

# Bulgaria

*As of 30 September, Bulgaria **did not submit its final updated NECP.***

AMBITION						
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	Target/ Contribution	M**	M	34.10%	12.4	8.42
	WAM***	21.73	-9.50	34.47%	13.22	8.85
<b>2024 final NECP (2030)</b>	Target/ Contribution	N/A	N/A	N/A	N/A	N/A
<b>EU targets/ benchmarks (2030)*</b>		20.1	-9.72	33%	13.71	8.25

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

\*\*In the 2023 draft NECP the ESR target is missing, but in the most updated version of the draft NECP the ESR target is -10%, thus 20.1 MtCO<sub>2</sub>

\*\*\* WAM values refer to the most updated draft version of June 2024

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

## 1. NECP ambition towards 2030 targets

*The data and analysis of this section refer, where possible, to the latest draft updated NECP made available during public consultations in June 2024.*

The last available draft of the Bulgarian NECP update, made available during public consultations in June 2024, is not ambitious enough to align with Paris Agreement commitments, and not even with all EU 2030 climate targets and energy benchmarks.

Even with the latest WAM scenarios, the Bulgarian draft NECP update fails to meet the EU 2030 **climate targets** for emissions reduction in both the non-ETS and LULUCF sector. The sectoral scenarios themselves look unconvincing, as they over rely on the absorption capacity of carbon sinks (LULUCF), as well as on market forces and business initiatives, while being supported by just a few scattered measures (or no measure at all). An example is the transport sector, where objectives

appear unrealistic considering the registered constant increase in emissions despite all the implemented measures and spendings for the last 10 years and the lack of new consistent measures which can lead to significant change in the current pattern.

For **energy**, the most significant improvement of the June 2024 version, compared to previous drafts, is on **renewables**. The 2030 target for renewables in final energy consumption is higher than the EU benchmark (34.10% compared to 33%). The target for renewables in electricity generation was also significantly improved (55.6% in the June 2024 version, compared to 42% in the 2023 draft and 30,33% from 2019 NECP). Regarding **energy efficiency**, Bulgaria is in line with the minimum EED obligations for primary and final energy consumption, but it fails to align with the most ambitious result of the formula for final energy consumption. This should be adjusted in the final version. For primary energy consumption, Bulgaria pledges a more ambitious contribution than the most ambitious result of the formula.

However, the plan still includes several gaps and missed opportunities for the energy transition, including:

- The renewables share in the heating and cooling sector has decreased compared to previous drafts (from 45.5% to 43.5%) without any explanations.
- The lack of recognition of the role of energy communities (notably for heating and cooling) and of Bulgaria’s involvement in the Net Zero Government Initiative.
- The lack of phase out plans for fossil fuels, and even the denied existence of fossil fuel subsidies, due to be phased out by 2025.
- The planned increase in nuclear capacity which, given the expected expansion of renewables, would be unreasonable and unprofitable.

**Quality of data in the latest draft NECP update (June 2024)** – The latest available draft of the Bulgarian NECP includes targets or scenarios for several NECP tracker indicators. However, several gaps and inconsistencies exist. The plan does not clearly report both gross and net GHG emissions scenarios, as well as the ETS and binding non-ETS contribution, all of which had to be derived from graphs or formulas. Scenarios for the energy, industry, buildings and transport sectors show significant misalignments with the EEA and Eurostat datasets used in this report to retrieve historical data. Such misalignments may depend on differences in scopes or data sources. This makes it difficult to assess the ambition and, in the future, the implementation of the plan.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
N/A	N/A		N/M	N/A

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
	N/M	N/A	N/M		N/A

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Bulgaria was not fully on track to implement its old 2019 NECP (especially in the transport sector), which is now obsolete in terms of ambition.

*Climate indicators (GHG emissions reductions):* In the majority of cases, it is not possible to track the implementation of the Bulgarian 2019 NECP when it comes to emissions reduction trajectories. Several targets and/or scenarios are missing or difficult to retrieve in the 2019 NECP – including for overall net and gross emissions – while many others have scopes that differ significantly from the EEA dataset that was used to retrieve historical data for the NECP tracker. Nonetheless, it appears that Bulgaria is lagging behind in the LULUCF and agriculture sector, while the transport sector emissions are well above the projected peak of emissions.

*Energy indicators:* In 2022, Bulgaria was on track with the 2019 NECP trajectories for final energy consumption, but not on primary. Primary energy consumption has experienced a worrying upward trend in the years after the pandemic. Trends in renewables shares in both the electricity and energy mix also raise concerns. The share of renewables in electricity generation only initially was on track, but then decreased from 23.6% to 20.23%; identically the share of renewables in final energy consumption initially overachieved the target for 2020, then it plummeted, putting Bulgaria off-track compared to the 2019 NECP projections.