment?

Answer	Percentage	Number
Yes, the needs are fully met as a result of the project activities.	40.0%	4
No, the results meet the needs, but there is more to do (please clarify):	60.0%	6
	Total	10

No, the results meet the needs, but there is more to do (please clarify):
The project cannot cover the reconstruction of the entire outdated water supply network
The sector needs more investment to improve the water infrastructure
Very outdated infrastructure
Greater scope of investment intent
The sector needs constant funding to renew assets

24. Does the implementation of the activities financed under the OPE have an effect on the financial sustainability of the water and sanitation operator you represent?

Answer	Percentage	Number
No, there is no effect on financial sustainability.	30.0%	3
Yes, there is an effect on financial sustainability.	70.0%	7
	Total	10

25. Please specify:

Answer	Percentage	Number
Positive as a result of the reduced water losses.	42.9%	3
Negative as a result of the loan withdrawal.	57.1%	4
	Total	7

26. Please indicate how you would estimate the net effect of project implementation on the financial sustainability of the water utility operator:

Answer	Percentage	Number
Positive (the benefits of reduced water losses outweigh the costs of the loan).	42.9%	3
Negative (the project's own contribution exceeds the benefits of reduced water losses).	57.1%	4
	Total	7

27. Are funds needed and available for operational costs and to support the project's achievements?

Answer	Percentage	Number
Yes, they are needed and we have the funds to cover all costs.	40.0%	4
Yes, they are needed and we have funds to cover part of the costs.	10.0%	1
Yes, they are needed, but we don't have them and we don't have clarity on how we will provide funds to support the project's achievements.	30.0%	3
No funds are required to sustain the project's achievements.	10.0%	1
Other (please specify): no answer specified	10.0%	1
	Total	10

28. What are the sources of funds for sustaining the achievements of the project? (Please indicate each answer that is correct for you.)

Answer	Percentage	Number
Other (please specify):	100.0%	5

Other (please specify):
Proceeds from fees for the use of WSS services
Own funds
Own funds - revenues generated from the provision of water and sanitation services
Own revenues of WSS company
Business

29. Do you plan in the future upgrading or other measures related to the realized benefits of the implementation of your project?

Answer	Percentage	Number
We do not yet have clarity on the need for future complementary measures.	80.0%	8

We are not planning future measures because we do not know where to secure funding from.	20.0%	2
	Total	10

30. Please briefly indicate which:

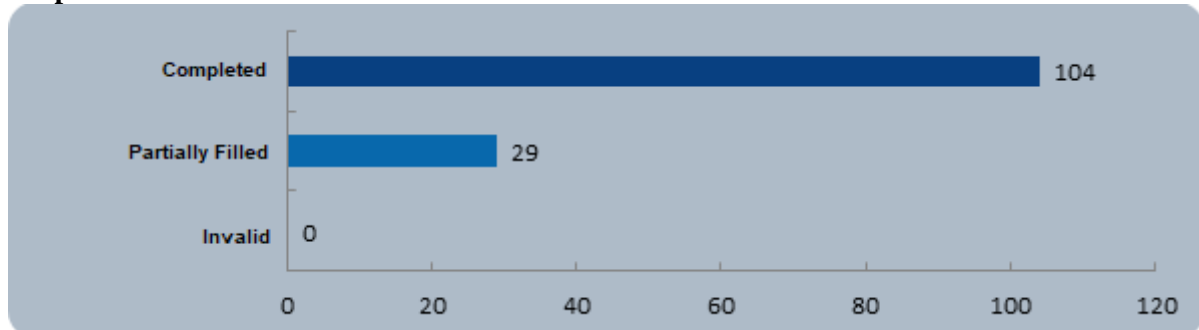
-

31. You have reached the end of the survey. Thank you for participating! If there is anything else you would like to share about the OPE 2014-2020, please do so below:

Answer
None
Thanks for your support!
I apologize for the delay in completing the survey. I hope it's still useful for you!

SURVEY AMONG MUNICIPALITIES, BENEFICIARIES UNDER THE 2014-2020 OPE

Response statistics



	Number	Percentage
Completed	104	78.2
Partially filled	29	21.8
Invalid	0	0
Total	133	

1. Please note under which priority axis of the OPE 2014-2020 your project is financed

Answer	Percentage	Number
PA1 Waters	9.8%	13
PA2 Waste	63.6%	84
PA3 Natura 2000 and Biodiversity	5.3%	7
PA4 Flood and landslide risk prevention and management	3.0%	4
PA5 Air	18.2%	24
	Total	132

2. Please mark the procedure under which you are a beneficiary (Please indicate each correct answer for you):

Answer	Percentage	Number
2.002 Combined procedure for design and construction of composting installations and installations for preliminary treatment of household waste.	11.9%	10
2.004 Design and construction of anaerobic installations for separately collected biodegradable waste.	2.4%	2
2.005 Design and construction of composting installations for separately collected green and/or biodegradable waste.	13.1%	11

2.006 Second combined procedure for the design and construction of composting installations and installations for the preliminary treatment of household waste.	2.4%	2
2.007 Completion of the project "Implementation of a decentralized model for bio-waste management in one of the waste management regions in Bulgaria, including construction of the necessary technical infrastructure - a system for separate collection and a facility for recycling the collected bio-waste".	0.0%	0
2.009 Implementation of demonstration projects in the field of waste management.	27.4%	23
2.010 Reclamation of landfills for closure subject to EU infringement proceedings in case C-145/14.	46.4%	39

3. Please mark the procedure under which you are a beneficiary (Please indicate each correct answer for you):

Answer	Percentage	Number
1.005 Second phase of projects for the construction of water and sanitation infrastructure, the implementation of which has started under the 2007-2013 OPE.	46.2%	6
1.006 Implementation of early WSS projects	30.8%	4
1.009 Implementation of early water and sanitation projects - component 2	15.4%	2
1.020 Construction of WSS infrastructure in the Sofia Municipality	7.7%	1

4. Please mark the procedure under which you are a beneficiary (Please indicate each correct answer for you):

Answer	Percentage	Number
5.002 Development/Update of municipal atmospheric air quality programs	37.5%	9
5.003 Measures to improve atmospheric air quality	50.0%	12
5.004 Measures to address transportation as a source of air pollution	29.2%	7
5.005 Development/Update of municipal programs for ambient air quality - 2	0.0%	0

5. Please mark the procedure under which you are a beneficiary (Please indicate each correct answer for you):

Answer	Percentage	Number
4.003 Prevention and counteraction of landslide processes to limit their risk (including along the republican road network)	75.0%	3
4. 004 Measures to introduce solutions for flood risk prevention and management	25.0%	1

6. Please mark the procedure under which you are a beneficiary (Please indicate each correct answer for you):

Answer	Percentage	Number
3.027 Measures for Improving the Conservation State of Birds	14.3%	1

3.019 Shared Vision for the Ecological Network Natura 2000 in Bulgaria	14.3%	1
3.031 Shared Vision for the Ecological Network Natura 2000 in Bulgaria	42.9%	3
3.017 LAG SAMOKOV Improvement of the nature protection status of species from the Natura 2000 network through the CLLD approach on the territory of LAG Samokov	14.3%	1
3.029 LAG Tutrakan-Slivo pole, Measure 109 OPE "Improving the nature protection status of species from the Natura 2000 network through the CLLD approach"	14.3%	1

7. Please note the status of your project:

Answer	Percentage	Number
In execution.	33.6%	44
Finished.	65.6%	86
Temporarily suspended.	0.8%	1
	Total	131

8. What are the expectations regarding the implementation of your project by the end of 2023?

Answer	Percentage	Number
The project will fully achieve (has achieved) its objectives.	93.3%	112
The project will partially achieve (has achieved) its objectives.	6.7%	8
The project will not achieve (has not achieved) its objectives.	0.0%	0
I cannot decide.	0.0%	0
	Total	120

9. What are the main reasons for the difficulties you encounter/have encountered in achieving the project's goals? (Please indicate each answer that is correct for you).

Answer	Percentage	Number
The set goals were/are not realistic.	3.4%	4
Lack of sufficient financial resources to co-finance the activities.	10.1%	12
Difficulties and delays in implementation.	17.6%	21
High administrative burden OPE/bureaucratic procedures beyond the control of the beneficiary.	8.4%	10
Delays in obtaining necessary documents of an administrative nature (in fulfillment of registration, license or permit regimes).	8.4%	10
Difficulties in preparing tender documentation for contractor selection.	6.7%	8
Difficulties in the process of conducting contractor selection procedures.	18.5%	22

Appeal of the procedure(s) for the selection of the contractor(s).	21.8%	26
Problems with public procurement.	0.0%	0
Lack of project management experience.	1.7%	2
The lack of sufficient human resources to manage the project.	8.4%	10
Delay/bad performance by contractors/subcontractors.	5.0%	6
Relationships with partners.	4.2%	5
Planning lapses.	3.4%	4
Ambiguities regarding the future use of the project proceeds.	1.7%	2
To understand and/or fulfill the requirements of the OPE MA.	4.2%	5
Difficulties due to irregular cash receipts through OPE payments.	0.8%	1
To report progress in the technical reports submitted during UMIS2020.	2.5%	3
To report the implementation of project indicators.	3.4%	4
To prepare the documents for verification of expenses.	4.2%	5
Other (please specify):	6.7%	8
We had no difficulties.	39.5%	47

Other (please specify):
The significant increase in the prices of energy carriers, such as natural gas and solid fuels, incl. pellets, led to a significantly greater interest of applicants in electrical appliances (air conditioners), which in turn necessitated a redistribution of the quantities of appliances of each type and the need to carry out an additional procedure for the delivery of air conditioners.)
Covid
Lack of flexibility on the part of the MA in applying the requirements of the Program and literalism in interpreting the concluded contracts under the PPA. Inability to correct an evident factual error without financial impact.
Work and interaction with the population. Clash with the mentality and external point of control (everything depends on someone else). The use of extremely complex psychological techniques to influence the population, and the results appear slowly over time.
Sanctions due to public procurement procedures.
Prices of materials and equipment and unwillingness to participate in some of the orders
Lack of consumer interest
Financial sanctions

10. Please indicate the main achievements of your project to date:

Answer

We have introduced the system for taking back PET and CANS packaging waste. We introduced access to household waste receptacles with personal identification.

Completed CAW activities. Commissioning to come. Registration of a Municipal Commercial Company is pending.

more than 9,000 applications submitted, nearly 8,000 contracts concluded, more than 8,000 new devices delivered

After the completion of the CAW activities for the site, the following were prepared: Declaratory Act for establishing the suitability for the acceptance of construction (Annex No. 15 to Art. 7, Para. 3, Item 15 of Ordinance No. 3 of 31.07.2003 on drawing up acts and protocols during construction) dated 16.11.2021 and Commissioning Certificate No. 14/23.11.2021, from the head architect of the Municipality. The acceptance of the complete performance under the contract is certified by the signing of the Acceptance and Handover Protocol for the work performed. Based on the overall correct implementation of the activity the city of Beloslav has implemented an underground system for separate collection of recyclable household waste materials. During the reporting period, the horizontal principles of the EU were respected. Results: - Improving the management of recyclable household waste, including paper, cardboard, plastic, glass and metal in Beloslav municipality; - Increasing public self-awareness for compliance with the relevant highest level of the household waste management hierarchy; - 11 sites with 3 containers each were built for the separate collection of paper, cardboard, plastic, glass and metal from the population; - Built underground system for separate collection of household waste materials. The performance of the activity leads directly to the performance of the following indicators laid down in the procedure: - Realized demonstration projects; - Quantity of household waste that has been prevented, separately collected and/or recycled or prepared for reuse as a result of the implementation of the project.

Closed and reclaimed existing municipal solid waste landfill. Project indicators achieved. Verified funds from GA in the amount of 98.49%

Reclaimed 14 acres of waste-contaminated areas and prevented permanent pollution of a national road.

Reclamation of an area of 9,000 decares

A composting plant for green waste was built and put into operation.

Regardless of the difficulties mentioned above and the exhausting work of the team regarding the confrontation with mindsets, misunderstanding, skepticism and continuous persuasion, the regular meetings we hold with the population contribute not only to the achievement of the set indicators in the project, but also in general complement the literacy and knowledge, the understanding of the population about the entire process of waste management. With the project, the created conditions for effective implementation of the environmental policy in the field of waste on the territory of our municipality and compliance with the hierarchy in waste management are upgraded.

Reclaimed landfill.

Completed technical reclamation of a landfill for solid household waste.

Update of the municipal program to reduce pollution with FPM10 and surfactants and reach the established standards for harmful substances in the atmospheric air in the municipality of Haskovo, by planning measures adequate to the local conditions] 2. Renewal of the rolling stock (five new electric buses). Through them, a faster, more efficient and more environmentally friendly urban transport is carried out, which attracts citizens and visitors to prefer it to the use of their private cars, which in turn will contribute to a further reduction in the amount of emitted FPM and nitrogen oxides in the urban environment.

Promotion of ecological network NATURA 2000 among

Technical reclamation of a landfill for household waste was carried out

Completed technical reclamation of Belogradchik municipal landfill with 8,399 sq.m. reclaimed area

Developed and commissioned: Pilot demonstration model for circular economy 16 information materials published: Achieved over: • 600,000 advertising impressions. • 300,000 ads reached. • 200,000 users through social platforms. • 70,000 views of the project videos on YouTube. • 40,000 users have viewed the uploaded materials on the project page. • 15,000 visitors to the website. Trademark registration

Renewed fleet of the municipal carrier with 56 electric vehicles Percentage of emissions FPM10 saved under the project 3.93 t/year

After the completion of the project, the Municipality of Kardzhali has an adopted and updated Program for the AAQ. This program is a major strategic document.

At the moment, the implementation is early and no achievements are observed.

Good organization for the implementation of project management; accumulated experience in the preparation of tender documents; experience in working with citizens.

Completely reclaimed terrain; reduced pollution

We have built a composting plant, and this is very well received by the citizens of the municipality of Belovo, the waste landfill has been recultivated, which also has a very big ecological effect.

Project activities

Reclaimed landfill for solid household waste.

Finished deliveries. Completed CAW above 70%

An analysis of good practices was carried out. An environmental center has been created to implement the activities. Conducted home composting training for target groups.

Completed stage of technical reclamation of the municipal solid waste landfill in the city of Pavlikeni. Biological reclamation activities are currently being carried out. The former depot with an area of over 40 acres is being transformed into a clean, green and welcoming place.

The technical reclamation of the landfill has been successfully completed and the project objectives have been achieved.

The project was successfully finalized and achieved its goals.

Selected contractors for all activities planned in the project; • Timely implementation of the planned activities.

Our company "Stolichen Elektrotransport" EAD implements 2 projects for the supply of vehicles for urban transport together with the Sofia Municipality. The first is for the delivery of trams, the second - for trolleybuses and electric buses. The second project includes CAW for the construction/reconstruction of 4 traffic lights and the reconstruction and modernization of 3 traffic lights, necessary for the trouble-free movement of the new vehicles. To date, 20 trams, 30 trolleybuses and 30 electric buses have been delivered, financed with the funds of OPE 2014-2020. The CTS and 1 RS have been successfully completed.

Environmentally friendly public transport is provided.

Built and put into operation a composting plant for separately collected bio-waste. * Built and put into operation installation for preliminary treatment of household waste. * The goals set by the Waste Management Act and the Ordinance on Separate Collection of Bio-Waste and Treatment of Biodegradable Waste have been met. * Delivered the necessary equipment and facilities for the separate collection of

green and biodegradable household waste and specialized transport equipment. * Delivered equipment necessary for the operation of the pre-treatment plant

A functioning WWTP, over 22,000 people live in a cleaner environment, a more attractive city for investment, reduction of pollution from a river flowing into the Black Sea.

The objectives of the project have been fully achieved.

Project implementation activities are carried out according to plan.

Contracts concluded with selected contractors.

Achieving and reducing the amount of landfilled municipal waste by providing additional capacity for pre-treatment of mixed municipal waste and recycling through composting of green and/or biodegradable waste. Contribution to the fulfillment of the obligations of the Republic of Bulgaria under a procedure for violation of EU law in connection with the decision of the Court of the European Union of 16.07.2015 in case C-145/14.

The aim of the project was to contribute to the achievement of the goals laid down in the Waste Management Act by introducing measures to prevent the generation of household waste and reduce the amount of mixed household waste generated.

Procedures have been prepared for the selection of the CAW contractor and the delivery of equipment

1. Delivered 9 trolleybuses with a length of 12 (+/-1) meters; 2. Delivered 13 e-buses with a length of 12 (+/-1) meters; 3. Delivered 13 charging stations for slow charging for electric buses; 4. 1 quick charge station delivered. 5. Collision avoidance systems implemented. 6. Delivered specialized equipment with a work platform to optimize the operation of the newly acquired vehicles

Two installations were built, equipped and put into operation - for preliminary treatment of household waste and composting of green waste. The installations have been operating for two and a half years, the amount of landfilled waste has been reduced, recyclable waste is separated and the same is sent for further processing.

The negative impact of the deposited waste on the components of the environment - air, soil and underground water - was stopped. After the technical recultivation, the terrain of the site acquired a welcoming appearance that matches the surrounding landscape.

An information campaign was carried out with very wide media coverage, informational materials were developed, which until now ensure the sustainability of the project and which can be used in the future. I believe that the project of the Municipality of Smolyan is successful and can be successfully upgraded in the next program period.

Realized sewage network.

Built and operating WWTP, rehabilitated part of the sewage network

We managed to reach a wide range of stakeholders who wanted to participate and utilize the biodegradable waste they generate in a rational way

Built plant for composting green and biodegradable waste for the Vratsa RWMA with a capacity of up to 8,000 t/year; Equipment supplied for the composting plant; Implemented publicity and visualization measures; Delivered mobile equipment for the construction of a composting plant; Delivered equipment, facilities and machines for separate collection of green and biodegradable waste from the population.

Reducing the amount of waste deposited at a regional landfill

Creating conditions for the implementation of good practices for the prevention and reduction of mixed household waste.

Reclaimed landfill. Liquidation of a long-standing landfill. Remodeled and beautified terrain (11).

The project proposal fully achieved the set goals at the stage of technical and biological landfill reclamation. Contamination of the soil and groundwater around the landfill and in the ravine has been stopped. The body of the landfill was strengthened and sealed, after which a monitoring system was built.

The project has fully achieved its goal of wastewater treatment.

A municipal program for improving the quality of atmospheric air has been prepared.

The reconstruction and modernization of the WWTP - Golden Sands led to the fulfillment at all times of the requirements of the permit for the use of a water body.

At the moment, we are achieving all the set indicators, having collected more applications for participation than we are able to finance.

Completed targets and indicators (8)

A successfully completed project that was important to the municipality (2)

Rehabilitation of a dam wall and related facilities

Delivered mobile equipment necessary for the functioning of the installations. Built: composting hall, pre-treatment hall, stabilization hall, warehouses, garages, administrative - domestic building.

More than half of the planned vehicles have been delivered, which is an indicator of implementation.

We were able to explain how useful it is to process green waste and not turn it into household waste.

Activities have started to organize information pools in 10 municipal schools with the aim of providing accessible and up-to-date information for students. Studies have been conducted on the campaigns carried out in the respective schools on the topics related to waste and environmental protection with a view to avoiding double funding by avoiding the provision of information and topics with which students are already familiar. Composters have been delivered to schools.

Completed project with introduced measures to reduce the generated waste, placed containers for collecting waste from clothing.

Increased awareness of environmental protection

1. Reconstructed WWTP 2. Stage I - constructed and reconstructed water and sewage systems 3. Stage II - constructed and reconstructed water and sewage systems 4. Stage III - constructed supply water supply

Built installations for pre-treatment and composting.

Reduction of the negative impact on the components of the environment - soils, atmospheric air, surface and underground waters; • Elimination of the risks arising from the movement and spread of tar pollution in the body of the landfill and outside it; formation of infiltrate; •improving the landscape and ecological balance in the area of the landfill. • Reduction of risks to human health;

Complete replacement of public transport with fully electric. Repair and rehabilitation of the street network and spaces between residential buildings. Achieving FPM10 levels.

Protection of the waste body of the landfill from the penetration of surface water; Protection of surface and underground water and atmospheric air from pollution; Creating a landscape similar to the surrounding space.

All project indicators have been achieved, project goals have been achieved. The main goal of the project proposal has been achieved - to contribute to closing the procedure for violation of EU law in connection

with the decision of the Court of the European Union of July 16, 2015 in case C-145/14 for non-fulfillment of obligations by the Republic Bulgaria of Article 14, letters a-c of Council Directive 1999/31/EC of April 26, 1999 on waste disposal.; Approved by the mayor of the municipality of Batak, protocol of a commission for the acceptance of technical reclamation, according to chapter four, art. 23, para. 1, item 1 of the Regulations for the Implementation of the Law on the Protection of Agricultural Lands (PPZOZZZ) and Section V of Ordinance No. 26 of 02.10.1996 on reclamation of disturbed land, improvement of low-productivity land, removal and utilization of the humus layer (Ordinance No. 26/1996) and issued Act - Model No. 15 according to Ordinance No. 3 of July 31, 2003 for drawing up acts and protocols during construction. The site is put into operation.

Achieved results: - Delivery and installation of new alternative heating devices - 2804 pcs. - Number of households with replaced heating appliances – 1962. In percentage terms - 49%.

Currently, 20 units have been purchased, delivered and put into operation. electric buses of the SOR brand, 4 fast and 20 slow charging stations. On 20.01.2023, a contract was concluded for the supply of 15 trolleybuses.

Completed construction and assembly works according to the types and quantities indicated in the accounts for the investment project, and quality in accordance with the current regulations, the approved investment project and the instructions of the persons who exercise supervisory services of the construction. Completed technical reclamation of a waste dump, located on the land of the city of Kavarna (regulated plot 35064.50.175).

Two green classrooms have been equipped in order to create conditions and methodology for introducing a Demonstration Education Program in the two pilot schools in municipality of Etropole: "Hristo Botev" Primary School and "Hristo Yassenov" Secondary School. The schoolyards are equipped with demonstration composting systems and the involvement of students, teachers and parents in various activities related to the prevention of the generation of solid household waste. Composting containers have been provided to 200 households in the territory of the villages in the municipality of Etropole, in order to introduce and implement the Home Composting Program.

With the realization of the main activities of the project, the expected result of the implementation of the project was also achieved, namely: the awareness of the population about the conservation of protected species and especially orchids in the area during animal grazing has increased; preconditions for the development of environmentally sensitive farming were created; community self-awareness was built for the conservation of protected species; The opportunities offered by NATURA 2000 in the region for the residents and guests of the region were popularized.

Commissioned and functioning WWTP and WSS infrastructure.

Composting containers distributed to the population according to a pre-composed list of those who wish. Conducted an information campaign to explain the composting process and the way to use the containers.

- Fortified landslide in Boruna quarter, Lom city, by building a retaining wall, according to the "Constructive" part of the investment project; - Lowered level of underground water, by building drainage ribs and drainage shafts with horizontal drilling drainage /HDD/, according to the "Technological" part of the investment project;

To date, 2,929 air conditioners have been installed in the residential properties of 1,165 final recipients. The replacement of old stoves with pellet heating devices is currently being carried out and the replacement of old stoves with gas heating devices is to come.

We have reduced the amount of landfilled waste. We produce excellent quality compost.

Built and functioning composting plant.

Fortified landslide and reduced disaster risk.

Delivered ecological electric vehicles to public transport – 33 units; Electric vehicles included in the implementation of the transport scheme of Stara Zagora Municipality - 18 electric buses; Delivered, installed and put into operation 18 double charging stations for the electric buses; Upgrade of Integrated Urban Transport, financed under OPRD 2007-2013, OPRD 2014-2020 and OPE 2007-2013; Improving the level of quality and security of public transport services in Stara Zagora Municipality; Expansion of the current public transport system in the city of Stara Zagora by introducing ecological and safe public transport.

Successful implementation of the Contract for the assignment of SGEI for the preliminary treatment of household waste and operation of the installation for preliminary treatment of household waste, and composting of separately collected biodegradable and/or green waste and operation of the composting installation.

Separation of biodegradable waste from the percentage amount of mixed household waste and this allowed us to compost it on the territory of Krivodol municipality. The locations for the necessary elements of the system for the separate collection of waste and their delivery for composting or anaerobic digestion have been determined. Bio-waste from maintenance of public areas, parks and gardens is collected separately. Bio-waste, as well as waste from green areas to commercial establishments, production, economic and administrative buildings are treated by composting or anaerobic digestion, in a way that ensures a high degree of environmental protection.

1. The contracts for the supply of vehicles (trolley buses and electric buses) and charging stations have been concluded. We are waiting for the delivery in 2-3 months. 2. The trolleybus network and rectifier stations have been repaired.

Prepared and adopted program for AAQ. Achieved 100% electric transport, high quality public passenger transport service, significantly reduced harmful emissions, including FPM10.

Additional number of residents with access to improved wastewater treatment - 131,154 Additional number of residents with access to improved water supply - 12,955 Reconstructed general WWTP for a group of settlements from the municipalities of Pleven and Dolna Mitropolia Reduced physical water losses - 12.37% Load on pollution, which is collected and treated in full compliance with the applicable legislation - 131,154.00

Awareness among the population about the Natura network

The following project activities were successfully completed: -under Activity No. 3: Building capacity for rescue actions of distressed birds through infrastructural measures - a center for temporary accommodation and first aid for injured and harmed red-breasted geese and their rehabilitation was established; -under Activity No. 4: Involvement of the general public in the conservation of the red-breasted goose - promotion of the species and its conservation, through the printing and distribution of printed materials - the teaching aid "With the Red-breasted Goose at School and in Nature" and the "Hunter's Handbook" were edited, updated, printed and distributed, and the same were presented to schools and hunting-fishing societies, respectively.

Achieved Percentage 7 out of 10 indicators related to FPM 10.

Built composting plant, processed green waste, reduced percentage of waste in the Municipality.

95% implementation on the part of our municipality.

Main results of the project so far: Number of applications received for replacement of heating devices - 2,042 units. Number of approved applications/households - 1,578. Number of concluded contracts for replacement of heating devices - 750 for air conditioners and 80 for gas appliances Number of replaced appliances: Air conditioners: - Air conditioner 12,000 BTU (3.5 kW) or equivalent - Inverter wall air conditioner, "split system", with remote control - TREO CS-I12MF3/ CO-I12MF3 - 701 pcs. - Air conditioner 14,000 BTU (4 kW) or equivalent - Inverter wall air conditioner, "split system", with remote control. - TREO CS-I18MF3/CO-I18MF3 – 136 pcs. - Percentage of households with replaced electric

heating devices – 450 units. Gas appliances: - Two-circuit natural gas condensing boiler up to 24 kW or equivalent - 25 pcs.; - Two-circuit natural gas condensing boiler up to 35 kW or equivalent - 1 pc.; - Steel panel radiator (500x1200) ± 20% or equivalent – 13 pcs. - Steel panel radiator (500x1800) ± 20% or equivalent – 30 pcs. - Percentage of households with replaced gas heating devices – 26 pcs.

Built and commissioned plant for composting separately collected green and/or biodegradable household waste

On the territory of the municipality, Percent 8 composters were placed in public green areas - 2 pcs. in the city Topolovgrad and one each in the villages of Radovets, Ustrem, Srem, Sinapovo, Oreshnik and Orlov dol. Each of them has a volume of 1800 l. Biodegradable waste obtained during the maintenance of green areas in populated areas is placed in the composters. In addition, and if necessary, composters are also used to reduce the amount of household biodegradable waste separately disposed of in the brown bins located in public places. This circumstance is extremely useful for reducing biodegradable waste on the territory of the Topolovgrad municipality. Composting trainings and campaigns have left a lasting impact among young children and students. They learned about the environmental benefits of using biomass waste. They received basic knowledge and skills about composting. The huge amounts of green waste found their place. The equipment purchased under the project is extremely useful, is used daily and meets the needs of the municipal administration.

Introduced home composting in populated areas of Kaloyanovo municipality, by deploying personal composters for biodegradable household waste with code 20 02 01 Biodegradable garden and park waste and code 20 01 08 Biodegradable waste from kitchens and catering establishments. - delivered and made available for use by 400 households of 400 home composters with a volume of 1000 liters and 400 shredders for branches - introduced home composting in 400 households from Kaloyanovo municipality

11. Are there things that, if you were starting the planning and/or implementation of the project now, you would do differently? Please clarify which/what?

Answer

There is an opportunity for more successful implementation of some of the measures, but the ones included in the project are also positive for the local community!

Delivery of site equipment.

Yes, the replacement of old stoves will not be organized through the municipalities

No (76 responses)

Yes. The installation of the fences for the outdoor composters for public composting to be outsourced. In addition to the planned trainings, the informational meetings to involve users and clarify the benefits of composting should also be assigned to an external contractor, with a social psychologist in his team.

Very careful selection of the design team.

Yes, conduct the tender procedure

Yes, but with the restrictions laid down in the terms of the relevant procedure, we are obliged to comply with the requirements thus set and we do not have much freedom in planning and subsequently in the implementation of the project.

The communication channels used in the dissemination of project results.

In future planning, we would allow more time for reconciliation procedures.

Yes: -larger team; - planning activities so as to minimize the use of paper; - inclusion of activity (if applicable and permissible) to create software for the preparation and management of certain documents that are generated in large numbers.

Yes, we will plan the investment intention more carefully, given the experience we already have

In the contracts with the construction contractor, only the minimally necessary documents for acceptance of the work should be required according to the legislation.

Better management of deadlines in terms of coordination procedures of the investment project, shorter terms in the selection of contractors and the longest possible term for CAW and commissioning.

We had some chaos in the chronology of activities in the preparation of the project proposal. We could have avoided it.

We would invest more time in issuing the necessary CAW permits.

I would necessarily include in the scope of the project the reconstruction of the existing city canal network. In our case, this was dropped after the conceptual phase, necessitating the construction of two huge rain traps.

We would plan the construction works with more modern technologies and materials.

We would cover more people from all populated areas.

Launching of all public procurements under condition, before signing of the GA

Due to the longtime of preparation of the project proposal and evaluation of the project before the conclusion of the Grant Agreement, the previously prepared technical project turned out to be irrelevant to the existing situation. This circumstance led to the emergence of unforeseen circumstances and necessitated additional expenses. A good option is to assign the activity as engineering. The approved amount of the grant was not tailored to the specific conditions of our project and was insufficient to finance the project.

We would have planned an even wider campaign, which would however require a longer period than 1 year.

Yes, more infrastructure.

We would include rehabilitation of the city's entire sewer network

We would plan to purchase a larger composter for home composting due to overwhelming interest from the residents of the municipality

Planning more equipment, facilities and machines for separate collection of green and biodegradable waste from the population. Planning more measures to inform and work with the population, after the start of the operation of the installation, in order to support the bilateral process.

Public procurement procedures. For project management, external persons/companies should not be used for management.

More people are necessarily needed in the implementation of such a project. It is purely logistically difficult. We would create a larger team to manage and implement the project.

We will probably set smaller targets for household waste saved.

Perhaps, we would place more containers for clothing waste.

The management team to be provided by the GA

The project of the municipality was carried out according to the requirements of the MA OPE. We would carry out the restoration of the pavements after the excavation activities in a different way, more specifically - we would place in the project implementation the restoration of the pavements to be in the scope of the entire width of the roadway, and not only in the trench.

The installations themselves

We would choose a longer period for conducting tender procedures.

To provide for the delivery of a larger number of the previously requested composters /about 10%/ . More information events and funds for campaigns to promote the project and the composting process, the effect on the environment, etc..

To change the project implementation scheme: The municipality should make a ranking of the applicants according to certain criteria, provide vouchers for the purchase and installation of the devices, as well as be obliged to hand over the old devices. The municipality should carry out the implementation of the entire project.

Timely launch of public awareness activities on separate waste collection, and green waste in particular.

Yes! We would choose different type vehicles as technical specifications.

Better prepared and executed public procurements.

It is complete madness to announce an engineering order with a detailed BoQ. At the stage of approval of the project by the OPE MA, it was approved with a detailed BoQ as a result of the implementation of the previous project during the program period 2007 - 2013. During the preparation of the documentation for the assignment of engineering, in all the conversations we had with the OPE MA, we were instructed to strictly adhere to the detailed BoQ approved at the candidacy stage. Exactly this has led to difficulties in the evaluation and reporting of the execution of the engineering contract, because it is madness to offer engineering of conceptual design with a detailed BoQ

12. What activities organized by the MA to support project management and implementation have you participated in? (Please indicate each correct answer for you)

Response ID	Percentage	Number
Trainings.	41.0%	48
Workshops.	7.7%	9
Information campaigns.	25.6%	30
We have not participated in such activities.	32.5%	38
Other	9.4%	11
Don't know	2.6%	3

Other	Number
Business meetings	9
Remote learning through provided materials	1
Information day	1

Total	11
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13. Please rate the support you received/are receiving from the OPE Managing Authority in relation to the implementation of your project?

Response ID	Percentage	Number
Sufficient and timely.	88.0%	103
Sufficient but untimely.	3.4%	4
Insufficient.	3.4%	4
I cannot decide.	5.1%	6
	Total	117

14. How would you rate the change in the administrative burden of implementing the project at the beginning of the project and now?

Response ID	Percentage	Number
The administrative burden increased.	7.7%	9
The administrative burden decreased slightly.	13.7%	16
The administrative burden decreased significantly.	10.3%	12
Unchanged.	68.4%	80
	Total	117

15. Please explain why:

Answer
Because there are many bureaucratic procedures
During the entire period, we did not understand that there was an administrative burden. Everything was reported in UMIS. What weighs are the explicit procedures that must be worked out and the capacity that must be proven, although we have been successfully implementing OPE projects for two program periods already.
The reporting of the project through UMIS leads to a reduction of the administrative burden.
The attempt of the representatives of the MA to maximally support the process of implementation and solve the problems as quickly as possible, in order to achieve the results of the project, which have not only local, but national significance. It is important to realize that the municipalities are partners of the state in the achievement of national policies, a continuation of the European ones, and not institutions whose main purpose of functioning is to defraud the MA and hence the EU funds. Nevertheless, financial corrections were not missing, but in truth they were at the sanitary minimum.
Increase in the volume of documentation when reporting the project

Due to the introduction of a flat rate for management and publicity costs and the corresponding elimination of the need to introduce cost justification documents for them. For subsequent control of the OP, it is not necessary to enter the documents publicly announced in the public procurement register.

Introduction of new requirements and new instructions, ambiguities regarding the application of indexation of CAW contracts.

Because we have completed all the activities on the project and have successfully completed it.

Fully electronic reporting, very good communication with technical and financial expert, clear instructions

Mainly because of the good communication through UMIS

The obligation to determine an estimated value based on market research or market consultation in conditions of rapidly growing inflation takes a lot of time for the procedure team.

Difficulty in reporting and excessive paperwork to scan.

Unnecessarily large volume of documentation, forms,...

In the case of phased projects, there were no remunerations for the project teams, for this reason the municipal employees were involved in project administration - in this way, they had the greatest burden in the implementation and reporting of the project.

UMIS and the work and way of reporting in this system facilitate

Many reports and explanations.

The development of the UMIS 2020 system, which successfully collects, systematizes and processes data, helps the rapid exchange of information. Event traceability is available.

We have good coordination with the MA team!

Due to the approaching deadline for the implementation of project activities

16. Do you have recommendations for improvements in the OPE implementation process and lightening of the administrative burden? Please specify:

Answer
I cannot decide (3)
No (79)
The UMIS system has led to a significant facilitation of project reporting. It will be useful for the MA to foresee not only a final on-site inspection, but also at least one intermediate one for activities involving construction. The 2% of unverified project costs were actually incurred, but "unproven" by documents according to the MA. If there is a case involving the need for an on-site assessment, it is good to provide for such an opportunity for additional visits. In order to ease the administrative burden, it is good not to require the Beneficiary to re-upload documents when re-requesting expenses for which the same are available in the system, be it in a previous package of reporting documents.
The OPE MA has always reacted in a timely manner and has not burdened with additional requirements in the process of managing and implementing the activities. However, if the requirement for the preparation of additional procedures and the requirements for participation in trainings could be dropped, it would be a mitigating condition in the implementation of the administrative GA.

Yes. Let the MA, since they can afford to engage companies to monitor for discriminatory conditions in the OPs of their beneficiaries, hire such to prepare blank tender documentation (in this particular case for reclamation CAWs) and the beneficiaries to use them, minimizing the risks of subjectivity and violation of the rules for transparent and equal awarding of public funds to performers of activities, in the case of CAW. And if, despite this, any auditing or control body finds discriminatory conditions in the TD template provided for use, the responsibility should be borne by the legal team hired by the MA and the MOEW, and not by the user of the TD template, such as the municipalities.

It would be good for the beneficiaries to be aware in advance of all types of documents that will be required for verification

I remember we waited more than 2 months for one verification because of a few cents difference (4 cents as I recall) resulting from rounding in Excel. It wasn't serious.

To ease the procedures for verification of expenses.

My recommendation is that the employees of the OPE MA should continue to be responsive professionals.

Written inquiry and receipt in written form of direct instructions from the MOEW, in the event of a need arising in a specific case.

The obligation to provide the same documents in all reports is an additional difficulty.

Holding interim meetings between the PMU and the OPE team responsible for the project.

Our recommendation is to introduce prior control of public procurement.

The required evidence for the implementation of part of the activities - for example, volume of excavations and embankments should be simplified by using modern methods and software programs for design.

Attaching documents that are visible in other systems.

Introduction of simplified reporting (3)

Minimization of formal requirements.

To consider reducing and simplifying the required documents when submitting payment requests. We mean they can be rounded up.

to have prior coordination of the procedures in accordance with the PPA

OPE, since it doesn't help, it shouldn't get in the way.

The burden is not great.

Introduction of a uniform rate for human resources and elimination of reporting documents for them

Increased control by the MA regarding tender procedures, in order to promptly prevent the subsequent imposition of financial corrections.

I have no recommendations. The coordinating team of the project, on the part of OPE, provided full assistance in the implementation of the project. They were always available for any questions and competently assisted the PMU in the implementation of the project.

The procedures for selecting a contractor and concluded contracts are publicly available documents on the relevant profile of the Contracting Authority in CAIS, attaching these files to UMIS as separate

documents further complicates the work of the team. One click is enough to access the required documents that are visible to the general public.
Reduction of document turnover.
We don't have any for this team!
The administrative burden probably decreased for the OPE MA but not for the beneficiary, that is, the measures taken to reduce the administrative burden are to relieve the MA.
no, the experts I have contacted during the implementation of the project are professionals, responsible and qualified, each in his field, open and responsive, providing help and support.
Setting a response deadline set by the MA beneficiaries. More specifics when receiving an answer from the MA for questions that have arisen regarding the implementation of the projects.
No. We worked in an excellent partnership with the OPE MA team. The reporting of the project implementation and the communication with the Managing Authority through UMIS seriously reduce the administrative burden.
Greater commitment of the MA to the implementation of activities by state institutions
We recommend to reconsider the procedure of additional agreements to the administrative contracts for non-compensated financial assistance, since currently the input information in the amendment request is duplicated (in the UMIS system and in the amendment request form), which creates an additional administrative burden and creates prerequisites for errors and inaccuracies when filling in the information.
No, I believe that the OPE works in a way that is understandable to the beneficiaries. It indicates the necessary assistance, which is extremely important for the experts of the municipalities.
We had very good communication and timely assistance from the MA

17. How would you rate the benefits of the project compared to the burden of implementing the project?

Answer	Percentage	Number
The financial support provided on the project is without alternative for us and therefore very important.	51.3%	60
The project was useful and its implementation was not particularly difficult for us.	29.9%	35
The project is useful, but also very difficult to implement.	14.5%	17
The project has created more difficulties than benefits.	1.7%	2
In the future, we would rely on a different source of funding for this type of project than OPE.	2.6%	3
	Total	117

18. If it wasn't for the support under OPE, would you have realized the project?

Answer	Percentage	Number
No.	80.3%	94

Yes (please indicate source of funding):	8.5%	10
I cannot decide.	11.1%	13
	Total	117

Yes (please indicate source of funding):	Number
Municipal budget	4
EMEPA	2
Another possible financial source	1
Fund of Funds/Flag Fund	1
own income	2
Total	10

19. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
Reducing the amount of landfilled household waste.	69.9%	51
Reuse of household waste.	19.2%	14
Recycling of household waste.	27.4%	20
Raising public awareness about waste and its management and recovery.	61.6%	45
Preventing the mixing of construction waste with household waste.	20.5%	15
Better utilization of construction waste.	5.5%	4
Increased capacity to manage and implement waste management measures.	27.4%	20
Increased capacity to participate in the formation of local and national policies.	26.0%	19
Other (please specify):	17.8%	13

Other (please specify):	Number
Protection from the harmful influence of atmospheric and surface waters, their penetration to the waste body, the release of odors and dust particles, as well as the scattering of plastics, paper, etc., is stopped. The implementation of the project in the Municipality of Kovachevtsi led to the protection of the environment and people's health.	1
Liquidated landfill	1
Reducing the harmful impact of waste on the environment.	1
Reclamation of reclaimed landfill	7

The knowledge that the children received	1
Use of green waste	1
Ensuring the flow of water - a ravine, previously filled with household waste and improving the aesthetic appearance of the area of the old municipal landfill	1
Total	13

20. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
Improved water supply	36.4%	4
Reduced water losses	36.4%	4
Better drinking water quality	18.2%	2
Better connectivity of the population to the sewage system	63.6%	7
Achieving wastewater treatment requirements	90.9%	10

21. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
Maintaining and improving the conservation status of species.	83.3%	5
Maintaining and improving the nature conservation status of habitats.	50.0%	3
Better awareness of nature conservation and biodiversity.	100.0%	6
Improved planning for the management of biodiversity conservation measures.	50.0%	3
Increased capacity to manage and implement measures to protect biological diversity.	50.0%	3
Increased capacity to participate in the formation of local and national policies.	16.7%	1
Other (please specify):	0.0%	0

22. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
Reduced risk of flooding	25.0%	1
Reduced risk of landslides	75.0%	3
Increased capacity to manage and implement flood and landslide risk prevention and management measures	50.0%	2
Increased crisis response capacity	25.0%	1

Increased capacity to manage and implement measures to protect biological diversity.	0.0%	0
Increased capacity to participate in the formation of local and national policies.	0.0%	0
Other (please specify):	0.0%	0

23. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
Reduction of air pollution with FPM.	95.7%	22
Reduction of air pollution with nitrogen oxides.	13.0%	3
Improved planning of measures to reduce air pollution.	56.5%	13
Increased capacity to participate in the formation of local and national policies.	0.0%	0
Other (please specify):	8.7%	2

Other (please specify):	Number
Renewed fleet serving public transport	1
Improving the quality of life.	1

24. Did the implementation of the project lead to unintended positive or negative effects?

Answer	Percentage	Number
Yes, positive, such as (please specify):	23.1%	27
Yes, negative, such as (please specify):	9.4%	11
No.	67.5%	79
	Total	117

Yes, positive, such as (please specify):
1. Exceptional interest from citizens in the deposit vending system; 2. Reducing the amount of household waste by much more than expected
The euphoria among children in the process of training and campaigns
A significant proportion of households replaced their inefficient appliances
Information about the possibilities of composting has been able to reach a wide range of the public
New vehicles serving public transport, reducing the generation of FPM
Designation of a green area

More comfortable and ecological transport.
Popularity and expressed interest in partnerships, beyond the borders of the country.
The holding of additional informational meetings with the population about the benefits of composting.
Changing the attitude of the population through the implementation of good practices to prevent and reduce the generation of mixed household waste.
Reclaimed municipal terrain (4)
Clean drinking water, zero losses, convenient access for the needs of the RD of the FSPP
implemented measures for the prevention and stopping of landslide processes
Waste reduction
Separation of green waste
A cleaner environment
Increasing administrative capacity
Raising the interest of the population and raising the culture of waste collection and disposal and public awareness (2).
promotion of the ecological network NATURA 200
<ul style="list-style-type: none"> • Conducted campaigns to popularize the results of the demonstration project; • Preventing the formation of household waste materials by using the information and campaign approaches specified in the Waste Management Act; • Disseminated results of the demonstration project. • Increased public self-awareness to comply with the relevant highest level of the household waste management hierarchy; • The direct involvement of the population in household waste management.

Yes, negative, such as (please specify):
There was a need for a large resource - own financing
Unjustified financial corrections imposed
There is no nearby depot and burden on the municipality's budget
Increase in the price of water(2)
The delay of the works of the RIA part
Lack of a national policy for the utilization of RDF
A lot of people left
Unplanned expenses from the municipality
Financial adjustments

25. To what extent was the implementation of your project able to satisfy pressing needs of your municipality?

Answer	Percentage	Number
--------	------------	--------

To a large extent.	64.0%	71
To a certain extent.	28.8%	32
To a small extent.	2.7%	3
The project is not related to urgent needs of our municipality.	4.5%	5
Other (please specify):	0.0%	0
	Total	111

26. Are funds needed and available for operational costs and to support the project's achievements?

Answer	Percentage	Number
Yes, they are needed and we have the funds to cover all costs.	34.2%	38
Yes, they are needed and we have funds to cover part of the costs.	23.4%	26
Yes, they are needed, but we don't have them and we don't have clarity on how we will provide funds to support the project's achievements.	18.9%	21
No funds are required to sustain the project's achievements.	18.9%	21
Other (please specify): (assets have been handed over for WSS operation)	4.5%	5
	Total	111

27. What are the sources of funds for sustaining the achievements of the project? (Please indicate each answer that is correct for you)

Answer	Percentage	Number
State budget.	9.5%	6
Municipal budget.	92.1%	58
Public-private partnership.	0.0%	0
Donors.	0.0%	0
Business initiatives.	3.2%	2
Other (please specify):	11.1%	7

Other (please specify):	Number
Donations	1
OPE	1
Own funds of the partner in the implementation of the project	1
Funds from deductions	3

European funds	1
Total	7

28. Do you plan in the future upgrading or other measures related to the realized benefits of the implementation of your project?

Answer	Percentage	Number
Yes, we already implement such measures.	8.1%	9
Yes, we are planning such measures	33.3%	37
We do not yet have clarity on the need for future complementary measures.	40.5%	45
We are not planning future measures because there is no need for them.	9.0%	10
We are not planning future measures because we do not know where to secure funding from.	9.0%	10
	Total	111

29. Please briefly indicate which:

Answer
Expansion of the system for buying back packaging waste and composting shares. Plans are variable due to the ambiguity of national policy in this area, as well as the implementation of projects in the private sector!
Purchase of additional containers for biodegradable waste for the needs of the municipality.
New project similar
Construction of a separation plant
Purchase of composters for households with funds from the municipal budget, in order to increase the reach.
We carry out biological reclamation.
Purchase of electric buses and construction of bike lanes
Biological reclamation (2)
Construction of RES for own needs to power charging stations for electric vehicles.
Funding will be sought for the planned measures in the updated AAQ programme
Continuation of information campaigns regarding air quality, measures related to transport, landscaping, cleaning, etc.
We are implementing a home composting project
New waste cell at the Regional Solid Waste Landfill.
Expanding the scope of the separate collection of the municipality.
Purchase of a means of transport and a vessel base

Purchase of electric buses for the intercity system New projects to reduce atmospheric air pollution - replacement of solid fuel appliances, secondary dispatch, etc.

Expanding the scope of the system for the separate collection of green waste.

Information campaigns should be regular and not sporadic and should cover all interested parties, in this sense it is necessary to plan them in the future. Question #20 should be answered by colleagues from another directorate, to whom I assume you also sent the survey.

Preparation of next project.

Additional equipment and containers

Designing the rehabilitation of the sewer network for the rest of the city

Purchase composters for home composting

Financing of activities under OPE 2021-2027, priority "Waste", measure 1. Construction, expansion and/or upgrading of municipal/regional systems for separate collection and recycling of biodegradable waste. - systems for separate collection and transportation of household biodegradable waste - garden and food waste, paper, cardboard and wood waste as part of the morphological composition of household waste, with a focus on bio-waste (garden and food).

Implementation of a project under priority 5 "Air"

Application for a similar project in the new program period.

Opportunities to apply for the required separate waste collection activities on the territory of Nikopol municipality

To place additional receptacles for the collection of textile waste

Expanding the final recipients of the target group

Measures related to the control and management of landfills in such a way as to prevent or reduce potential adverse effects on the environment and risks to human health.

We are planning to replace the amortized asbestos water pipes in the villages on the territory of the city of Vratsa.

Introduction of a more comprehensive system for separate waste collection.

Reducing the use of solid fuel and promoting the use of environmentally friendly sources. Increase of green areas and rehabilitation of existing ones.

Placement of additional containers for textile waste

Various types of trees, shrubs and flowers will be planted in the park spaces of the city of Vidin. The funds with which the planting material was purchased were obtained from the handed over old heating devices under the "Improving the quality of atmospheric air" project.

We are working towards a complete renovation of the vehicles serving public transport, which in turn will contribute to the provision of quality service to the citizens and guests of the city.

Purchase of 10 8-meter new zero-emission or low-emission vehicles in accordance with Directive 2019/1161 of the European Parliament, for interurban public transport services

The system for separate collection of green and/or biodegradable waste is being expanded.

A new project together with the Municipalities of Yambol and Nova Zagora under the Eco-mobility procedure "financed by the RRP

Expanding the transport network and serving the population from nearby settlements

Participation in Procedure No. BG16FPMR002-5.001 "For fresh air"

A complete replacement of the city's WSS network is required. With the implementation of the project, only the WWTP and the collectors leading to it were smoothed out (and partially), as the water supply network of the city did not fall within the scope of the project. In the previous program period, simultaneously with the design in the conceptual phase of the WWTP, a complete reconstruction of the water supply network of the city of Chirpan was designed in the working phase. Unfortunately, with the implementation of the current project, only the WWTP was implemented and the city's sewage problems remained.

We will apply within the framework of procedure №BG16FPMR002-5.001, For cleaner air!

Conducting campaigns on the benefits of composting, we continue to conduct clarifications on the need for separate collection, as well as the secondary use of old items. The municipality will continue to hold "creative workshops", which proved to be extremely useful and interesting for children. In another, future project, the municipality is planning eco-walks in the mountains, the purpose of which will again be the benefits of environmental protection.

After the implementation of the project, interest in home composting was provoked among the population and the municipality continues to purchase composters and provide them to households

30. You have reached the end of the survey. Thank you for participating! If there is anything else you would like to share about the OPE 2014-2020, please do so below:

Answer

The data on deposited solid waste in item 21 refer to the municipality

We thank the OPE MA team.

I thank all the conscientious employees of the MOEW, who made great efforts for the successful implementation of the municipal landfill reclamation projects.

The policy regarding the subsequent control of public orders and the imposition of financial corrections should be reviewed. In many cases, in order not to impose financial corrections on us, we make compromises with the selection of contractors by defining selection criteria that are very general and we cannot use them to select quality contractors in order not to be accused of defining restrictive/discriminatory conditions.

We do not have the requested information on the amount of landfilled waste from the Sofia Municipality, therefore we have entered a zero value.

For the Municipality of Petrich, the experience and the achieved results of the implementation of the project are very important, we highly appreciate the management and expert team of the OPE MA - the will and professionalism, the adequate formulation of the goals, the open communications and effective feedback, the commitment to the problems, the teamwork, the motivation and building empathy, high efficiency and capacity of human, organizational and informational capital.

Thanks for the good communication

Our general impression, as well as that of colleagues in other municipalities, is that the MA OPE is looking for any occasion to impose financial corrections on the projects, as in our case several times for the same

one. This does not contribute to the good financial planning of the beneficiaries' expenses and largely demotivates us for future participation in the program.

Launch of the new OPE campaign

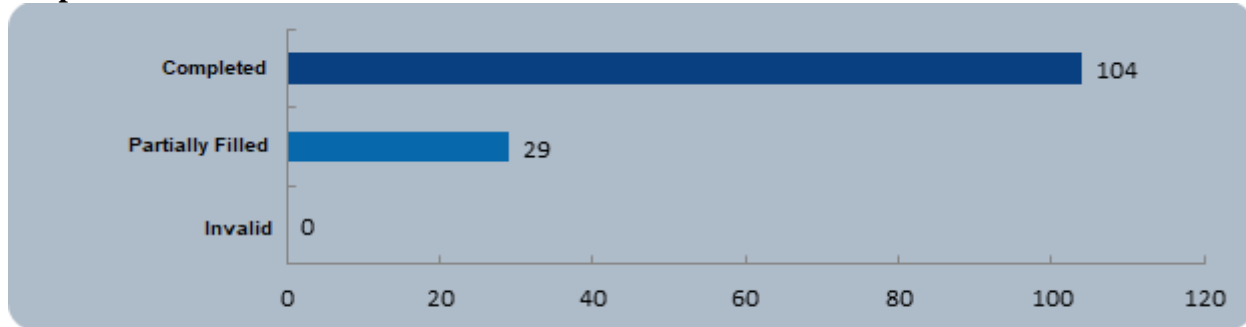
Regarding question 20 of the survey: there is no information on amounts of landfilled waste.

Regarding the determination of financial corrections according to conducted procedures for the selection of contractors, when the procedures have been checked by all responsible authorities according to the requirements of the program, financial corrections should not continue to be determined constantly - throughout the life cycle of a constructed installation.

We thank the OPE MA team for the fruitful cooperation in the implementation and reporting of the project.

SURVEY AMONG PUBLIC INSTITUTIONS, BENEFICIARIES UNDER PA3 OF OPE 2014-2020

Response statistics



	Number	Percentage
Completed	20	83.3
Partially filled	4	16.7
Invalid	0	0
Total	24	

1. Please indicate the type of organization you represent:

Answer	Percentage	Number
National Park Directorate.	13.0%	3
Nature Park Directorate (MoAF-EFA).	13.0%	3
Executive Environmental Agency	4.3%	1
MOEW	13.0%	3
RIEW.	26.1%	6
State Enterprise for Forest Management.	30.4%	7
	Total	23

2. Please note the procedure by which your project was financed.

Answer	Percentage	Number
3.005 Designation and completion of the network of marine protected areas	4.5%	1
3.006 Raising stakeholder awareness of the Natura 2000 network	4.5%	1
3.001 Development of a management approach for the Natura 2000 network and for management of the NPFA	4.5%	1
3.003 Analyzes and studies of species and natural habitats subject to reporting under Art. 17 of the Habitats Directive and Art. 12 of the Birds Directive	4.5%	1

3.007 Improvement of the nature conservation status of species and types of natural habitats on the territory of the Natura 2000 network falling into national parks, natural parks and maintained reserves	36.4%	8
3.021 Improving the Conservation Status of Natural Habitats	4.5%	1
3.015 Implementation of priority measures in wetlands	18.2%	4
3.035 Improving the conservation status of forest natural habitats and supporting the ecosystem services provided by forests through the application of silvicultural practices and afforestation	22.7%	5
	Total	22

3. Please note the status of your project:

Answer	Percentage	Number
In execution.	68.2%	15
Finished.	22.7%	5
Temporarily suspended.	9.1%	2
	Total	22

4. To which measures/investments are the specific "products" of your project related? (Please indicate each correct answer for you).

Answer	Percentage	Number
Developing and implementing a management approach for Natura 2000 Protected Areas (PAs) and increasing the management capacity of the Natura 2000 network.	19.0%	4
Investments to maintain and improve the nature protection status of species and natural habitats in the Natura 2000 network Determination and addition of the network of protected areas.	71.4%	15
Analyzes and studies of species and natural habitats subject to reporting under Art. 17 of the Habitats Directive and Art. 12 of the Directive on birds in sea and coastal areas and in the land part of the country.	9.5%	2
Support for the development and management of ecosystem services.	19.0%	4
Construction, Development and Support of a Shared Vision for the Ecological Network Natura 2000 in Bulgaria.	4.8%	1
Maintaining biodiversity, genetic diversity and forest resilience.	23.8%	5

5. What are the expectations regarding the implementation of your project by the end of 2023?

Answer	Percentage	Number
The project will fully achieve (has achieved) its objectives.	90.5%	19
The project will partially achieve (has achieved) its objectives.	4.8%	1

The project will not achieve (has not achieved) its objectives.	4.8%	1
	Total	21

6. Please explain why:

Answer
The LA of the BDA has not yet been adopted
The project has been temporarily suspended due to violations by the contractor found by the project management team, which is why an irregularity has been reported to the OPE MA and the project documentation has been submitted to the District Attorney's Office-Montana.

7. What are the main reasons for the difficulties you encounter/have encountered in achieving the project's goals? (Please indicate each answer that is correct for you).

Answer	Percentage	Number
The set goals were/are not realistic.	4.8%	1
Lack of sufficient financial resources to co-finance the activities.	4.8%	1
Difficulties and delays in implementation.	47.6%	10
High administrative burden OPE/bureaucratic procedures beyond the control of the beneficiary.	33.3%	7
Delays in obtaining necessary documents of an administrative nature (in fulfillment of registration, license or permit regimes).	14.3%	3
Difficulties in preparing tender documentation for contractor selection.	23.8%	5
Difficulties in the process of conducting contractor selection procedures.	33.3%	7
Appeal of the procedure(s) for the selection of the contractor(s).	28.6%	6
Lack of project management experience.	14.3%	3
The lack of sufficient human resources to manage the project.	9.5%	2
Delay/bad performance by contractors/subcontractors.	14.3%	3
Planning lapses.	9.5%	2
Changes in strategic and political priorities (please explain):	4.8%	1
Ambiguities regarding the future use of the project proceeds.	4.8%	1
Difficulties due to irregular cash receipts through OPE payments.	9.5%	2
To report progress in the technical reports submitted during UMIS2020.	4.8%	1
To prepare the documents for verification of expenses.	9.5%	2
Other (please specify):	14.3%	3
We had no difficulties.	14.3%	3

Other (please specify):

High inflation and difficulties for the executors of individual contracts to fulfill the agreed back in 2020. It concerns contracts that are implemented within the 4 years of project implementation.(2)

Short deadlines for preparation, implementation and reporting of project activities.

8. Are there things that, if you were starting the planning and/or implementation of the project now, you would do differently? Please clarify which/what?

Answer

None (10)

We would carry out more extensive preliminary studies to identify the specific activities to be carried out under the project.

Yes, I would not tie the activities of the project to an unadopted and an unapproved LA of a given law.

A realistic deadline for the preparation of the project proposal and a corresponding deadline for the implementation of the project.

Yes, more precise selection of areas for afforestation

Setting realistic and feasible goals and activities for the organization.

Due to a change in the political, economic and social situation in the country, during the implementation of the project, it was found that the planned financial resources were insufficient for the implementation of the activities and the expected results. In this regard, the technical specifications and intended results should be envisaged for implementation in a larger range.

No, given the terms of the procedure. To consider the possibility of implementing the projects related to scientific studies and analyses, in partnership with scientific institutions.

Yes, optimizing the volume of individual activities!

If we start planning the project now, we would set a total area for the implementation of the activities, not concrete subdivisions, since we are dependent on many factors that affect the implementation, such as high waters of the Danube River and flooded areas in which we will carry out the activities and etc.

I wouldn't plan on buying a piece of equipment of little value.

9. What activities organized by the MA to support project management and implementation have you participated in? (Please indicate each answer that is correct for you.)

Answer	Percentage	Number
Trainings.	85.0%	17
Workshops.	15.0%	3
Information campaigns.	25.0%	5
Other (work meetings).	20.0%	4

10. Please rate the support you received/are receiving from the OPE Managing Authority in relation to the implementation of your project?

Answer	Percentage	Number
Sufficient and timely.	80.0%	16
I cannot decide.	20.0%	4
	Total	20

11. How would you rate the change in the administrative burden of implementing the project at the beginning of the project and now?

Answer	Percentage	Number
The administrative burden increased.	20.0%	4
The administrative burden decreased slightly.	10.0%	2
The administrative burden decreased significantly.	5.0%	1
Unchanged.	65.0%	13
	Total	20

12. Please explain why:

Answer
There is no frequent change of rules
Lack of awareness and connection between the individual units in the MA OPE. Several procedures are carried out for the same thing, and the requirements of the individual units to the beneficiaries and the requirements to the scope of the package of documents are different. During follow-up control, even minor omissions are sought or such are formulated to impose financial corrections.
Delay in the consideration of a request to amend the project. Lack of communication and information between the structures in the MA - programming, project implementation, subsequent control
The document turnover in connection with the submission of requests for interim payments is increasing, as well as the lack of reference/forecasts for upcoming payment requests.
We have to comply with the MA requirements for project reporting.

13. Do you have recommendations for improvements in the OPE implementation process and lightening of the administrative burden? Please specify:

Answer
No (10)
Timely start of procedures
Requirement of fewer documents proving expenses.

Greater communication between the managing authority and the beneficiaries, especially when they are from the same system. Conducting more trainings, workshops and formulating requirements that are accessible to all participants in the process.

To harmonize the requirements between the structures in the MA - programming, project implementation, subsequent control, as well as to implement a mechanism to improve communication and exchange of information between them

We recommend that DG OPE do not necessarily impose financial corrections that will be rejected for sure on appeal in a courtroom - they only generate unnecessary problems, waste of time and unnecessary costs for all involved.

To use the information submitted with the technical reports for the preparation of reports and analyses, and not to additionally require the preparation of current reports containing essentially the same information. To update and supplement the instructions for the beneficiaries based on the most common difficulties and mistakes made, as well as taking into account the peculiarities of the individual beneficiaries, as well as the different implementation conditions during the implementation of the program.

More guidance for the beneficiary

Due to the short deadlines for implementation and the numerous factors that threaten the overall realization of the project, there should be more flexibility in requesting the replacement of some areas with others.

More clarification on project reporting.

14. How would you rate the benefits of the project compared to the burden of implementing the project?

Answer	Percentage	Number
The financial support provided on the project is without alternative for us and therefore very important.	40.0%	8
The project was useful and its implementation was not particularly difficult for us.	15.0%	3
The project is useful, but also very difficult to implement.	35.0%	7
The project has created more difficulties than benefits.	10.0%	2
	Total	20

15. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
Maintaining and improving the conservation status of species.	65.0%	13
Maintaining and improving the nature conservation status of habitats.	90.0%	18
Better awareness of the conservation of nature and biological diversity.	35.0%	7
Positive behavioral changes regarding biodiversity conservation.	25.0%	5
Improved planning for the management of biodiversity conservation measures.	35.0%	7
Increased capacity to manage and implement policy formation, application and implementation in the field of Natura 2000 to improve the conservation status of species and natural habitats.	30.0%	6

Answer	Percentage	Number
Favorable conditions have been created for future investments in the protection of natural and biological diversity.	25.0%	5
More effective implementation of environmental legislation.	10.0%	2
Improved prospects for local/regional social and economic development.	5.0%	1
Improved cooperation and coordination between stakeholders.	15.0%	3
Other (please specify): Collected new data and information on the distribution and status of species and types of natural habitats	5.0%	1

16. Did the implementation of the project lead to a positive change in the local community, at the municipal, regional or national level regarding the protection of natural and biological diversity, including in a wider social and economic aspect?

Answer	Percentage	Number
Yes, in terms of:	20.0%	4
To some extent in terms of:	45.0%	9
No.	35.0%	7
	Total	20

Yes, in terms of:	Number
Protection of biological diversity	1
awareness of the population and promotion of the site (2)	1
Conservation of species and types of habitats	1

To some extent in terms of:	Number
Awareness (3)	1
Natura 2000 (2)	1
The project is still in progress, with a number of events planned to inform and popularize its activities and results, which we hope will have a similar effect	1
reducing the anthropogenic impact on species and habitats and providing better conditions for tourism	1
Conservation and restoration of natural forest habitats	1
Natural and biological diversity	1

17. If it wasn't for the support under OPE, would you have realized the project?

Answer	Percentage	Number
--------	------------	--------

No.	75.0%	15
Yes (please indicate source of funding): The project is related to the fulfillment of national commitments to the EU, accordingly, other sources - national or international - would have been sought	5.0%	1
I cannot decide.	20.0%	4
	Total	20

18. Did the implementation of the project lead to unintended consequences/effects?

Answer	Percentage	Number
Yes, positive, such as (please specify): Improving the conservation status of forest habitats, supporting the ecosystem services provided by forests	5.0%	1
Yes, negative, such as (please specify):	15.0%	3
No.	80.0%	16
	Total	20

Yes, negative, such as (please specify):	Number
The fraudulent implementation of one of the activities provided for in the project led to the current state of the project - temporarily suspended, and hence the impossibility of completing it to the end.	1
Changing the chosen management approach	1
Loss of funds	1

19. Are funds needed and available for operational costs and to support the project's achievements?

Answer	Percentage	Number
Yes, they are needed and we have the funds to cover all costs.	35.0%	7
Yes, they are needed and we have funds to cover part of the costs.	25.0%	5
Yes, they are needed, but we don't have them and we don't have clarity on how we will provide funds to support the project's achievements.	20.0%	4
No funds are required to sustain the project's achievements.	15.0%	3
Other (please specify): One of the expected results of the project is optimization of monitoring costs from the national budget. Regular monitoring and evaluation of the PS are national commitments and should be provided by the national budget.	5.0%	1
	Total	20

20. What are the sources of funds for sustaining the achievements of the project? (Please indicate each answer that is correct for you.)

Answer	Percentage	Number
State budget.	50.0%	6
Public-private partnership.	8.3%	1
Donors.	8.3%	1
Business initiatives.	33.3%	4
Other (please specify): own funds and commercial activity	16.7%	2

21. Do you plan in the future upgrading or other measures related to the realized benefits of the implementation of your project?

Answer	Percentage	Number
Yes, we already implement such measures.	10.0%	2
Yes, we are planning such measures.	30.0%	6
We do not yet have clarity on the need for future complementary measures.	45.0%	9
We are not planning future measures because there is no need for them.	5.0%	1
We are not planning future measures because we do not know where to secure funding from.	10.0%	2
	Total	20

22. Please specify which:

Answer
Measures related to maintaining habitats - mowing meadows, cleaning water mirrors of unwanted vegetation, cleaning litter, maintaining barriers and signs
Preparation of management plans
Maintenance of the built infrastructure and periodic firing of the supporting measures.
Use of purchased equipment and built infrastructure to multiply the achieved results of the project in the future
Formalize the proposed changes in monitoring methodologies, carrying out monitoring and reporting activities, as well as reflecting the proposed changes in the standard forms of the protected areas.
Third phase
Trainings and participation in projects

23. Do you think there is a need for other measures that OPE could have supported in order to respond more fully to the needs in the 'Natura 2000 and Biodiversity' sector?

Answer	Percentage	Number
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No.	15.0%	3
Yes (please tick which ones):	15.0%	3
I cannot decide.	70.0%	14
	Total	20

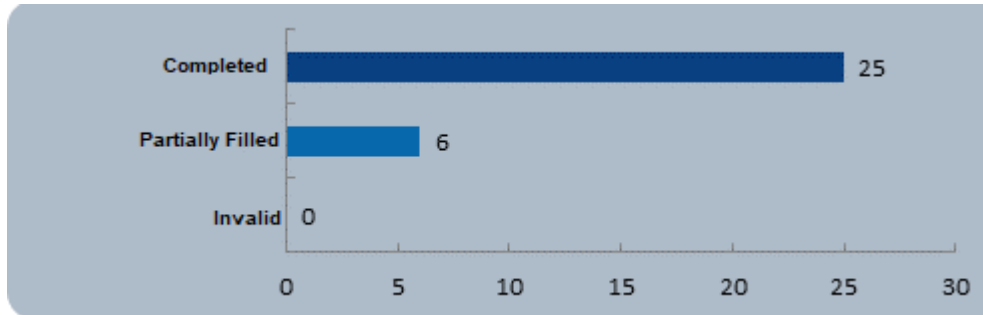
Yes (please tick which ones):	Number
Purchase of lands in Nature Parks; Renewal of roads to important habitats, etc.	1
Specific measures to maintain and restore the nature conservation status of natural habitat types and species, including after the purchase of land from private owners.	1
By simplified application for projects with small financial resources	1

24. You have reached the end of the survey. Thank you for participating! If there is anything else you would like to share about the OPE 2014-2020, please do so below:

Answer
no, thanks!

STUDY AMONG PROFIT AND NON-PROFIT LEGAL ENTITIES, BENEFICIARIES OF THE OPE

Response statistics



	Number	Percentage
Completed	25	80.6
Partially filled	6	19.4
Invalid	0	0
Total	31	

1. Please indicate if you are:

Answer	Percentage	Number
Profit Legal Entity	30.0%	9
Non-Profit Legal Entity	70.0%	21
	Total	30

2. Please indicate which OPE priority axis your project is on:

Answer	Percentage	Number
PA2 "Waste".	53.3%	16
PA3 "Natura 2000 and biodiversity".	46.7%	14
	Total	30

3. Please note under which procedure your project was financed.

Answer	Percentage	Number
3.016 Measures for Improving the Conservation State of Birds	7.1%	1
3.018 IMPROVING THE NATURE CONSERVATION STATUS OF SPECIES IN THE NATURA 2000 NETWORK THROUGH THE SCIENCE APPROACH IN THE TERRITORY OF LAG TUNDZHA	14.3%	2
3.019 Shared Vision for the Ecological Network Natura 2000 in Bulgaria	21.4%	3
3.020 Preparation/update species action plans	21.4%	3

3.028 LAG Svilengrad Areal, Improvement of the nature protection status of species in the Natura 2000 network through the CLLD approach in the territory of LAG Svilengrad Areal-2	7.1%	1
3.013 - LAG Belene-Nikopol Improvement of the nature protection status of species from the Natura 2000 network through the approach CLLD in the LAG Belene-Nikopol	7.1%	1
3.031 Shared Vision for the Ecological Network Natura 2000 in Bulgaria - 2	7.1%	1
3.033 Improving the Conservation Status of Natural Habitats - 2	14.3%	2
	Total	14

4. Please indicate the status of your project:

Answer	Percentage	Number
In execution.	53.3%	16
Finished.	46.7%	14
	Total	30

5. What are the expectations regarding the implementation of your project by the end of 2023?

Answer	Percentage	Number
The project will fully achieve (has achieved) its objectives.	100.0%	30
	Total	30

6. Please explain why:

Response ID	Answer

7. Are there things that, if you were starting the planning and/or implementation of the project now, you would do differently? Please clarify which/what?

Answer
1. Expanding the territorial scope of the project. The interest in the activity is very high. 2. Anticipating activities for more work with local authorities and financial incentives for the population to get involved 3. Up-to-date budgeting in view of the huge accumulated inflation and increased costs of labor, materials and services from the moment of submission of the project proposal to the moment of the start of its implementation
Yes. Many of the activities could be better planned. Prices are also different because of inflation.
Addition of more activities related to software capabilities.
No (14)
We would insist on much more effective training and the provision of uniform rules that are applied in the implementation by the MA - our experience shows that the monitoring experts apply different requirements

when they are not sure or want to be extra sure. We are often asked for things that are an expression of a direct unnecessary administrative burden.

The communication channels used in the dissemination of project results.

We would plan the outsourcing of the external activities in a different way

Yes. As a project manager I think that for our project in particular, it would be more efficient to have hardware and software on one order and one tender. The other thing is: The municipality should have been involved much more in the project, as the results will be used by it to create a new way of calculating the garbage fee.

Planning a longer term for obtaining consent from owners of properties located in the distribution of habitats.

More careful planning of indicators.

Yes, we have some things on the budget that we would like to clarify

I will predict a drastic delay by the MOEW (Directorate of NNPS) of the activities and the deadlines that depend on them.

A completely new way of both planning and execution. 1. It was necessary to apply for a revolving loan immediately, and not to wait for the advance after 4 summer months, which greatly delayed the implementation. Because only after the advance did we order a project with topographical and phytocentological data. It took all fall. Running out of space, I can write two pages of errors.

We would match the activities that require the presence of stakeholders with the specifics of the seasons during which they are implemented.

8. What are the main reasons for the difficulties you encounter/have encountered in achieving the project's goals? (Please indicate each answer that is correct for you).

Answer	Percentage	Number
The set goals were/are not realistic.	3.8%	1
Lack of sufficient financial resources to co-finance the activities.	11.5%	3
Difficulties and delays in implementation.	26.9%	7
High administrative burden OPE/bureaucratic procedures beyond the control of the beneficiary.	30.8%	8
Delays in obtaining necessary documents of an administrative nature (in fulfillment of registration, license or permit regimes).	11.5%	3
Difficulties in preparing tender documentation for contractor selection.	3.8%	1
Difficulties in the process of conducting contractor selection procedures.	11.5%	3
Appeal of the procedure(s) for the selection of the contractor(s).	3.8%	1
Lack of flexibility in implementation and inability to make changes in activities to respond to the changing environment due to limitations imposed by legislation.	30.8%	8
Lack of project management experience.	7.7%	2
The lack of sufficient human resources to manage the project.	11.5%	3

Delay/bad performance by contractors/subcontractors.	3.8%	1
Planning lapses.	11.5%	3
Changes in strategic and political priorities (please explain): inflationary processes	3.8%	1
Ambiguities regarding the future use of the project proceeds.	7.7%	2
To understand and/or fulfill the requirements of the OPE MA.	11.5%	3
Difficulties due to irregular cash receipts through OPE payments.	3.8%	1
To report progress in the technical reports submitted during UMIS2020.	3.8%	1
To report the implementation of project indicators.	7.7%	2
To prepare the documents for verification of expenses.	7.7%	2
Other (please specify):	11.5%	3
We had no difficulties.	26.9%	7

Other (please specify):
Technical reasons
Mistakes we made due to our lack of experience in this field. Everything is fixable, but figure out how only in the end.
The financial scheme for the implementation of the projects is unfair for the non-profit organizations, the lack of funds in the NGOs does not allow flexible advance financing for the implementation of the projects. The impossibility of using loans from banks or any other pre-financing mechanism hinders the participation of NGOs in the programs.

9. What activities organized by the MA to support project management and implementation have you participated in?

Answer	Percentage	Number
Trainings.	34.6%	9
Workshops.	3.8%	1
Information campaigns.	26.9%	7
Other	7.7%	2
We have not participated in such activities.	26.9%	7
Don't know	7.7%	2

Other
We were emailed a manual without any explanation or opportunity to ask about some pretty obscure things

The MA did not support project management, only manuals were sent and this was counted as training. With the exception of the technical coordinator of the MA in charge of the project, to whom we have no objections, in general the MA does not behave as a partner, but only as a controller.

10. Please rate the support you received/are receiving from the OPE Managing Authority in relation to the implementation of your project?

Answer	Percentage	Number
Sufficient and timely.	70.4%	19
Sufficient but untimely.	3.7%	1
Insufficient.	18.5%	5
I cannot decide.	7.4%	2
	Total	27

11. How would you rate the change in the administrative burden of implementing the project at the beginning of the project and now?

Answer	Percentage	Number
The administrative burden increased.	15.4%	4
The administrative burden decreased slightly.	3.8%	1
The administrative burden decreased significantly.	11.5%	3
Unchanged.	69.2%	18
	Total	26

12. Please explain why:

Answer
There is more to work on. An electronic signature may be used and no stamp to be required as a mandatory attribute.
Due to the reasons noted in the "Difficulties" section - non-working institutions, lack of any commitment on the part of OPE to provide assistance - even with regard to the secondary budget managers of the MOEW
On our side, the team gained more experience and confidence. On the part of the OPE MA, the trust in us and the understanding of a problem that arose in the project grew.
Due to unexpected requirements for the way of filling out the documentation for payment request, filling out a technical report in UMIS, etc.
There was no need for more administrative paperwork

13. Do you have recommendations for improvements in the OPE implementation process and lightening of the administrative burden? Please specify:

Answer

It would be beneficial to shorten the terms for consideration of documents submitted by the beneficiaries to the OPE (documents for the implementation of PC, submitted requests for payment, submitted documents for amendment, etc.)

To reduce the number of required documents and evidence for the implementation of the activities in the reporting of the project. To extend and facilitate the application procedure.

No (16)

To comply with the Regulations and edit the Regulations related to the implementation of projects. With regard to the NGO sector - for example, the principle of Regulation (EU) No. 1303 / has not been transferred to REGULATION No. N 3 of May 22, 2018, which at the moment does not treat different beneficiaries equally, due to the fact that it takes into account differences between individual types of beneficiaries. In the specific case, the problem for NGOs stems from the fact that they are not economic operators and resp. do not carry out economic activity, but carry out activities for the public benefit and do not generate financial income, nor do they own assets, on the basis of which they would be able to establish bank guarantees. Ordinance 3 in summary is discriminatory towards the NGO sector, given that the NGO sector is not given access to a financial resource for implementation to a special fund, as are the municipalities

No, we have not experienced any administrative burden during the implementation of the project. We have only received assistance and competent guidance and direction.

Carrying out preliminary control of the procedures of the contractor's choice.

Measure results and stop backlog. Everything electronic must remain electronic, there is no need to print every accounting report on paper. Tons of useless papers fill the cupboards - ours and yours.

For us, this is the first such project under OPE and I cannot compare it with any other.

Greater flexibility

1. By virtue of the contract concluded with the MA, the contractors are defined as project implementation partners. The partnership implies mutual assistance for the good implementation and reporting of the projects. In our relationship, the MA emphasized only its control functions. Our recommendations relate to the MA partnering and supporting the implementation process, which is of mutual interest. The trainings that are included in the contracts are mandatory for the beneficiaries and not recommended. Sending a manual on management processes (which in some places is written so that only the authors can understand it) is not training, but self-training.

There is a need for optimization of the UMIS, with the ability to search correspondence, clearer guidance when inquiring about the interpretation and application of the Uniform Manual, the Guide, etc. program documentation, faster verification of POD, faster follow-up control, disbursement of verified funds, etc. Adding a pre-check before conducting procedures for awarding activities, instead of imposing corrections.

I think that we, the beneficiaries, are in most cases the faulty ones and there is no need to look for blame or errors in the MOEW. There are established rules and whoever doesn't like them can give up their project and that's it.

14. How would you rate the benefits of the project compared to the burden of implementing the project?

Answer	Percentage	Number
The financial support provided is without alternative for us and therefore very important.	40.7%	11
The project was useful and its implementation was not particularly difficult for us.	29.6%	8

The project is useful, but also very difficult to implement.	18.5%	5
In the future, we would rely on a different source of funding for this type of project than OPE.	11.1%	3
	Total	27

15. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
Reducing the amount of landfilled household waste.	84.6%	11
Reuse of household waste.	46.2%	6
Recycling of household waste.	61.5%	8
Raising public awareness about waste and its management and recovery.	84.6%	11
Preventing the mixing of construction waste with household waste.	15.4%	2
Better utilization of construction waste.	7.7%	1
Increased capacity to manage and implement waste management measures.	30.8%	4
Increased capacity to participate in the formation of local and national policies.	30.8%	4
Other (please specify): Composting of household waste	7.7%	1

16. Please note the benefits you expect from the implementation of your project. (Please indicate each correct answer for you).

Answer	Percentage	Number
Maintaining and improving the conservation status of species.	69.2%	9
Maintaining and improving the nature conservation status of habitats.	38.5%	5
Better awareness of nature conservation and biodiversity.	69.2%	9
Improved planning for the management of biodiversity conservation measures.	30.8%	4
Increased capacity to manage and implement measures to protect biological diversity.	30.8%	4
Increased capacity to participate in the formation of local and national policies.	23.1%	3

17. If it wasn't for the support under OPE, would you have realized the project?

Answer	Percentage	Number
No.	69.2%	18
Yes (please indicate source of funding): The question is incorrect because state policy is being implemented - an NGO, municipality, etc. can implement the project as long as it is not already funded	3.8%	1
I cannot decide.	26.9%	7

	Total	26
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18. Did the implementation of the project lead to unintended positive or negative effects?

Answer	Percentage	Number
Yes, positive, such as (please specify):	19.2%	5
Yes, negative, such as (please specify): Delay in the disbursement of funds, which hinders the implementation of the project	3.8%	1
No.	76.9%	20
	Total	26

Yes, positive, such as (please specify):	Number
All new participants in the project - the selected contractors asked to join the activities to reduce the amount of landfilled household waste.	1
Interest from subjects outside the territorial scope of the project	1
Improving communication between different institutions in order to solve a problem that arose in connection with the implementation of the project	1
Popularity and expressed interest in partnerships, beyond the borders of the country.	1
Created positive attitudes and models of public behavior aimed at protecting biodiversity and protected areas under NATURA 2000	1
Total	5

19. Are funds needed and available for operational costs and to support the project's achievements?

Answer	Percentage	Number
Yes, they are needed and we have the funds to cover all costs.	26.9%	7
Yes, they are needed and we have funds to cover part of the costs.	19.2%	5
Yes, they are needed, but we don't have them and we don't have clarity on how we will provide funds to support the project's achievements.	30.8%	8
No funds are required to sustain the project's achievements.	19.2%	5
We will support what's been created with the capacity of the association, the members will support it. It doesn't take much for the maintenance, I hope we can handle it.	3.8%	1
	Total	26

20. What are the sources of funds for sustaining the achievements of the project? (Please indicate each answer that is correct for you.)

Answer	Percentage	Number
State budget.	8.3%	1

Municipal budget.	8.3%	1
Public-private partnership.	33.3%	4
Donors.	25.0%	3
Business initiatives.	41.7%	5
Other (please specify): Own funds	8.3%	1

21. Do you plan in the future upgrading or other measures related to the realized benefits of the implementation of your project?

Answer	Percentage	Number
Yes, we already implement such measures.	3.8%	1
Yes, we are planning such measures.	30.8%	8
We do not yet have clarity on the need for future complementary measures.	30.8%	8
We are not planning future measures because there is no need for them.	11.5%	3
We are not planning future measures because we do not know where to secure funding from.	23.1%	6
	Total	26

22. Please briefly state which:

Answer
Replication beyond the territorial framework of the current project.
The project was about composting. We plan to apply for the purchase of more composters for the population and institutions of Valchi Dol municipality, Varna region.
Engaging young people in volunteer activities for the protection of protected species in protected areas
Registered trademark CEMIS (Registration certificate Article 51(2) EUTMR and Article 9 EUTMIR). Coverage of the territory of the entire country, as well as pilot introduction of the model outside the borders of the country. Upgrading the functionality of the model.
Expanding the scope of the project, promoting the product and other related.
OPE projects for the new programming period in the same region.
Monitoring of project implementation, conducting seminars.
To create a network of organizations to join our cause.

23. You have reached the end of the survey. Thank you for participating! If there is anything else you would like to share about the OPE 2014-2020, please do so below:

Answer
We are extremely satisfied with the colleagues we worked with from OPE. They assisted us in the realization of the activities in a timely and competent manner. For us, this was the first eco-themed project

and we are satisfied with the project and the results related to it. THANK YOU to the OPE colleagues for their assistance. This gives us optimism and we hope for future cooperation during the new program period as well.

Thank you for your support and assistance!


No, thanks and good luck!

Thanks for your understanding and support!

The cooperation of the experts from the MA is very important for us, we encounter support and professionalism in cases that arise.

Good luck!

Annex 10. Selected projects supported under OPE

Project: BG16M1OP002-1.009-0001 "Wastewater treatment plant of the city of Aytos"	
Priority Axis 1: "Waters"	
Procedure: No. BG16M1OP002-1.009 "Implementation of early water and sanitation projects - component 2";	
Total value: BGN 14,305,450.21	Performance period: January 2017 - April 2022
Beneficiary: Aytos Municipality	
<p>Objectives of the project: To contribute to the achievement of one of the main priorities of the EU Strategy for the Danube Region, namely: "Restoration and preservation of water quality, set as a goal in "Protection of the environment in the Danube region". The project is aimed at implementing national legislation corresponding to a number of EU directives: The Water Framework Directive and its subsidiary directives, Directive 91/271/EEC on the treatment of urban waste water and Directive 98/83/EC on the quality of water intended for human consumption.</p> <p>Completed activities: Wastewater treatment plant has been constructed for the city of Aytos and connecting inlet and outlet collector, together with the accompanying infrastructure to the sewage treatment plant. The existing main collectors are connected to the feeders. The pre-developed and approved conceptual design (CD) for the construction of a sewage treatment plant in the city of Aytos and conceptual design for linear infrastructure, on the basis of which the technical/working designs were developed, have ensured compliance with the deadline for the construction and overall implementation of the project.</p> <p>Implementation is efficient and effective thanks to the composition of the mixed project management team, including internal members familiar with the project object and external members well versed in the specifics of the program. Other favorable factors are the on-site investor control and meetings with the Management Board to solve problems that have arisen.</p>	
 	
 <p>Achieved results and effects: A concrete result of the implementation of the project is the achievement of connectivity of the existing sewage system with the treatment plant, which achieved wastewater treatment. Over 22,000 residents of the municipality have access to improved wastewater treatment. In the long term, the project contributes to compliance with basic standards in the field of water management.</p>	

Project: BG16M1OP002-1.019-0001-C01 "Improving monitoring of the chemical state of groundwater"

Priority Axis: "Waters"

Procedure: BG16M1OP002-1.019 "Completion and equipment of networks for control and operational monitoring of the chemical state of groundwater"

Total value: BGN 14,999,725.87, of which national co-financing: BGN 2,249,958.88

Performance period: January 2021 - January 2023

Beneficiary: Executive Environmental Agency

Specific objectives of the project: Study of the chemical composition of priority substances and specific pollutants in underground water bodies, through laboratory-analytical activity; Research, planning and design of the expansion and/or optimization of the monitoring network of all underground water bodies; Preparation of control and operational monitoring programs on the territory of the four basin directorates; Design and reconstruction of existing and construction of new groundwater monitoring points; as well as equipment at points.



Completed activities :The implemented activities correspond to the specific objectives of the project and are grouped as follows: Activity 1 "Study of the chemical composition of groundwater and carrying out sampling in points outside the monitoring programs"; Activity 2 "Study and planning of control and operational monitoring activities" and Activity 3 "Rehabilitation and completion of monitoring points for control and operational monitoring of groundwater quality". The project was implemented in close

coordination with the Directorate "Waters" of the MOEW and the basin directorates, which is a prerequisite for its qualitative and timely implementation.

Achieved results and effects: As a result of the project, twenty monitoring points have been brought into line with the regulatory requirements in the field of groundwater, both in terms of accessibility and the possibility of sampling, and in terms of quick traceability of groundwater quality. The rehabilitation and equipment of the monitoring points allow the automated sampling and detection of contamination in the groundwater at the moment. It is possible to detect accidents due to natural disasters and submit timely signals to the WSS companies in the relevant area. The project is of great public importance. The new equipment enables automatic analysis and provision of real-time data and full compliance with regulatory requirements. Laboratories carry out tests on all components. Groundwater monitoring objectives have been met. There are 2 samplings per day from 600 points. The project has a direct contribution to improving the evaluation of water status, as it provides the necessary data

to meet the requirements of the Water Framework Directive.



Project: BG16M1OP002-2.002-0007 "Design and construction of a composting installation and an installation for pre-treatment of household waste in the municipality of Petrich"

Priority Axis 2: Waste

Procedure: BG16M1OP002-2.002 "Combined procedure for design and construction of composting installations and installations for preliminary treatment of household waste"

Total value: BGN 7,095,998.09

Performance period: November 2017 - March 2021

Beneficiary: Petrich municipality

Objectives of the project: to reduce the amount of household waste for disposal and to increase the recycled and recovered waste in the municipality of Petrich, which constitutes an independent region for waste management.

Completed activities:

Based on a conceptual design for a pre-treatment plant for domestic waste, a composting plant for separately collected green waste and a pre-treatment plant for domestic waste were designed and built. The necessary site infrastructure has been built. Purchased equipment and machinery for the separate collection and transportation of biodegradable (green) household waste and the necessary machinery for the operation of the installations.



Among the favorable factors for the successful implementation and sustainability of the project can be mentioned:

- The selection of the waste disposal site and the preparation of the work project in the area of an existing landfill, where an area for the construction of a separation plant has already been provided, which saved time for site disposal procedures.
- The preliminary preparation for the drafting of the project proposal - a Waste Management Program for the period 2015-2020 and a morphological analysis of the generated waste was prepared.
- The timely assistance provided by the OPE experts.
- The determination of a good operator of the two installations, who would achieve the set goals.

The fact that the Municipality of Petrich is an independent region for waste management and the built installations serve only the settlements on the territory of the municipality. All settlements are involved in organized collection and transportation of waste to the installations. The installations are managed according to a contract with clearly defined rules and the set goals are achieved.

Achieved results and effects:



The supported investment contributes to the improvement of resource efficiency in the municipality of Petrich, as waste becomes a resource - the composting plant produces quality compost, and the pre-treatment plant separates the useful components from the mixed household waste and will send them for recycling. An improvement in the quality of the environment for the residents of the municipality (nearly 50,000 inhabitants) has been achieved by reducing harmful emissions from waste disposal; creation of new jobs, necessary to service the introduced system for separate collection of green waste and to operate the two constructed installations, etc. The project is a demonstration of good practice due to the following characteristics: i) All activities related to composting, preliminary treatment and

disposal of waste are carried out at one site; ii) The compost formed by the installation is used to restore green areas on the territory of the municipality and is provided free of charge to the citizens; iii) Campaigns are organized to hand over green waste against the provision of ready compost.

Project: BG16M1OP002-2.010-0020 "Closing and reclamation of an old landfill for solid domestic waste of the municipality of Stara Zagora"

Priority Axis: "Waste"

Procedure: BG16M1OP002-2.010 Reclamation of landfills for closure subject to EU infringement procedure in case C-145/14

Total value: BGN 6,815,177.31

Performance period: May 2020 - April 2022

Beneficiary: Stara Zagora Municipality

Project goals: The landfill ceased its activity at the beginning of 2017, by virtue of the decision of the RIEW, as it does not meet modern environmental requirements. The main goal of the project is the fulfillment of the obligations of the Republic of Bulgaria under Directive 1999/31/EC regarding the disposal of waste and the fulfillment of the decision of the Court of the EU of 16.07.2015 in case C-145/14.

Completed activities: The technical reclamation of the grounds, including: field cleaning; pre-deposition, compaction, re-sloping; profiling and shaping of the ground base for the construction of a support dike and laying of a sealing layer; drainage and construction of a drainage system for leachate; construction of monitoring wells, level benchmarks and a biogas capture and treatment system.

Achieved results and effects:



As a result of the project, reclamation of 12.15 ha in the villages of Bogomilovo and Hristiyanovo was completed. Drainage ditches and a drainage system have been made to carry away rainwater and leachate, which prevents soil and groundwater contamination. Nine gas wells and static stations were built to dispose of landfill gas by flaring. 225,000 cubic meters of waste were pre-deposited to form a sustainable body of the landfill. All waste is sealed with a clay layer, earth mass and humus. After the completion of the biological reclamation, which is financed by the municipality's budget, the terrain will turn into a pasture.

With the reclamation of the landfill, the restoration of the environment on the territory of the Stara Zagora municipality was achieved, providing protection against the penetration of

surface water into the waste body of the landfill and protection of atmospheric air and surface water from pollution. In this way, the requirements of the regulatory framework for the reclamation of disturbed areas have also been met.

Project: BG16M1OP002-2.009-0037 "Transition to a circular economy through composting in households and in pilot schools in the municipality of Etropole"

Priority Axis: "Waste"

Procedure: BG16M1OP002-2.009 "Implementation of demonstration projects in the field of waste management"

Total value: BGN 377,803.46

Performance period: August 2020 - May 2022

Beneficiary: Etropole municipality

Project objectives: Prevention and reduction of the total amount of solid household waste and, in particular, reduction of the amount of biodegradable household waste throughout the territory of the municipality of Etropole.

Completed activities: Two main activities were carried out:

(1) *Creation of a Demonstration Program "Composting and Zero Waste"* in two pilot schools: Two green classrooms are equipped with teaching aids for introducing the Demonstration Education Program; Demonstration composting systems have been created in the schoolyards (2 composters with a capacity of 400 l and 1200 l are located in "Hristo Botev" Primary School, 3 composters are located in Secondary School "Hristo Yassenov" (2 pcs. of 1200 l. and one of 400 l.). Students, teachers and parents together participate in the separate collection and prevention of solid household waste generation.

(2) *Introduction of a composting system in households in 7 villages in the municipality of Etropole:* 200 households on the territory of the villages in the municipality were provided with composting containers in order to promote home composting; Household composting manuals have been prepared and trainings have been conducted for the persons who will use the composting containers.

Achieved results and effects:



A demonstration education program has been introduced in the two pilot schools. Students and their parents are motivated and supported in separate waste collection and composting activities. A Home Composting Program has been launched. A total of 6 campaigns were carried out to popularize the results of the project through information events, in the local media and on the website of the municipality practice.

The actual activities were preceded by a survey of households' attitudes towards composting. The project is addressed to young people and their families. Students from 1st to 8th grade are introduced to the ways of composting and prevention of waste generation, thereby creating attitudes to change behavior towards separate collection and prolonging the life of separately collected waste.

The combination of practical composting activities and the provision of the necessary equipment, supported by training and motivation, creates the conditions for a sustainable change in behavior towards waste management at the local level. The created training and audio-visual materials and manuals for teachers will be able to be used in the future. The same goes for the two interactive "green classrooms" and the Composting Class Demonstration Program.



Project: BG16M1OP002-3.007-0007 "Improving the environmental protection status of species and types of natural habitats on the territory of Protected Zone BG0000209 "Pirin" for the protection of natural habitats and wild flora and fauna

Priority Axis 3: NATURA2000 and biodiversity

Procedure: BG16M1OP002-3.007 Improvement of the nature conservation status of species and types of natural habitats on the territory of the Natura 2000 network falling into national parks, natural parks and maintained reserves

Total value: BGN 6,374,748.70

Performance period: August 2018 - June 2023

Beneficiary: Directorate "National Park Pirin" (DNP Pirin)

Objectives of the project: 1) Improving the condition of forest habitats; 2) Improving the condition of oligotrophic lakes; 3). Improving the conservation status of natural habitats and species.



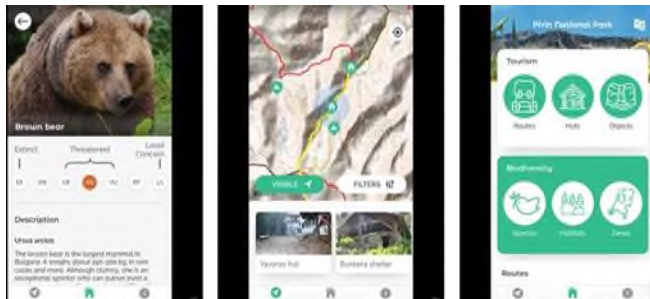
Completed activities: Within the framework of the project, construction and strengthening activities aimed at combating pests on the branches and stems - bark beetles (to improve the condition of forest habitat 9410 - Acidophilic Picea forests in the mountain to alpine belt) and improving the nature conservation status of oligotrophic lakes and dystrophic lakes. The movement of people and vehicles on certain sections of the road infrastructure has been regulated and sections of the tourist routes have been rehabilitated in order to prevent and fight fires and improve the nature conservation status of habitats. By building a system for recording shots in the "Pirin" protected area, the good conservation status of the wild goat and brown bear species is ensured. A mobile electronic application with information on the regulated routes for the territory in the Pirin protected area has been prepared, which also contributes to improving the nature conservation status of species and natural habitats.

Achieved results and effects:

The implementation of the project is one of the opportunities for DNP Pirin to fulfill its mission of protecting biological diversity. Prerequisites have been created for better implementation of the tasks of preserving the flora and fauna, reducing the risk of fires and poaching and improving the conservation status of plant and animal species. The newly built infrastructure limits erosion and prevents illegal activities in the protected area. The risk of fires has also been reduced, as access for firefighting equipment to higher places on the mountain has been improved. The mobile electronic



application is used by tourists, whose number has visibly increased.



The overall effect of the project is in the general improvement of a number of forest and natural habitats and species, and also in limiting the impact of human activities on these habitats and species.

Project: Improving the conservation status of natural habitat 9560* Endemic forests of Juniperus spp. in the Izgoryaloto Gyune maintained reserve and stopping the loss of habitat area by eliminating the adverse impact of erosion, landslide processes and anthropogenic threats identified in the NR Management Plan

Priority Axis: Natura 2000 and biodiversity

Procedure: BG16M1OP002-3.007 Improvement of the nature conservation status of species and types of natural habitats on the territory of the Natura 2000 network falling into national parks, natural parks and maintained reserves

Total value: BGN 285,932.94

Performance period: January 2019 - September 2020

Beneficiary: Regional Inspection of Environment and Water - city of Plovdiv

Project goals: The project aims to improve the nature conservation status of the habitat in the maintained reserve "Burnt Gune" and stop the loss of area from it, including the protection of part of the second largest in Bulgaria juniper tree deposit. The focus is on erosion, as one of the main threats to habitat identified in the Reserve's Management Plan. As a result of developed collapse processes, large pieces of rock masses are falling from the area of the NR, which directly reduces the area of the habitat and destroys juniper trees.

Completed activities: Construction and installation activities for drainage of eroded areas in the reserve have been carried out and the main reasons for activation of erosion and collapse processes have been removed. Since the reserve is subject to the adverse effects of fires, logging, firewood collection, cattle grazing, etc., which prevent the natural regeneration of juniper trees, its boundaries are marked by clear and permanently visible terrain signs. Illegal logging and grazing and unregulated encroachment and trampling of the habitat have been stopped.



Fire prevention signs were made and installed and informational materials were compiled and printed (a handbook and a fire leaflet). The reserve's fire station has been equipped, and the reserve's volunteer fire department has been trained to respond to crisis situations to protect the reserve.

Achieved results and effects As a result of the project, the nature protection status of the Izgoryaloto Gyune



Reserve has been improved. Through the constructed drainage ditches, the erosion and collapse processes have been prevented in the long term and the loss of area from the juniper tree habitat has been stopped. This has a positive sustainable impact on the juniper tree population in the reserve, as it limits the negative impact of geodynamic processes on the forest habitat and maintains the good condition of the habitat.



The information campaign and trainings carried out among the local population have raised awareness of the importance of protecting the maintained reserve and the juniper tree habitat. As a result of the acquired knowledge and the clear marking of the boundaries of the reserve, after the completion of the project, no illegal activities were detected on its territory.

Project: BG16M1OP002-4.003-0001-C02 "Prevention and counteraction of landslide processes along the republican road network - Phase 1"

Priority Axis: "Flood and Landslide Risk Prevention and Management"

Procedure: BG16M1OP002-4.003 Prevention and counteraction of landslide processes to limit their risk (including along the republican road network)

Total value: BGN 2,449,327.34

Performance period: May 2018 - September 2020

Beneficiary: Road Infrastructure Agency



Project goals: Implementation of activities in landslide areas with a view to protecting the life and health of the population, the infrastructure and the environment and preventing the risk of landslide processes.

Completed activities: Activities related to preventive actions/measures have been carried out at sites that have been identified as one of the most urgent, prioritized as such according to approved Methodology adopted by Order No. RD 02-14-1390/17.12.2015 of the Minister of Regional development and public works. The main tasks are aimed at

the implementation of construction and assembly works for geoprotection measures, with the aim of preventing landslide processes that occurred on part of the republican road network, namely: Site "Road II-14 "O.p. Vidin - Kula - Vrashka Chuka - border Republic of Bulgaria", at km 10+100 and Site "Road III-1306 /(Knezha - Iskar) - Glava - Koinare - Chomakovtsi - Lepitsa - Gabare - Varbitsa - Virovsko - Tishevitsa - Gorno Pestene - (Vratsa - Borovan)", at km 62+000.



Achieved results and effects: The project has a direct contribution to limit the landslide processes of the included high-risk sites, located on the territory of the Republican road network with reg. No. VID09.03280.01 and VRC10.12259.02.

This ensures protection of life and health of the population, infrastructure and environment and prevention of the risk of landslide processes and heavy human and material losses.



Project: No. BG16M1OP002-4.001-0001 "Centers for increasing the preparedness of the population for flood response "

Priority Axis 4: Flood and landslide risk prevention and management

Procedure: BG16M1OP002-4.001 Establishment of six centers to increase the preparedness of the population for an adequate response to floods and subsequent crises

Total value: BGN 37,687,802.49

Performance period: 20.07.2016-30.06.2024

Beneficiary: Directorate General "Fire Safety and Protection of the Population" - Ministry of the Interior

Objectives of the project: The project is aimed at the development of a unified model for building capacity for population actions in the event of floods and subsequent crises. The main objective is to increase the capacity at the national level to act on floods and subsequent crises by creating and developing the necessary infrastructure and a methodological framework for preparing the population for protection and response to crises. In this sense, the project has a wide range of target groups: students; persons over the age of 60; population of working age; volunteers; municipal administrations; and media.



Completed activities: 6 regional training centers have been renovated and equipped. The experience and good practices of two EU member states are studied. The teaching staff in the six centers received training and appropriate methodological materials. A series of trainings adapted to the specifics of each target group were conducted. The trainings are concluded with final simulation exercises in centers with

representatives of all groups of trained participants.

Achieved results and effects: 6 regional training centers have been established with trained personnel who will continue to work on increasing the capacity of volunteers, citizens and employees of the Ministry of the Interior. Over 90,000 people have participated in flood risk prevention and management measures. A comprehensive model has been developed to increase the capacity of the population at national and regional level to respond to floods and subsequent crises, and

a follow-up strategy has been created. The project is innovative not only for Bulgaria, but also for the countries of the Balkan Peninsula.



Project BG16M1OP002-5.003-0001-C03 Improving the quality of atmospheric air in the Municipality of Sofia by replacing solid fuel heating devices with ecological alternatives

Priority Axis 5: Improving the quality of atmospheric air

Procedure: No. BG16M1OP002-5.003 "Measures to improve atmospheric air quality";

Total value: BGN 44,303,839.69

Performance period: April 2019 – March 2024

Beneficiary: Sofia Municipality

Objectives of the project: To improve the quality of the atmospheric air in the Sofia Municipality by reducing the emissions of fine dust particles by replacing solid fuel heating devices of households with ecological alternatives.



Completed activities: An explanatory campaign was conducted for the citizens of the Sofia Municipality and their attitudes towards replacing their wood and coal heating devices with pellet ones or replacing them with air conditioners were studied. A vision for the approach to such replacement is drawn up and a mechanism for prioritizing investments (in rehabilitated buildings), revenues from the delivery of replaced heating devices and average/marginal unit prices for the different alternative forms of heating are planned. Based on the stated needs, the delivery and

installation of the alternative ecological heating devices were assigned.

Achieved results and effects: The supported activities have a measurable effect on the air quality in the municipality. The differences are reported by pollution measuring stations (40 mg before vs. 30 mg now). In this sense, the benefits of the project (contribution to the reduction of the amounts of FPM10 and nitrogen oxides) affect more than 1.3 million inhabitants. In the short-term program of the Sofia Municipality for renewable energy sources, it is reported how much carbon emissions have been saved.

In addition to the direct ecological benefits, expressed in the amount of emissions saved FPCH10, there are also socio-economic benefits related to protecting the health and increasing the quality of life of the residents of the Sofia Municipality, improving working and recreation conditions, including for the guests of the municipality and increasing public awareness and sensitivity on air quality issues.

Sofia Municipality plans future measures that contribute to **the sustainability of the supported activities:** from 2025, the use of solid fuel heating devices will be prohibited in the central part of the city, and from 2029, the ban will cover the territory of the entire municipality. Citizens will be informed in a timely manner with various information campaigns. Measures are planned to renew the urban environment in order to eliminate the mud spots. The information system created for the project, which facilitates its implementation and the creation of a map for the territory of the entire municipality, where the potential final beneficiaries are indicated, can be cited as **good practices**.



Project: BG16M1OP002-5.004-0003 "Improving the quality of atmospheric air in the Municipality of Burgas through the modernization of public transport"

Priority Axis: Improving the quality of atmospheric air

Procedure: BG16M1OP002-5.004 "Measures to address transport as a source of atmospheric air pollution"

Total value: BGN 60,991,380.88, of which GA: BGN 59,106,747.21 and own financing in the amount of BGN 1,884,633.67.

Performance period: November 2019-December 2022

Beneficiary: Municipality of Burgas with partner Burgasbus EOOD

Objectives of the project: The project aims to contribute to better air cleanliness in the Municipality of Burgas through the supply and operation of electric buses for urban transport.

Completed activities: The following types of vehicles and additional equipment were delivered: 10 new 18-meter articulated electric buses; 34 new 12-meter electric buses; 12 new 9 meter electric buses; charging stations and associated infrastructure and additional equipment and integration to existing public transport management systems. Equipment for an electronic ticketing system, automatic vehicle positioning and a real-time passenger information system have been put into operation. The



equipment is required for public transport management systems, providing the following functionalities: GPS positioning and two-way communication with the dispatch center of the public transport operator, validators and driver console for electronic billing, information displays in the passenger compartment and audio system. The number and capacity of charging stations ensure



simultaneous charging of all delivered buses and have a monitoring and diagnostics system for each charging point and vehicle.

Achieved results and effects: With the purchase of the new electric vehicles, it is expected to reduce atmospheric air pollution with FPM10 and NOx, as well as a reduction of noise and vibrations in the environment. Another effect of the implementation of the project is the increase in energy efficiency. The improved quality of services is expected to lead to a reduction in the use of private cars, which will help to reduce atmospheric air pollution, and hence to improve the quality of life.

There are also other positive effects related to improving the functionality and service in urban transport. The new electrobuses pass through the center of Burgas and are equipped with systems for integrated management of public transport in the city. They are designed to ensure the service of the busiest routes of the transport scheme of Burgas, including fast bus lines. The additional number of buses leads to a reduction of service intervals on the respective lines, as well as provides a mobility model entirely based on environmentally friendly vehicles in socially important areas of the urban core. With the increased capacity of the rolling stock, the scope of the municipal transport scheme has been expanded, serving new urbanized areas on the city periphery.



Project: BG16M1OP002-6.002-0016 "Activities to promote OPE 2014-2020 in 2021-2022."

Priority Axis: "Technical Assistance"

Procedure: BG16M1OP002-6.002 "Technical assistance for management and implementation of operational program "Environment 2014-2020."

Total value: BGN 2,400,000.00

Performance period: August 2021 - April 2024

Beneficiary: MOEW, Directorate General "Operational Program Environment", Department "Coordination, Communication and Technical Assistance"

Project goals: to increase the awareness of the general public, the media, beneficiaries, businesses, non-governmental organizations, etc. about the possibilities and priorities of the OPE 2014-2020, the Partnership Agreement, as well as the public recognition of the EU's role in the development of the regions.

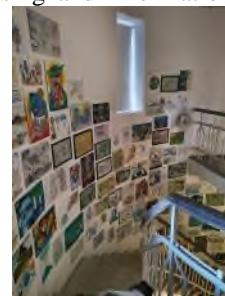
Completed activities: Information and publicity activities of OPE 2014-2020 were carried out in fulfillment of the annual action plans. Activities include the production and distribution of advertising and information materials; creation of audio and video clips; sociological surveys; administration of the OPE website.

Logistic support for events of different formats (discussions, information days and campaigns, trainings, forums, round tables, conferences, exhibitions, competitions, etc.) has been carried out.



An educational and informational campaign of OPE in 2021 and 2022 was implemented through the production and distribution of video lessons dedicated to the priority axes of OPE 2014-2020: Water, Waste, Air, Biodiversity, and Flood and Landslide Risk Prevention. Two sociological surveys on public awareness of the program have been conducted and a third is being prepared.

Particularly popular are initiatives involving interactivity and creativity, such as *the Green Olympics* (2021); the art project "*Inhabitants: in search of a better environment*" (started in 2022), the national competition "*Compose a treatment plant*" (with the participation of over 1000 students from 4th to 12th grade from 100 settlements)



Achieved results and effects:



The main effects of the project are expressed in increasing the awareness of the progress of the program and the transparency of management decisions. Given the stage of the programme, the focus of information and communication activities is on results and good practices, with the general public and young people being the priority target groups.

We are looking for the formation of ecological awareness among citizens in

view of better sustainability of the measures taken, supported by the OPE 2014-2020.

As a result of the implementation of the project, awareness among the general public about the program and about the contribution of ESIF has increased. Overall, the project contributes to increasing public confidence.

