**ASSESSMENT**

on the compatibility of the types of measures to be financed under the Programme “Transport Connectivity” 2021-2027 with the principle of ‘do no significant harm’ to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852

**May, 2022**

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# INTRODUCTION

The *ASSESSMENT ON THE COMPATIBILITY OF THE TYPES OF MEASURES TO BE FINANCED UNDER THE PROGRAMME “TRANSPORT CONNECTIVITY” 2021-2027 WITH THE PRINCIPLE OF ‘DO NO SIGNIFICANT HARM’ TO ENVIRONMENTAL OBJECTIVES WITHIN THE MEANING OF ARTICLE 17 OF REGULATION (EU) 2020/852* has been prepared taking into account and integrating the following basic normative and methodological guidelines:

* The requirements of the Preamble (10), Article 9 *and Annex I ‘Measurements and codes for types of intervention for the ERDF, the ESF +, the Cohesion Fund and the JTF — Article 22 (5)’of Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy (General Regulation);*
* Article 17 of *Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (Taxonomy Regulation);*
* *Technical guidance on the implementation of the ‘do no significant harm’ principle under the RRF Regulation (2021/С 58/01)*;
* *Commission illustrative note “Application of the “do no significant harm” principle under co-financing policy (EGESIF\_21-0025-00, 17/09/2021).*

# Priority 1 "Development of the railway infrastructure along the 'core' and 'comprehensive' Trans-European Transport Network"

## Measure: Construction, modernization, rehabilitation, electrification and deployment of signaling and telecommunications of railway sections along the "core" and “comprehensive” Trans-European Transport Network

It is envisaged, within this priority and measure, to finance investment projects for:

* completion of the modernization of the Elin Pelin-Kostenets railway section;
* completion of Voluyak – Dragoman railway section;
* modernization of the Sofia-Pernik and Pernik-Radomir railway sections;
* establishment of a railway connection between Bulgaria and Northern Macedonia;
* completion of the facilities along the Karnobat-Sindel railway line;
* deployment of Level 1 ERTMS on lines beyond the above mentioned.

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

|  |  |  |  |
| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change |  | Х | The measures are eligible for intervention fields number 096 (Newly built or upgraded railways - TEN-T core network) and 101 (Reconstructed or modernised railways - TEN-T comprehensive network) under Annex I to Regulation (EU) 2021/1060 with a coefficient for calculation of support to climate change objectives 100%.  The objectives of the measures and the nature of the intervention types help to achieve the environmental objectives by ensuring better conditions for shifting freight and passenger transport from road to rail, which will help reduce greenhouse gas emissions from road transport. They directly support the goal of effective connectivity by removing bottlenecks and by promoting the efficient and sustainable use of railway infrastructure at the expense of road transport. In addition, the railway infrastructure is electrified and promotes the use of environmentally friendly transport and as such can be considered a necessary investment in the transition to an efficient climate-neutral economy. Regardless of the development alternatives chosen, rail transport has no share in the calculation of carbon volumes.  The measure also contributes to some extent to increasing clean or climate-neutral mobility. |
| Adaptation to climate change |  | Х | The activities are not expected to have a greater detrimental effect on the current and expected future climate, on the measures themselves or on people, nature or assets, as they are aimed at improving the conditions for sustainable and efficient use of rail transport and will contribute to improving the resilience of infrastructure to the long-term effects of climate change, incl. increasing safety for the population, nature and tangible assets. In this sense, the measure has a rather positive contribution.  In view of climate change, railway infrastructure needs to be gradually adapted to more severe weather conditions. Through the modernization of the existing facilities and the construction of new adjacent ones, and the rehabilitation or replacement of the existing equipment, the goals of a complete modern railway network with better resilience to climate change are expected to be achieved.  In preparing the design the climatic characteristics of the area, including wind, precipitation, snow cover, temperatures and more were/will be taken into account when determining the technical parameters of the facilities, which are set in the technical specifications for implementation. Moreover, the individual detail design for each project envisages drainage and fortification facilities in accordance with climatic factors and based on updated national design guidelines. This requirement corresponds to the measures provided for in the National Strategy for Adaptation to Climate Change and the Action Plan for the Transport Sector. Based on this, the measure is expected to be resilient to the effects of climate change.  In addition for the investments within the measure, which are above the value of EUR 10 million, a climate vulnerability and risk assessment is planned, leading to identification, appraisal and implementation of relevant adaptation measures. |
| Sustainable use and protection of water and marine resources | Х |  |  |
| The circular economy, including waste prevention and recycling | Х |  |  |
| Pollution prevention and control to air, water or land | Х |  |  |
| The protection and restoration of biodiversity and ecosystems | Х |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | Slightly predictable impact is possible when crossing rivers, as the impact is local, around the crossing point. The impact is associated with minor morphological changes in riverbeds and banks, whereas this impact is controllable and limited by measures prescribed by the competent authorities in the framework of the ongoing Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) procedures. In addition, when a water body is affected, the activity is subject to a permit regime under the Water Act, which also imposes measures to protect water bodies and prevent deterioration of their ecological status.  The impact on the ecological status of groundwater could be temporary, short-term, localized in the area of construction activities, with insignificant foreseeable impact, only in case of reaching shallow groundwater levels. To eliminate these consequences, the projects are accompanied by hydrogeological studies, on the basis of which, in case of risk of adverse effects on groundwater, technical solutions are proposed in order to prevent deterioration of water bodies.  During operation, the impact is expected only in the sections of the bridges and it is insignificant in degree, local, and could not lead to deterioration of the ecological potential of surface water bodies.  According to the Strategic Environmental Assessment (SEA) report of the draft Transport Connectivity Programme (TCP) 2021-2027, the implementation of the measures is not associated with a significant negative impact as concerning the environmental objective and in compliance with the measures of the EIA decisions.  In addition, through the EIA and AA procedures for each specific project, it is guaranteed that only projects that are in line with the Bulgarian River Basin Management Plans (RBMPs), Flood Risk Management Plans (FRMPs) for the territories and Marine Strategy are approved and are not expected to harm the good status and ecological potential of bodies of surface and groundwater or the good ecological status of marine waters when they are implemented. In this respect, the measure is considered to comply with the principle of “do no significant harm”.  The projects are not related to marine waters. |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | Х | The measures are eligible for intervention fields number 096 (Newly built or upgraded railways - TEN-T core network) and 101 (Reconstructed or modernised railways - TEN-T comprehensive network) under Annex I to Regulation (EU) 2021/1060 with a coefficient for the calculation of support to environmental objectives 40%.  The activities envisaged for implementation are planned to be performed on sites where elements of the railway infrastructure are currently located.  Related to waste generation are mainly construction activities, whereas it is envisaged to limit the generation of waste during construction works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction project, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste Management Plan, which obligatory contains a part with measures for prevention, measures for separate collection and measures for reuse of the construction wastes.  The measure is not related to waste incineration. The activities are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of their life cycle or to cause significant and long-term environmental damage with respect to the circular economy.  With respect to this the measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle, therefore it is considered to be in line with the principal of “do no significant harm”. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? | Х | The measure is not expected to lead to a significant increase in pollutant emissions in the air.  The measure is in connection with the objectives of the national policy for action on climate change and the need to diversify transport and increase the share of electric transport.  Emissions in the air are expected only during the construction phase – they are local, temporary, insignificant, completely reversible. Their quantity will be minimized with implementation of mitigation measures for reducing of the dust generation.  The project activities aim to improve the technical and operational condition of the railway line and the accompanying infrastructure and creation of new facilities, through which the conditions for the reorientation of passenger and freight transport to railway transport, which has the lowest percentage of emissions of harmful substances in ambient air and of greenhouse gases compared to the other modes of transport.  Regarding water pollution - the impact is insignificant and reversible, associated with the deposition of insignificant amounts of dust and gas emissions during construction. During the operation there is no impact on the water, except for some repair works - the degree is insignificant, the impact is reversible - similar to the construction stage.  With regard to soils, the impact is not related to soil contamination in the normal course of activities (as for the prevention of accidents with construction and transport equipment, preventive measures are applied in accordance with the Emergency Action Plan; maintenance, including refueling with fuel, oil change, repair works on construction and transport equipment are not carried out within the construction sites, but only in specialized car services) - for each terrain with a soil layer, there is a regulated requirement, in the presence of humus, to separate it from the rest of the earth and to use it for its intended purpose - for reclamation and prevention of erosion processes in the disturbed terrains of the transport infrastructure.  In this respect, the measure is considered to respect the principle of “do no significant harm”. |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? | Х | Environmental Impact Assessments and Appropriate Assessments were carried out for most of the projects under this measure. For all such projects for which the EIA and AA procedures have already been completed, additional analyzes will be assigned as to whether each AA complies with and adequately evaluates the specific conservation objectives for the respective protected area(s). Depending on the results of these analyzes, if necessary (if gaps in the AA reports are identified regarding the assessment of the impact on the conservation objectives), these assessments will be revised.  In the EIA Decisions for approval of the projects there are mitigation measures for the expected impacts on biodiversity and Natura 2000 protected areas that will be implemented during the realization of the projects and that ensure the control and prevention of the impact to the permissible limits.  Some of the activities will be carried out on already urbanized territories owned by the NRIC.  For the rest of the sub-measures, an EIA and AA will be carried out in accordance with EU and the national environmental legislation, as AA will be done based on site-specific conservation objectives.  The AA procedures and the implementation of the mitigation measures, resulting from these procedures, shall ensure that the approved activities / projects do not lead to a significant deterioration of the health and resilience of ecosystems or to the deterioration of the conservation status of habitats and species, including those of Union interest. In this respect, the measure is considered to respect the principle of “do no significant harm”. |

# Priority 2 „Development of the road infrastructure along the 'core' Trans-European Transport Network and road connections“

## Measure: Construction and modernization of sections of road infrastructure along the "core" Trans-European Transport Network

The envisaged projects are for construction of :

* Bypass of the town of Gabrovo, including a tunnel under Shipka peak
* Ruse-Veliko Turnovo Highway
* Struma Highway Lot 3.2

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

|  |  |  |  |
| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change | X |  |  |
| Adaptation to climate change |  | Х | The measures are eligible under Annex I to Regulation (EU) 2021/1060, for field of intervention, with number 058 Adaptation to climate change measures and prevention and management of climate related risks: floods and landslides, with a coefficient for calculation of support to climate change objectives 100%.  The activities are not expected to have a greater detrimental effect on the current and expected future climate, on the measures themselves or on people, nature or assets, as they are aimed at improving road infrastructure conditions and improving their resilience to the effects of change. of the climate in the long term, incl. increasing safety for the population, nature and tangible assets.  The proposed activities support the implementation of the measure provided for in the National Strategy for Adaptation to Climate Change and the Action Plan for the Transport Sector, related to the implementation of a program to strengthen the resilience of the road network to extreme weather events. The modern ways for design and construction, according to updated standards, counteracts floods and landslides, whereas for the projects within the measure it is provided:   * Actions for adaptation to climate change in the scope of the projects for Ruse - Veliko Tarnovo Motorway (Ruse - Byala section; Byala bypass and Byala - Veliko Tarnovo section) and Gabrovo bypass from km 20+124.50 to km 30+673.48, including the tunnel under Shipka Peak, are mainly related to the response to floods and landslides. These include measures to ensure the drainage of the road body and the roadway and measures to strengthen the road body and the construction of fortifications in order to ensure the sustainability of the road infrastructure. Massive reinforced structures are used in the construction of the bridge structures. The preparation of technical projects (in which all activities and works will be specified in detail), including those related to adaptation to climate change) and the implementation of construction and installation works are forthcoming and are subject to the projects under the priority; * Actions for adaptation to climate change in the scope of the project for Struma Motorway Lot 3.2 are mainly related to the response to floods and landslides. These include measures to ensure the drainage of the road body and the roadway and measures to strengthen the road body and the construction of fortifications in order to ensure the sustainability of the road infrastructure. Massive reinforced structures are used in the construction of the bridge structures. The preparation of technical projects (in which all activities and works will be specified in detail), including those related to adaptation to climate change) and the implementation of construction and installation works are forthcoming and are subject to the projects under the priority.   In this respect the measure makes a positive contribution to achieving resilience to the effects of climate change. |
| Sustainable use and protection of water and marine resources | Х |  |  |
| The circular economy, including waste prevention and recycling | X |  |  |
| Pollution prevention and control to air, water or land | Х |  |  |
| The protection and restoration of biodiversity and ecosystems | Х |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Mitigation of climate change:* Is the measure expected to lead to significant GHG emissions? | X | The measures have a negligible foreseeable impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle due to the following:   * The measure is not expected to lead to significant GHG emissions, as the new roads partially are overlapping the existing one or are connectivity extensions of existing traces. * The development of the road infrastructure along the Trans-European Transport Network to remove „bottlenecks“ and to construct missing connections will have a positive effect on improving traffic and optimal speed of the vehicles, shorter journeys, as a result of which GHG emissions will be significantly reduced. * The projects will be implemented at the same time as the implementation of measures for building of charging stations for electric cars along the national road network. * When announcing public procurements for selection of designers and contractors of the projects, the EU Criteria for environmentally friendly public procurement for design, construction and maintenance of roads are applied, in order to reduce greenhouse gas emissions due to fuel consumption during the use of the road and the use of resources for the production of construction materials.   Therefore, the measures is considered to respect the principle of “do no significant harm”. |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | Slightly predictable impact is possible when crossing rivers, as the impact is local, around the crossing point. The impact is associated with minor morphological changes in riverbeds and banks, and this impact is controllable and limited by measures prescribed by the competent authorities in the framework of ongoing EIA and AA procedures. In addition, when a water body is affected, the activity is subject to a permit regime under the Water Act, which also imposes measures to protect water bodies and prevent deterioration of their ecological status.  The impact on the ecological status of groundwater could be temporary, short-term, localized in the area of construction activities, with insignificant foreseeable impact, only in case of reaching shallow groundwater levels. To eliminate these consequences, the projects are accompanied by hydrogeological studies, on the basis of which, in case of risk of adverse effects on groundwater, measures are proposed in order to prevent deterioration of water bodies.  During operation, impacts are expected only in the sections of bridges, as they are insignificant, local, and could not lead to deterioration of the ecological potential of water bodies as a minimal part of transport emissions are deposited on surface water bodies. Groundwater is not affected during the road exploitation phase.  According to the conclusions of the reports on the Strategic environmental assessment of the draft Programme Transport Connectivity 2021-2027 and the Integrated Transport Strategy until 2030, the implementation of the measures is not associated with significant negative impact on the environmental objective in compliance with the measures of the EIA decisions.  In addition, through the EIA and AA procedures for each specific project is guaranteed that only projects that are in line with the Bulgarian River Basin Management Plans (RBMPs), Flood Risk Management Plans (FRMPs) for the territories and Marine Strategy are approved and are not expected to harm the good status and ecological potential of bodies of surface and groundwater or the good ecological status of marine waters when they are implemented.  Therefore, the measures is considered to respect the principle of “do no significant harm”.  The projects are not related to marine waters. |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | X | The activity is not related to waste incineration. The measures are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle or to cause significant and long-term environmental damage related to the circular economy.  The measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle. The motives are:  - There is a legal objective for the operators carrying out the road construction to ensure that at least 80 % (by weight) of the construction waste is recovered and at least 10% of the quantity of the reverse embanketments consists from recycled construction materials and construction waste for recovery.  - During the implementation of the projects it is envisaged to include in the tender documents for road construction the requirement for use of recycled construction materials in the construction and utilization of construction waste in embankments, which is in accordance with the National Waste Management Plan until 2028.  - It is envisaged to limit the generation of waste during construction works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction object, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste management Plan.  - The exploitation phase of the projects under this measure do not generate significant waste quantities.  Therefore, and given the nature of the foreseeable impacts, it is considered that the measures respect the principle of “do no significant harm” to the environment. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? | Х | According to the PTC 2021-2027 SEA Report, the overall impact of the implementation of the measure will be related to the reduction of emissions of pollutants into the air from cars, as a result of the improved road infrastructure, which will allow short journeys and will have a direct, long-term and permanent positive impact on air quality compared to the current situation. An additional positive effect that will contribute to compensation of emissions from road traffic are the activities for charging infrastructure for alternative fuels under one of the other priorities of the program.  The emissions on surface water is mainly during the construction of the sites, when the activities are close to surface water bodies or directly affect such - e.g. bridge facilities. During operation, transport traffic is a diffuse source of surface water pollution. The impact is generally negligible, as a minimal part of transport emissions are deposited on surface water bodies. Groundwater is not affected during the operation/exploitation.  The emissions into the water as described above for the environmental water objective, are not significant and do not lead to water pollution.  With regard to soils, the impact is not related to soil contamination in the normal course of activities (as for the prevention of accidents with construction and transport equipment, preventive measures are applied in accordance with the Emergency Action Plan; maintenance, including refueling, oil change, repair works on construction and transport equipment are not carried out within the construction sites, but only in specialized car services) - for each terrain with a soil layer there is a regulated requirement in the presence of humus to separate it from the rest of the earth and to use it for its intended purpose - for reclamation and prevention of erosion processes in the disturbed terrains of the transport infrastructure.  During the operation - pollution of the lands bordering the roadway in case of possible accidents and spills of oil products, use of anti-snow preparations, etc. In order to prevent and minimize such impacts, emergency procedures are applied, as well as instructions for proper use of anti-snow preparations. The impacts are direct, local, slightly negative and reversible.  In addition, noise and vibration from road use will be mitigated by the introduction of noise-protection walls.  For every single project, there are requirements and measures as a result from the EIA procedure that ensure the control and prevention of the possible negative impacts to the permissible limits.  Therefore, the measures are considered to respect the principle of “do no significant harm”. |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? | Х | Environmental Impact Assessments and Appropriate Assessments were carried out for the projects under this measure. In EIA Decisions for approval of projects there are mitigation measures for the expected impacts on biodiversity and Natura 2000 protected areas that will be implemented during the realization of the projects and that ensure the control and prevention of impacts to the permissible limits.    For all projects under this Priority for which the EIA and AA procedures have already been completed, additional analyzes will be assigned as to whether each AA adequately complies with and assesses the specific conservation objectives (SSCOs) for the respective protected area(s). Depending on the results of these analyzes, if necessary (identification of gaps in the AA reports regarding the assessment of the impact on conservation objectives), these assessments will be updated.    For the Struma Motorway project, Lot 3.2, the Commission observation letter of October 2019 details several flaws of the 2017 EIA/AA, which go beyond the lack of SSCO in the light of which the AA should be developed. For this reason, the EIA/AA for Lot 3.2 should be revised, including the thorough analysis of all reasonable alternatives for the Lot 3.2.  The AA procedures and the implementation of the mitigation measures resulting from these procedures shall ensure that the approved activities / projects do not lead to a significant deterioration of the health and resilience of ecosystems or to the deterioration of the conservation status of habitats and species, including those of Union interest. In this respect, once the necessary EIA/AA revisions are ensured, the measure,  will be considered to respect the principle of “do no significant harm”. |

## Measure: Construction, reconstruction and rehabilitation of road connections to the TEN-T network and important economic centers

The measure envisages the implementation of activities for construction, reconstruction and rehabilitation of road connections to the Trans-European Transport Network and important economic centers (transport infrastructure sites, industrial zones, etc.)

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change | Х |  |  |
| Adaptation to climate change | Х |  |  |
| Sustainable use and protection of water and marine resources | X |  |  |
| The circular economy, including waste prevention and recycling | Х |  |  |
| Pollution prevention and control to air, water or land | X |  |  |
| The protection and restoration of biodiversity and ecosystems | X |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Mitigation of climate change:* Is the measure expected to lead to significant GHG emissions? | Х | The measures have a negligible foreseeable impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle due to the following:   * The measure is not expected to lead to significant GHG emissions, as the roads are mostly existing or are connectivity extensions of existing traces. * The development of the road connections to the Trans-European Transport Network and important economic centers is to remove „bottlenecks“ and to construct missing connections, which will have a positive effect on improving traffic and optimal speed of the vehicles, shorter journeys, as a result of which GHG emissions will be significantly reduced. * The projects will be implemented at the same time as the implementation of measures for building of charging stations for electric cars along the national road network. * When announcing public procurements for selection of designers and contractors of the projects, the EU Criteria for environmentally friendly public procurement for design, construction and maintenance of roads are applied, in order to reduce greenhouse gas emissions due to fuel consumption during the use of the road and the use of resources for the production of construction materials.   Therefore, the measures are considered to respect the principle of “do no significant harm”. |
| *Adaptation to climate change:* Is the measure expected to lead to an increased adverse impact of the current climate and the expected future climate, on the measure itself or on people, nature or assets? | Х | The activities are not expected to have a greater detrimental effect on the current and expected future climate, on the measures themselves or on people, nature or assets, as they are aimed at improving road infrastructure conditions and improving their resilience to the effects of climate change in long term, incl. increasing safety for the population, nature and tangible assets.  The proposed activities support the implementation of the measure provided for in the National Strategy for Adaptation to Climate Change and the Action Plan for the Transport Sector, related to the implementation of a program to strengthen the resilience of the road network to extreme weather conditions. The modern ways for design and construction, according to updated standards, counteracts floods and landslides, as in the detail design measures to ensure the drainage of the road body and the roadway and measures to strengthen the road body and the construction of reinforcement facilitites are included, in order to ensure the sustainability of the road infrastructure. In this sense, the measure has a rather positive contribution.  In addition for the investments within the measure, which are above the value of EUR 10 million, a climate vulnerability and risk assessment is planned, leading to identification, appraisal and implementation of relevant adaptation measures. |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | Slightly predictable impact is possible when crossing rivers, as the impact is local, around the crossing point. The impact is associated with minor morphological changes in riverbeds and banks, and this impact is controllable and limited by measures prescribed by the competent authorities in the framework of ongoing EIA and AA procedures. In addition, when a water body is affected, the activity is subject to a permit regime under the Water Act, which also imposes measures to protect water bodies and prevent deterioration of their ecological status.  The impact on the ecological status of groundwater could be temporary, short-term, localized in the area of construction activities, with insignificant foreseeable impact, only in case of reaching shallow groundwater levels. To eliminate these consequences, the projects are accompanied by hydrogeological studies, on the basis of which, in case of risk of adverse effects on groundwater, measures are proposed in order to prevent deterioration of water bodies.  During operation, impacts are expected only in the sections of bridges, as they are insignificant, local, and could not lead to deterioration of the ecological potential of water bodies as a minimal part of transport emissions are deposited on surface water bodies. Groundwater is not affected during the road exploitation phase.  In addition, through the EIA and AA procedures for each specific project is guaranteed that only projects that are in line with the Bulgarian River Basin Management Plans (RBMPs), Flood Risk Management Plans (FRMPs) for the territories and Marine Strategy are approved and are not expected to harm the good status and ecological potential of bodies of surface and groundwater or the good ecological status of marine waters when they are implemented.  Therefore, the measures is considered to respect the principle of “do no significant harm”. |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | Х | The activity is not related to waste incineration. The measures are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle or to cause significant and long-term environmental damage related to the circular economy.  The measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle. The measure will not lead to significant inefficiency in the use of resources, nor to an increase waste generation. The motives are:  - There is a legal objective for the operators carrying out the road construction to ensure that at least 80 % (by weight) of the construction waste is recovered and at least 10% of the quantity of the reverse embanketments consists from recycled construction materials and construction waste for recovery.  - During the implementation of the projects it is envisaged to include in the tender documents for road rehabilitation the requirement for use in the construction of recycled construction materials and utilization of construction waste in embankments, which is in accordance with the National Waste Management Plan until 2028.  - It is envisaged to limit the generation of waste during construction works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction object, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste management Plan.  - The exploitation phase of the projects under this measure do not generate significant waste quantities.  Therefore, and given the nature of the foreseeable impacts, it is considered that the measures respect the principle of “do no significant harm” to the environment. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? | X | According to the PTC 2021-2027 SEA Report, the overall impact of the implementation of the measure will be related to the reduction of emissions of pollutants into the air from cars, as a result of the improved road infrastructure, which will allow short journeys and will have a direct, long-term and permanent positive impact on air quality compared to the current situation. Additional positive effect, which will contribute to the compensation of emissions from road traffic are the activities for charging infrastructure for alternative fuels under one of the other priorities of the program.  The emissions on surface water is mainly during the construction of the sites, when the activities are close to surface water bodies or directly affect such - e.g. bridge facilities. During operation, transport traffic is a diffuse source of surface water pollution. The impact is generally negligible, as a minimal part of transport emissions are deposited on surface water bodies. Groundwater is not affected during the operation/exploitation.  The emissions into the water, as described above for the environmental objective for waters, are not significant and do not lead to pollution of waters.  With regard to soils, the impact is not related to soil contamination in the normal course of activities (as for the prevention of accidents with construction and transport equipment, preventive measures are applied in accordance with the Emergency Action Plan; maintenance, including refueling, oil change, repair works on construction and transport equipment are not carried out within the construction sites, but only in specialized car services) - for each terrain with a soil layer there is a regulated requirement in the presence of humus to separate it from the rest of the earth and to use it for its intended purpose - for reclamation and prevention of erosion processes in the disturbed terrains of the transport infrastructure.  During the operation - pollution of the lands bordering the roadway in case of possible accidents and spills of oil products, use of anti-snow preparations, etc. In order to prevent and minimize such impacts, emergency procedures are applied, as well as instructions for proper use of anti-snow preparations. The impacts are direct, local, slightly negative and reversible.  In addition, noise and vibration from road use will be mitigated by the introduction of noise-protection walls.  For every single project, there are requirements and measures as a result from the EIA procedure that ensure the control and prevention of the possible negative impacts to the permissible limits.  Therefore, the measures are considered to respect the principle of “do no significant harm” . |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? | X | Environmental Impact Assessments and Appropriate Assessments were carried out for the projects under this measure. In the EIA Decisions for approval of the projects there are mitigation measures for the expected impacts on biodiversity and Natura 2000 protected areas that will be implemented during the realization of the projects and that ensure the control and prevention of the impact to the permissible limits.  For all such projects for which the EIA and AA procedures have already been completed, additional analyzes will be assigned as to whether each AA adequately complies with and assesses the specific conservation objectives for the respective protected area(s). Depending on the results of these analyzes, if necessary (identification of gaps in the AA reports regarding the assessment of the impact on conservation objectives), these assessments will be updated.  For the rest of the projects under this neasure, an EIA and AA will be carried out in accordance with EU and the national environmental legislation, as AA will be done based on site-specific conservation objectives.  The AA procedures and the implementation of the mitigation measures resulting from these procedures shall ensure that the approved activities / projects do not lead to a significant deterioration of the health and resilience of ecosystems or to the deterioration of the conservation status of habitats and species, including those of Union interest. In this respect, the measure is considered to respect the principle of “do no significant harm”. |

# Priority 3 “Improvement of intermodality, innovations, modernized traffic management systems, improving transport safety and security”

## Measure: Modernization of terminals and port facilities for loading and transshipment, reconstruction of ports for public transport

For the implementation of these activities, it is envisaged to finance investment projects within this measure for:

* development and expansion of the port of Lom to create conditions for the construction of a multimodal terminal;
* development and expansion of the port of Varna /new quay location/ for multimodal operations;
* building of port facilities (quay walls, quay facilities, flood protection facilities, breakwaters, specialized quay sites for emergency rescue and patrol activities) for efficient and safe inland waterway, sea and intermodal transport (envisaged are building facilities against flooding of Ruse terminal, reconstruction of Lom terminal, reconstruction of port facilities for ballast operations).

**Part 1:**Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change |  | Х | The measures are eligible under the intervention type of ​​Annex I to Regulation (EU) No 2021/1060 number 108 Multimodal Transport (TEN-T) with a coefficient for calculation of support to climate change objectives of 40%.  It can be stated that the measures have a negligible foreseeable impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle due to the following:  - The implementation of the measures will provide an opportunity to build an appropriate infrastructure for alternative fuels, through which ships will have access to clean electricity in the main ports. This is fully in line with the European Green Deal by 2030 (Fit for 55 package), which aims to make EU policies on climate, energy, land use, transport and taxation appropriate to reduce net emissions of greenhouse gases for shipping by 2030 and to provide appropriate infrastructure to allow the use of renewable and low-carbon fuels in maritime transport.  - The development of the port infrastructure will ensure the goals set in the Integrated Transport Strategy until 2030 for the transfer of 30% of freight in road transport to other modes of transport, incl. water, ensuring efficient and environmentally friendly freight corridors in order to reduce greenhouse gas emissions.  - The activities under the measure contribute to the development and transition to water and even more to multimodal / combined transport, which has significantly lower levels of GHG emissions compared to road transport, especially with regard to freight transport.  Therefore, the measures can be considered to respect the principle of „do no significant harm” to the environmental objective. |
| Adaptation to climate change |  | Х | Тhe activities within this measure envisage building of port facilities (quay walls, quay facilities, flood protection facilities, breakwaters, specialized quay sites for emergency rescue and patrol activities) for efficient and safe inland waterway, sea and intermodal transport. Accordimgly, the measure explicitly provides for the financing of activities for infrastructure sustainability and adaptation to climate change.  The measures significantly contribute to the achievement of the environmental objective by providing investments in disaster risk reduction, set as a action priority area in the National Strategy for Disaster Risk Reduction by 2030.  The measure has made a significant contribution to the introduction of interconnection mechanisms between different types of transport in terms of disaster risk reduction, ensuring the implementation of the operational objectives set in the National Disaster Risk Reduction Program until 2025. |
| Sustainable use and protection of water and marine resources | Х |  |  |
| The circular economy, including waste prevention and recycling | Х |  |  |
| Pollution prevention and control to air, water or land | Х |  |  |
| The protection and restoration of biodiversity and ecosystems | Х |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | According to SEAs Reports of the Integrated Transport Strategy by 2030 and Programme Transport connectivity 2021-2027, the impact on waters is mainly local and reversible during the construction phase. During the operation of the facilities, the impact on the condition of surface and groundwater appears to be insignificant, in compliance with the envisaged within the measure activities for prevention of spills of lubricants, fuels, and ballast port facilities.  - The development, expansion or reconstruction of ports for public transport will be carried out in accordance with the applicable environmental legislation;  - An EIA will be carried out, if required, for the projects, included in the measure in accordance with Directive 2011/92/EU and the national environmental legislation – within the EIA procedure every project will be assessed and evaluated in relation with the respective River Basin Management Plan, Flood Risk Management Plan, the Marine Strategy and impact on the water bodies – both surface and groundwater. The risks identified have will be addressed in the design of the measures;  - Some of the projects are in accordance with the National Plan for Development of Combined Transport in the Republic of Bulgaria until 2030, which was subject to Strategic Environmental Assessment (SEA) procedure and according to the results of SEA there are no significant negative impacts on the climate change mitigation;  - Ballast facilities have a positive impact on water, incl. marine waters, as they prevent the pollution of water bodies with the atypical/invasive species and possible other pollutants contained in the ballast. These facilities will ensure the environmentally sound management of ballast water, without the risk of the spread of invasive species and the release of pollutants into water bodies.  Therefore, the measures can be considered to respect the principle of „do no significant harm”. |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | Х | The measures are eligible under the intervention type of ​​Annex I to Regulation (EU) No 2021/1060 number 108 Multimodal Transport (TEN-T) with a coefficient for calculation of support to environmental objectives of 40%.  The activity is not related to waste incineration. The measures are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle or to cause significant and long-term environmental damage related to the circular economy. The measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle.  The operation phase of the projects under this measure do not generate significant waste quantities.  It is envisaged to limit the generation of waste during construction works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction object, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste management Plan.  Significant quantities of primary natural resources are not required for the implementation of the projects, as long as the reconstruction is of a fully existing port infrastructure.  Therefore, and given the nature of the foreseeable impacts, it can be considered that the measures respect the principle of „do no significant harm” to the environmental objective. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? | Х | The impact on the ambient air will be only during the construction activities, in case of excavation and use of bulk materials, but the impact will be insignificant, local and short-lived, completely reversable, and will not affect the overall air quality.  With regard to waters, no significant emissions are expected, leading to water pollution - according to the analysis presented above.  The impact from emissions into water is mainly during the construction of the sites – temporary, local, insignificant and reversible impact. A posistive impact is expected for the areas with significant potential flood risk. Overall, the expected impact is negligible.  With regard to soils, the activities do not involve significant emissions to land and in particular to soils. When carrying out construction activities, the impact on the soils is minimal, as they are already largely damaged - the sites are existing. The impacts are direct, one-time, reversible - given that in places with humus layer there is a legal requirement for the soil layer to be removed before the start of construction work and subsequently used for its intended purpose - for shaping and landscaping of free areas. Reclamation of the disturbed terrains is necessary, which is a required part of the project documentation, which will improve the condition of the soils compared to the current one.  For each project, if necessary, there will be requirements and measures as a result from the EIA procedure that ensure the control and prevention of the possible negative impacts to the permissible limits.  Therefore, it can be considered that the measures respect the principle of „do no significant harm”. |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? | Х | No significant negative impact on protected areas and protected territories is expected, given that the projects are likely to be implemented within urban areas / existing ports. During the construction activities there is a possibility of temporary, reversible, local insignificant impacts.  Positive impact and contribution to the environmental objective is expected from ballast water facilities, which will minimize the cases of unregulated discharge of ballast water into water bodies and the associated spread of invasive species that pose significant risks to local biodiversity.  An EIA and AA will be carried out in accordance with EU and the national environmental legislation, as AA will be done based on site specific conservation objectives.  The AA procedures and the implementation of the mitigation measures resulting from these procedures shall ensure that the approved activities / projects do not lead to a significant deterioration of the health and resilience of ecosystems or to the deterioration of the conservation status of habitats and species, including those of Union interest. In this respect, the measure is considered to respect the principle of “do no significant harm”. |

## Measure: Construction and reconstruction of railway station complexes along the main railway lines

For the implementation of these activities, it is envisaged to finance investment projects within Priority 3 for:

* modernization of key railway stations along the Sofia-Pernik-Radomir railway line;
* modernization of key railway stations and construction of new ones on the railway line Sofia - Serbian border.

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change | Х |  |  |
| Adaptation to climate change | Х |  |  |
| Sustainable use and protection of water and marine resources | Х |  |  |
| The circular economy, including waste prevention and recycling | Х |  |  |
| Pollution prevention and control to air, water or land | Х |  |  |
| The protection and restoration of biodiversity and ecosystems | Х |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Mitigation of climate change:* Is the measure expected to lead to significant GHG emissions? | Х | The implementation of the measures does not have any foreseeable negative impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle.  The construction and reconstruction of railway station complexes will improve the conditions for passengers' access to railway transport, at the expense of the use of road transport. The connection of the station complexes with the other types of transport (metro, air) will be provided, which will improve the intermodality and through it the optimal use of the different types of transport, with minimized impact on climate change.  In addition, the railway infrastructure is electrified and promotes the use of environmentally friendly transport and as such can be considered a necessary investment in the transition to an efficient climate-neutral economy. Regardless of the development alternatives chosen, rail transport has no share in the calculation of carbon volumes. The modernization of the railway lines and the accompanying infrastructure facilities, create better conditions for offering transport services on railway infrastructure, thus contributing to the rerouting of freight and passenger transport from the road transport. This in turn contributes to reducing greenhouse gas emissions.  The implementation of the projects will support measures to increase the energy efficiency of public spaces, introduction of intelligent modern systems for management of passive and active systems for heating, air conditioning, lighting, information, etc., which have an indirect positive effect on climate change.  Therefore, it can be considered that the measures respect the principle of „do no significant harm”. |
| *Adaptation to climate change:* Is the measure expected to lead to an increased adverse impact of the current climate and the expected future climate, on the measure itself or on people, nature or assets? | Х | The life cycle of the assets to be built will exceed 10 years. In this regard, based on current analyzes of climate risk and vulnerability of railway infrastructure to projected climate scenarios, it was found that the sub-measures are stable compared to the forecasts of different climate scenarios. The forthcoming preparation of investment projects will ensure the implementation of specific adaptation solutions for protection the station complexes from flooding and other disasters caused by climate change.  Adaptation decisions do not adversely affect adaptation efforts or the level of resilience of other people's climate-related physical risks, nature, assets and other economic activities.  Therefore, and given their nature, it can be considered that the measures respect the principle of „do no significant harm” for the environmental objective. |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | Given the location and the fact that most of the measure will be implemented in areas with already built railway infrastructure and on the basis of preliminary studies and assessments, it was found that the investments are in accordance with the current River Basin Management Plans (RBMPs) and Flood Risk Management Plans (FRMPs) for the territories.  The impact on waters is mainly local, non-significant at all and reversible during the construction phase. During the operation of the facilities, the impact on the condition of surface and groundwater appears to be insignificant, in compliance with the envisaged measures to prevent spills of lubricants, fuels, etc.  The planned activities are not related to water abstraction and/or use of surface water body, therefore no morphological changes are expected on the riverbanks and riverbeds. The implementation of the projects does not include new physical modifications and does not have an impact that would worsen their ecological condition and potential. The implementation of the activities will not lead to negative changes in the levels of groundwater bodies. Therefore, it can be considered that the measures respect the principle of „do no significant harm” for the environmental objective.  The projects have no relation to the maritime waters. |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | Х | The activity is not related to waste incineration. The measures are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle or to cause significant and long-term environmental damage in regard to the circular economy.  The measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle.  The activities envisaged for implementation are planned to be performed on sites where elements of the railway infrastructure are currently located.  It is envisaged to limit the generation of waste during construction and assembly works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act.  Therefore, and given the nature of the foreseeable impacts, it can be considered that the measures respect the principle of “do no significant harm” to the environmental objective. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? | Х | The measure is not expected to lead to a significant increase in pollutant emissions in the air. Such emissions are expected only during the construction phase – they are local, temporary, insignificant, completely reversible. Their quantity will be minimized with implementation of mitigation measures for reducing of the dust generation.  The project activities aim to improve the railway infrastructure and facilities, through which the conditions for the reorientation of passenger and freight transport to railway transport, which has the lowest percentage of emissions of harmful substances in ambient air and of greenhouse gases compared to the other modes of transport.  Emissions into the water are not expected - the sites are existing and do not affect water bodies.  With regard to soils, the activities do not involve significant emissions to land and in particular to soils. When carrying out construction activities, the impact on the soils is minimal, as they are already disturbed - the sites are existing. The impacts are direct, one-time, reversible - given that in places with humus layer there is a legal requirement for the soil layer to be removed before the start of construction work and subsequently used for its intended purpose - for shaping and landscaping of free areas. Reclamation of the disturbed terrains is necessary, which is a required part of the project documentation, which will improve the condition of the soils compared to the current one.  In this respect, the measure is considered to respect the principle of “do no significant harm”. |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? | Х | The activities are not expected to be implemented in or near biodiversity vulnerable areas, including protected areas of the European ecological network Natura 2000. For the most part, the activities will be carried out on land owned by the NRIC which is already urbanized.  In this regard, the implementation of the projects are not expected to lead to a negative impact on natural habitats and habitats of species subject to protection in protected areas.  If required by the legislation АА procedure will be carried out based on site specific conservation objectives  In this respect, the measure is considered to respect the principle of “do no significant harm”. |

## Measure: Electrification and implementation of signaling and telecommunications, development of railway junctions

For the implementation of these activities, it is envisaged to finance investment projects within Priority 3 for:

* electrification and implementation of signaling and telecommunications;
* development of Gorna Oryahovitsa railway junction, Ruse railway junction and Varna railway junction

**Part 1:**Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

|  |  |  |  |
| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change |  | Х | The measures are eligible under the intervention field of ​​Annex I to Regulation (EU) No 2021/1060 number 108 Multimodal Transport (TEN-T) with a coefficient for calculation of support to climate change objectives of 40%.  It can be stated that the measures have a negligible foreseeable impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle due to the following:   * The purpose of the measures and the nature of the areas of intervention help to achieve the environmental objective, by ensuring better conditions for connecting freight and passenger flows to rail transport, which will help reduce greenhouse gas emissions from the traditional use of road transport. * The projects contribute to the achievement of the objectives of the National Plan for Development of Combined Transport in the Republic of Bulgaria by 2030; combined transport reduces greenhouse gas emissions. * In addition, the railway infrastructure is electrified and promotes the use of environmentally friendly transport and as such can be considered a necessary investment in the transition to an efficient climate-neutral economy. Regardless of the development alternatives chosen, rail transport has no share in the calculation of carbon volumes. * The construction of a railway junctions and electrification and implementation of signaling and telecommunications will improve intermodality and create better conditions for efficient use and combination of modes of transport and optimize the rerouting of freight and passenger transport to railway transport. This in turn contributes to reducing greenhouse gas emissions.   Therefore, it can be considered that the measures respect the principle of „do no significant harm”. |
| Adaptation to climate change |  | Х | The activities are not expected to have a greater detrimental effect on the current and expected future climate, on the measures themselves or on people, nature or assets, as they are aimed at improving the conditions for sustainable and efficient use of rail transport and will contribute to improving the resilience of infrastructure to the long-term effects of climate change, incl. increasing safety for the population, nature and tangible assets.  The measure has made a significant contribution to the introduction of interconnection mechanisms between different types of transport in terms of disaster risk reduction, ensuring the implementation of the operational objectives set in the National Disaster Risk Reduction Program until 2025.  In preparing the design the climatic characteristics of the area, including wind, precipitation, snow cover, temperatures and more were/will be taken into account when determining the technical parameters of the facilities, which are set in the technical specifications for implementation.  In view of climate change, railway infrastructure needs to be gradually adapted to more severe weather conditions. The construction of a railway junctions, electrification and implementation of signaling and telecommunications will support the goals of a complete modern railway network with better resilience to climate change.  In addition for the investments within the measure, which are above the value of EUR 10 million, a climate vulnerability and risk assessment is planned, leading to identification, appraisal and implementation of relevant adaptation measures. |
| Sustainable use and protection of water and marine resources | Х |  |  |
| The circular economy, including waste prevention and recycling | Х |  |  |
| Pollution prevention and control to air, water or land | Х |  |  |
| The protection and restoration of biodiversity and ecosystems | Х |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | Slightly predictable impact is possible when crossing rivers, as the impact is local, around the crossing point. The impact is associated with minor morphological changes in riverbeds and banks, and this impact is controllable and limited by measures prescribed by the competent authorities in the framework of EIA and AA procedures. In addition, when a water body is affected, the activity is subject to a permit regime under the Water Act, which also imposes measures to protect water bodies and prevent deterioration of their ecological status.  The impact on the ecological status of groundwater is temporary, short-term, localized in the area of ​​construction activities, with insignificant foreseeable impact, only in case of reaching shallow groundwater levels. To eliminate these consequences, the projects are accompanied by hydrogeological studies, on the basis of which, in case of risk of adverse effects on groundwater, measures are proposed in order to prevent deterioration of water bodies.  During operation, the impact is expected only in the sections of bridges, as it is insignificant, local, and could not lead to deterioration of the ecological potential of water bodies.  According to the report on strategic environmental assessment of the draft TCP 2021-2027, the implementation of the measures is not associated with a significant negative impact on the environmental objective in compliance with the measures of the EIA decisions.  In addition, through the EIA and AA procedures for each specific project, it is guaranteed, that only projects that are in line with the Bulgarian River Basin Management Plans (RBMPs), Flood Risk Management Plans (FRMPs) for the territories and Marine Strategy are approved and are not expected to harm the good status and ecological potential of bodies of surface and groundwater water or the good ecological status of marine waters when they are implemented. Therefore, it can be considered that the measures respect the principle of „do no significant harm”.  The projects are not related to marine waters. |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | Х | The measures are eligible under the intervention field of ​​Annex I to Regulation (EU) No 2021/1060 number 108 Multimodal Transport (TEN-T) with a coefficient for calculation of support to environmental objectives of 40%.  The activity is not related to waste incineration. The measures are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle or to cause significant and long-term environmental damage with relation to the circular economy.  The measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle.  The activities envisaged for implementation are planned to be performed on sites where partialy elements of the railway infrastructure are currently located.  It is envisaged to limit the generation of waste during construction works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction object, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste management Plan.  Therefore, and given the nature of the foreseeable impacts, it can be considered that the measures respect the principle of “do no significant harm” to the environmental objective. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? |  | The measure is not expected to lead to a significant increase in pollutant emissions in the air.  The measure is in connection with the objectives of the national policy for action on climate change and the need to diversify transport and increase the share of electric transport.  Emissions in the air are expected only during the construction phase – they are local, temporary, insignificant, completely reversible. Their quantity will be minimized with implementation of mitigation measures for reducing of the dust generation.  The project activities aim to improve the technical and operational condition of the railway line and the accompanying infrastructure and creation of new facilities, through which the conditions for the reorientation of passenger and freight transport to railway transport, which has the lowest percentage of emissions of harmful substances in ambient air and of greenhouse gases compared to the other modes of transport.  Regarding water pollution - the impact is insignificant and reversible, associated with the deposition of insignificant amounts of dust and gas emissions during construction. During the operation there is no impact on the water, except for repair works - the degree is insignificant, the impact is reversible - similar to the construction stage.  With regard to soils, the impact is not related to soil contamination in the normal course of activities (as for the prevention of accidents with construction and transport equipment, preventive measures are applied in accordance with the Emergency Action Plan; maintenance, including refueling with fuel, oil change, repair works on construction and transport equipment are not carried out within the construction sites, but only in specialized services) - for each terrain with a soil layer is a regulated requirement in the presence of humus to separate it from the rest of the earth and to use it for its intended purpose - for reclamation and prevention of erosion processes in the disturbed terrains of the transport infrastructure.  Therefore, it can be considered that the measures respect the principle of „do no significant harm”. |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? |  | Some of the activities will be carried out on already urbanized territories owned by the NRIC, or in the immediate vicinity of urban areas, therefore no significant impact on biodiversity is expected.  In the EIA Decisions for approval of the projects there are mitigation measures for the expected impacts on biodiversity and Natura 2000 protected areas that will be implemented during the realization of the projects and that ensure the control and prevention of the impact to the permissible limits.  If there is a possibility of impact on protected areas AA will be done - based on site specific conservation objectives.  The Appropriate assessment procedures and the implementation of the mitigation measures resulting from these procedures shall ensure that the approved activities / projects do not lead to a significant deterioration of the health and resilience of ecosystems or to the deterioration of the conservation status of habitats and species, including those of Union interest. In this respect, the measure is considered to respect the principle of „do no significant harm”. |

## Measure: Development of existing intermodal terminals; intermodal connections; warehousing areas and logistics centres; intermodal transport units, rolling stock and transhipment equipment, construction of new intermodal terminals in case of readiness

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change | Х |  |  |
| Adaptation to climate change | Х |  |  |
| Sustainable use and protection of water and marine resources | Х |  |  |
| The circular economy, including waste prevention and recycling | Х |  |  |
| Pollution prevention and control to air, water or land | Х |  |  |
| The protection and restoration of biodiversity and ecosystems | Х |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Mitigation of climate change:* Is the measure expected to lead to significant GHG emissions? | Х | The implementation of the measures does not have any foreseeable negative impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle.  The activities under the measure contribute to the development and transition to water and rail and even more to multimodal / combined transport, which have significantly lower levels of GHG emissions compared to road transport, especially with regard to freight transport.  The shift from road to railway and/or water, promotes the use of environmentally friendly transport and as such can be considered a necessary investment in the transition to an efficient climate-neutral economy, thus contributing to the rerouting of freight and passenger transport from the road transport. This in turn contributes to reducing greenhouse gas emissions.  The projects contribute to the achievement of the objectives of the National Plan for Development of Combined Transport in the Republic of Bulgaria until 2030; combined transport reduces greenhouse gas emissions. In this sense, the measure can be considered to have some positive contribution.  In addition, the railway infrastructure is electrified and promotes the use of environmentally friendly transport and as such can be considered a necessary investment in the transition to an efficient climate-neutral economy. Regardless of the development alternatives chosen, rail transport has no share in the calculation of carbon volumes.  Therefore, it can be considered that the measures respect the principle of „do no significant harm”. |
| *Adaptation to climate change:* Is the measure expected to lead to an increased adverse impact of the current climate and the expected future climate, on the measure itself or on people, nature or assets? | Х | The activities are not expected to have a greater detrimental effect on the current and expected future climate, on the measures themselves or on people, nature or assets, as they are aimed at improving the conditions for sustainable and efficient use of rail transport and will contribute to improving the resilience of infrastructure to the long-term effects of climate change, incl. increasing safety for the population, nature and tangible assets.  The measure has made a significant contribution to the introduction of interconnection mechanisms between different types of transport in terms of disaster risk reduction, ensuring the implementation of the operational objectives set in the National Disaster Risk Reduction Program until 2025.  In preparing the design the climatic characteristics of the area, including wind, precipitation, snow cover, temperatures and more were/will be taken into account when determining the technical parameters of the facilities, which are set in the technical specifications for implementation.  In view of climate change, logistic transport infrastructure needs to be gradually adapted to more severe weather conditions. The development and modernisation of existing intermodal terminals will support the goals of a complete modern transport infastructure with better resilience to climate change.  In addition for the investments within the measure, which are above the value of EUR 10 million, a climate vulnerability and risk assessment is planned, leading to identification, appraisal and implementation of relevant adaptation measures. |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | The impact on waters is mainly local and reversible during the construction phase (in the presence of a surface water body in the immediate vicinity). During the operation of the facilities, the impact on the condition of surface and groundwater appears to be insignificant, when applying appropriate measures to prevent spills of lubricants, fuels, etc., which are required by the environmental protection legislation in the country.  The planned activities are not related to water abstraction and/or use of surface water body, therefore no morphological changes are expected on the river banks and riverbeds. The implementation of the measure does not include new physical modifications and does not have an impact that would worsen their ecological condition and potential. The implementation of the activities will not lead to negative changes in the levels of groundwater bodies.  The measure is in accordance with the National Plan for Development of Combined Transport in the Republic of Bulgaria until 2030 and Integrated Transport Strategy by 2030, which was subject to Strategic Environmental Assessment (SEA) procedure and according to the results of SEA there are no significant negative impacts on the sustainable use and protection of water and marine resources.  In addition, through the EIA and AA procedures for each specific project it is guaranteed, that only projects that are in line with the Bulgarian River Basin Management Plans (RBMPs), Flood Risk Management Plans (FRMPs) for the territories and Marine Strategy are approved and are not expected to harm the good status and ecological potential of bodies of surface and groundwater water or the good ecological status of marine waters when they are implemented.  Therefore, it can be considered that the measure respects the principle of „do no significant harm”. |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | Х | The activity is not related to waste incineration. The measures are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle or to cause significant and long-term environmental damage to the circular economy.  The measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle.  The activities envisaged for implementation are planned to be performed on sites where partialy elements of the logistic transport infrastructure are existing.  It is envisaged to limit the generation of waste during construction works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction object, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste management Plan.  With proper management of the generated waste, mainly from construction activities, no significant negative impact can be expected, including potential for significant inefficiencies in the direct or indirect use of any natural resource at any stage of its life cycle which are not minimised by adequate measures or potential to cause significant and long-term harm to the environment in respect to the circular economy.  Therefore, and given the nature of the foreseeable impacts, it can be considered that the measures respect the principle of “do no significant harm” to the environmental objective. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? |  | During the construction period, various types of activities will be carried out, as a result of which unorganized dust emissions in the atmospheric air will be formed. Emissions during this period will be direct, reversible, short-term and localized in the working areas, and will not affect the overall state of the air - emissions will be generated in a short period of time and the impact is completely reversible. The operation is associated with insignificant unpredictable emissions that will not affect the quality of ambient air in the area of ​​the site.  With regard to water, according to the above analysis of the ecological status of water, no pollution is expected leading to its deterioration.  With regard to land - it is expected that most projects under the measure will be implemented in existing urban / industrial areas, or in close proximity to such - ie. terrains with already disturbed, anthropogenic soils will be affected. The impacts are direct, one-time, reversible - given that in places with humus layer there is a legal requirement for the soil layer to be removed before the start of construction work and subsequently used for its intended purpose - for shaping and landscaping of free areas. Reclamation of the disturbed terrains is necessary, which is a required part of the project documentation, which will improve the condition of the soils compared to the current one.  In this regard, the measures are considered to respect the principle of “do no significant harm” to the environmental objective. |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? |  | In general, the activities under the measure are expected to be carried out in urban areas.  In this regard, the implementation of the projects is not expected to lead to a negative impact on natural habitats and habitats of species subject to protection in protected areas, as such territories will not be affected directly and indirectly.  In the EIA Decisions for approval of the projects there are mitigation measures for the expected impacts on biodiversity and Natura 2000 protected areas that will be implemented during the realization of the projects and that ensure the control and prevention of the impact to the permissible limits.  If there is a possibility of impact on protected areas, an AA will be done - based on site specific conservation objectives.  The AA procedures and the implementation of the mitigation measures resulting from these procedures shall ensure that the approved activities / projects do not lead to a significant deterioration of the health and resilience of ecosystems or to the deterioration of the conservation status of habitats and species, including those of Union interest. In this respect, the measure is considered to respect the principle of “do no significant harm”. |

## Measure: Development of information systems in transport, upgrading existing systems and systems under construction (construction of ERTMS and ETCS (first level), implementation of automatic crossing devices, upgrading and implementation of SCADA in traction substations))

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change |  | Х | The measures are eligible under the intervention field of ​​Annex I to Regulation (EU) No 2021/1060 number 105 European Rail Traffic Management System (ERTMS) with a coefficient for calculation of support to climate change objectives of 40%.  In view of the above two areas of intervention, it can be stated that the measures have a negligible foreseeable impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle due to the following:   * The development of information systems in transport, upgrading existing systems and systems under construction promotes the use of environmentally friendly transport and as such can be considered a necessary investment in the transition to an efficient climate-neutral economy. * As part of the railway infrastructure, the construction of ERTMS and ETCS (first level), the implementation of automatic crossing devices, the upgrading and implementation of SCADA in traction substations subject to this project is entirely aimed at reducing greenhouse gas emissions in the transport sector. * Railway transport in Bulgaria is electrified and as such, regardless of the chosen development alternatives, it has no share in the calculation of carbon emission volumes. * The development of information systems in transport, create better conditions for offering transport services on the railway infrastructure, thus contributing to the re-routing of freight and passenger transport from the road transport. This in turn contributes to reducing the greenhouse gas emissions.   In this regard, the measures are considered to respect the principle of “do no significant harm” to the environmental objective. |
| Adaptation to climate change |  | Х | The measure is in line with the climate change adaptation aim as:  - The respective measures from the National Adaptation Strategy of Bulgaria which will ensure the sustainability of the project to the current climate and the expected future climate, will be implemented;  - The measure is related to the development of information systems in transport, upgrading existing systems and systems under construction. The railway transport system of the country, to which the development of information systems are part, is constantly affected by atmospheric conditions, but is very resistant to climate change, as it is designed and built in accordance with the local climatic conditions in different parts of the country.  In view of climate change, railway infrastructure needs to be gradually adapted to more severe weather conditions. Through the development of information systems in transport, the goals of a complete modern railway network with better resilience to climate change are expected to be achieved. In addition, it can be stated that the measure offers adaptation solutions that would help prevent or reduce the risk of adverse effects of climate change. |
| Sustainable use and protection of water and marine resources |  | Х | The activities for implementation of the measure are not related to the impact on surface waters, incl. seawater and groundwater – they are not related to water abstraction and/or use of surface water body, therefore no morphological changes are expected on the river banks and riverbeds. The implementation of the measure does not include new physical modifications and does not have an impact that would worsen their ecological condition and potential. The implementation of the activities will not lead to negative changes in the levels of groundwater bodies.  Therefore, and because of their nature, they are considered to comply with the DNSH principle to the environmental objective. |
| The circular economy, including waste prevention and recycling | Х |  |  |
| Pollution prevention and control to air, water or land | Х |  |  |
| The protection and restoration of biodiversity and ecosystems |  | Х | It is not expected to have a negative impact on plant communities and species of plants and animals of conservation importance. The activities are supposed to be carried out within the limits of urbanized territories for railway transport and existing properties. Therefore, and because of their nature, they are considered to comply with the DNSH principle to the environmental objective. |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | Х | The activity is not related to waste incineration. The measures are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle or to cause significant and long-term environmental damage as regards to the circular economy.  The measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle.  The activities envisaged for implementation are planned to be performed on sites where elements of the transport infrastructure are currently located.  It is envisaged to limit the generation of waste during construction and assembly works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction object, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste Management Plan.  With proper management of the generated waste, mainly from construction activities, no significant negative impact can be expected.  Therefore, and because of their nature, the measures are considered to comply with the DNSH principle to the environmental objective. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? | Х | The measure is not expected to lead to a significant increase in pollutant emissions in the air. Such emissions are expected only during the construction phase – they are local, temporary, insignificant, and completely reversible. Their quantity will be minimized with implementation of mitigation measures for reducing of the dust generation.  With regard to water, the activities do not involve emissions of pollutants into water.  With regard to lands and in particular - soils - the activities will be implemented in developed, urbanized territories intended for rail transport, in extremely limited in scope and size areas, therefore no significant impact on soils is expected. In the places with humus layer there is a normative requirement for the soil layer to be removed before the beginning of the construction works and subsequently used for its intended purpose - for shaping and landscaping of the areas free from construction. In this regard, the measures are considered to comply with the DNSH principle to the environmental objective. |

## Measure: Delivery of multifunctional vessels; modernization and construction of facilities for improving transport safety

The measure includes:

* **Supply of additional multifunctional vessels and facilities** for improvement of the conditions for navigation on the Danube River and for the necessary data and information for adequate intervention in low water periods to provide the necessary depths for navigation, as well as to improve the navigation conditions, respectively increasing **safety in the river**.
* **The delivery of multi-purpose emergency rescue and patrol vessels and specialized equipment** as well as deployment of an **integrated information system for real-time coordination and management of operations in conditions of disasters and accidents** is envisaged, through which the functions related to the provision of **safety and security in the marine areas of Bulgaria**, as well as the response to combined incidents /search and rescue, fires, oil spils, pollution of sea spaces/. It is also envisaged that a **coastal center** will be established to exercise overall control over shipping in the maritime spaces of Bulgaria, with respect to compliance with the international rules for the prevention of collision at sea /COLREG/, the fulfillment of the ship reporting requirements, as well as and overall controls to prevent illegal pollution from shipping.
* **Road safety measures along the TEN-T** (to improve the effectiveness of monitoring and control of road users, to establish automatic devices for controlling the speed monitoring mode, to modernize the information systems guaranteeing safety and security, to reconstruct and to improve the organization of traffic; construction and installation works related to the physical separation of transport flows; improvement of road markings and road signs, etc.)

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change |  | X | The measures have a negligible foreseeable impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle due to the following:   * The measures envisage the purchase and supply of specialized vessels, operating with internal combustion engines, respectively generating certain levels of greenhouse gas emissions. These vessels will not be used permanently, but only when necessary, the emission levels generated by them are generally insignificant. On the other hand, since the purpose of these two activities is to increase safety, incl. providing the necessary depths for the safe movement of ships, as well as adequate response to emergencies, the positive effect of limiting the impact on the climate will exceed in quantitative terms the generated emissions of internal combustion engines of vessels. * The positive effect is expressed in: ensuring the necessary draft depth of the ships, respectively their optimal speed, which in turn leads to reduced engine load, respectively lower levels of greenhouse gas emissions; adequate and rapid response to incidents and accidents in water bodies will allow the fastest response and limitation of spills and consequences of fires from accidents in water bodies, respectively limiting the emission of greenhouse gases in such situations. * Investments aimed at the deployment of an integrated information system for real-time coordination and management of operations in conditions of disasters and accidents will partly contribute to the reduction of greenhouse gases through better management of such disasters and accidents. In any case, this will not lead to significant additional emissions. * The construction of a coastal center will contribute to the reduction of greenhouse gases through better management and control of shipping in the maritime spaces of Bulgaria. * Activities to improve road safety do not lead to the generation of greenhouse gas emissions, but will contribute to the reduction of emissions from road transport in the relevant road sections, due to improved speed, reduction of congestion and risk of accidents (including fires).   Therefore, the measures are considered to comply with the DNSH principle to the environmental objective. |
| Adaptation to climate change |  | X | The measure is in line with the climate change adaptation aim as through the envisaged information systems the receipt of timely, adequate information in the event of emergencies or extreme weather events will be ensured, respectively the ability to respond in a timely manner will be improved.  The measure helps to meet the strategic objectives set in the National Disaster Risk Reduction Program by 2030 for building systems, including through innovative solutions, for monitoring, forecasting, realistic modeling, early warning and notification of the population and public executive authorities to reduce the risk of disasters.  The use of: multi-purpose rescue and patrol vessels will improve the efficiency of response to possible disasters and incidents, incl. ones, that occurred as a consequence of climate change.  Projects to improve shipping contribute to the objectives of the Common Maritime Program for the Black Sea by promoting sustainable and safe shipping, smart connectivity and digitalisation.  The measure is considered to have no negative impact on the target. It does not affect in negative way the current and expected future climate, the activity itself or people, nature and assets, nor does it harm adaptation to climate change. The nature of the measure is such as to optimize the organizational capacity to carry out certain tasks without changing their nature, in particular as regards their impact on adaptation to climate change. |
| Sustainable use and protection of water and marine resources | Х |  |  |
| The circular economy, including waste prevention and recycling |  | X | The activities under the measure are by their character and nature not related to waste generation.  A positive contribution of the measure for management of wastes, generated as a result of spills and emergencies in water bodies is expected, incl. reduction of response time, waste collection, prevention of waste pollution.  Concerning road safety measures, the activities envisaged for implementation are planned to be performed on sites where elements of the transport infrastructure are currently located.  It is envisaged to limit the generation of waste during construction and assembly works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction object, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste Management Plan.  With proper management of the generated waste, mainly from construction activities, no significant negative impact can be expected, including potential for significant inefficiencies in the direct or indirect use of any natural resource at any stage of its life cycle which are not minimised by adequate measures or potential to cause significant and long-term harm to the environment in respect to the circular economy.  Therefore, and given their nature, the measures are considered to comply with the DNSH principle to the environmental objective. |
| Pollution prevention and control to air, water or land |  | Х | No significant emissions of harmful substances into the atmosphere are expected, on the contrary - the activities are related to reducing these emissions compared to current levels without the application of this measure. The measure is not related to water and land pollution.  Insignificant quantities of emissions in the air are expected only during the construction phase – they are local, temporary, insignificant, completely reversible. Their quantity will be minimized with implementation of mitigation measures for reducing of the dust generation.  The projects activities’ aim to delivery of multifunctional vessels; modernization and construction of facilities for improving transport safety and environmental protection, which will contribute to pollution prevention and better control to air, water or land. |
| The protection and restoration of biodiversity and ecosystems | Х |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | The activities for supply of additional multifunctional vessels and facilities and delivery of multi-purpose emergency rescue and patrol vessels and specialized equipment as well as deployment of an integrated information system for real-time coordination and management of operations in conditions of disasters and accidents is envisaged, through which the functions related to the provision of safety and security in the Danube river and marine areas of Bulgaria are related to the purchase of equipment, the use of which is not related to the impact on the environmental potential of water - on the contrary, it is expected that the equipment will provide a faster and more adequate response to accidents, including associated with pollutant spills, which will prevent significant adverse effects on water. The activities for providing the necessary depths for navigation (which are not subject to the measure) should be subject to the required EIA procedures, within which the parameters of the impacts of these activities on the water body for each specific section should be assessed in detail, for which deepening is envisaged. The EIA procedure will ensure that significant impact on the surface water body is avoided.  Road safety measures along the TEN-T do not have a direct impact on water, but are expected to make an indirect positive contribution to improving the condition of surface water bodies located near roads with improved safety, given that traffic will be improved, emissions from traffic will be reduced, and reduced risk of road accidents directly leads to reduced risk of pollution of nearby water bodies from spills of pollutants in accidents.  Therefore, and because of the nature of the activities, they are considered to comply with the DNSH principle to the environmental objective. |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? | Х | According to SEA Report of Programme Transport connectivity 2021-2027 the activities under the measure are not related to the negative impact on the biological diversity, as they are for existing sites/activities. An indirect positive contribution to the objective is expected, as it will reduce the risk of accidents and water pollution.  The activities to provide the necessary depths for navigation (which are not subject to the measure) should be subject to the required EIA procedures, within which to assess in detail the parameters of the impacts of these activities on biodiversity and, if a likely impact on the subject and objectives of the protected areas, Appropriate assessments are also performed - taking into account the specific conservation objectives for the protected areas.  The projects for the Bulgarian maritime search and rescue system and for the acquisition of a specialized multifunctional rescue ship contribute to the safety and sustainability of maritime transport in case of maritime accidents, which reduces the harmful impact of maritime transport on the environment, including NATURA areas, when planning and performing emergency operations. The project related to the construction of an information system for safety and sustainability of maritime transport contributes to the prevention of pollution of the marine environment by ships and increase the safety of shipping by exercising general control over shipping in the maritime areas of Bulgaria.  The implementation of the projects does not require additional land expropriation, as the activities are for supply of multifunctional vessels and for road safety measures, which are situated on sites owned by the Road Infrastructure Agency.  In this regard, the implementation of the measure is not expected to lead to a negative impact on natural habitats and habitats of species subject to protection in protected areas.  Therefore, and because of the nature of the activities, they are considered to comply with the DNSH principle to the environmental objective. |

## Measure: Construction of infrastructure for alternative fuels along the main directions of the national road network /TEN-T/ and in the ports for public transport /maritime and inland-waterways/

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change |  | Х | The measures are eligible under the intervention field of ​​Annex I to Regulation (EU) No 2021/1060 number 086 Alternative fuels infrastructure with a coefficient for calculation of support to climate change objectives of 100%.  The objective of the measure directly supports the climate change mitigation objective. The charging infrastructure encourages electrification and can be considered as a necessary investment in the transition to an efficient climate-neutral economy.  By building charging infrastructure for alternative fuels along the national road network and in the ports for public transport, the greenhouse gas emissions will be limited, which leads to climate change mitiation. The measure contributes to the achievement of the European Green Deal.  The measure is expected to lead to reduction of GHG emissions; it is part of the Integrated Transport Strategy by 2030, aimed at decarbonising transport in line with 2030 climate targets.  The activities under the measure contribute to the development and transition to electric vehicles and ships, which leads to reduction of GHG emissions, compared to transport with conventional fuels, especially with regard to freight transport.  The steps taken to replace high-emission cars with electric ones and the construction of charging stations in cities through Programme Environment 2021-2027 and the Programme Development of Regions 2021-2027, will be complemented by the investments under Programme Transport Connectivity 2021-2027 for the construction of charging stations for alternative fuels along the national road network. |
| Adaptation to climate change |  | Х | The measure does not have a direct contribution to climate change adaptation, but it has indirect - charging stations as facilities are more resistant to extreme events resulting from climate change than traditional petrol and gas stations, as well as possible damage due to extreme weather conditions phenomena will have a much smaller impact on the environment and the population as a whole (not related to the generation of spills / leakages of hazardous substances, environmental pollution or risk to human health).  In addition, the situating of the infrastructure for alternative fuels as a location will take into account the risks of adverse meteorological phenomena and floods in the area and the vulnerability of the planned terrain (potential for landslides, terrain slope).  Therefore, the measure can be considered to contribute to the environmental objective by providing investment in resistant to risk from disaster infrastructure, set as a priority area for action in the National Strategy for Disaster Risk Reduction by 2030. |
| Sustainable use and protection of water and marine resources |  | Х | The construction of infrastructure for alternative fuels will be carried out in accordance with the applicable environmental legislation, the location will be chosen taking into account the risks of adverse meteorological phenomena and floods in the area and the vulnerability of the planned terrain (potential for landslides, slope of the terrain);  The charging infrastructure is not related to water use or wastewater discharge into water bodies, therefore no negative impact on water and marine resources is expected, also according to the SEA Report of the Transport Connectivity Program 2021-2027.  Therefore, and because of the nature of the activities, they are considered to comply with the DNSH principle for the environmental objective. |
| The circular economy, including waste prevention and recycling |  | Х | The implementation of the projects does not require significant primary natural resources, as the project will be implemented on existing transport infrastructure, using completed technical equipment.  The construction and operation phase of the projects under this measure do not generate significant waste quantities.  With proper management of the generated waste, mainly from construction activities, no significant negative impact can be expected.  For every construction project, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste Management Plan.  Therefore, and given the nature of the foreseeable impacts, the measures are considered to comply with the DNSH principle to the environmental objective. |
| Pollution prevention and control to air, water or land |  | Х | The activities under the measure are not related to significant emissions of pollutants into the environment - only during the construction of the infrastructure insignificant emissions into the atmosphere are expected, with local, limited scope and completely reversible impact.  The projects for construction of charging infrastructure for alternative fuels will significantly contribute to the improvement of the ambient air quality, reduction of pollution from vehicles and to the protection of the environment, respectively, the measure contributes to the environmental objective.  Therefore, and because of the nature of the activities, they are considered to comply with the DNSH principle to the environmental objective. |
| The protection and restoration of biodiversity and ecosystems |  | Х | The activities for the construction of the infrastructure will be realized within the limits of already utilized terrains for roads and ports, and in this connection no negative impact on the biological diversity is expected - both directly and indirectly.  Therefore, and because of the nature of the activities, they are considered to comply with the DNSH principle to the environmental objective. |

# Priority 4 “Intermodality in urban areas”

## Measure: Construction of railway connections to airports in urban areas

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change |  | Х | The measures are eligible under the intervention field of ​​Annex I to Regulation (EU) No 2021/1060 number 108 Multimodal Transport (TEN-T) with a coefficient for calculation of support to climate change objectives of 40%.  It can be stated that the measures have a negligible foreseeable impact on the environmental objective related to its direct and primary indirect impacts throughout its life cycle due to the following:   * The purpose of the measures and the nature of the areas of intervention help to achieve the environmental objective, by ensuring better conditions for connecting freight and passenger flows to rail transport, which will help reduce greenhouse gas emissions from the traditional use of road transport. * The projects contribute to the achievement of the objectives of the National Plan for Development of Combined Transport in the Republic of Bulgaria until 2030; combined transport reduces greenhouse gas emissions. * In addition, the railway infrastructure is electrified and promotes the use of environmentally friendly transport and as such can be considered a necessary investment in the transition to an efficient climate-neutral economy. Regardless of the development alternatives chosen, rail transport has no share in the calculation of carbon volumes. * The construction of a railway connections to airports in urban areas will improve intermodality and create better conditions for efficient use and combination of modes of transport and optimize the rerouting of freight and passenger transport to railway transport. This in turn contributes to reducing greenhouse gas emissions.   Therefore, it can be considered that the measures respect the principle of „do no significant harm”. |
| Adaptation to climate change |  | Х | The activities are not expected to have a greater detrimental effect on the current and expected future climate, on the measures themselves or on people, nature or assets, as they are aimed at improving the conditions for sustainable and efficient use of rail transport and will contribute to improving the resilience of infrastructure to the long-term effects of climate change, incl. increasing safety for the population, nature and tangible assets.  The measure has made a significant contribution to the introduction of interconnection mechanisms between different types of transport in terms of disaster risk reduction, ensuring the implementation of the operational objectives set in the National Disaster Risk Reduction Program until 2025.  In preparing the design the climatic characteristics of the area, including wind, precipitation, snow cover, temperatures and more were/will be taken into account when determining the technical parameters of the facilities, which are set in the technical specifications for implementation.  In view of climate change, railway infrastructure needs to be gradually adapted to more severe weather conditions. The construction of a railway connections to airports in urban areas will support the goals of a complete modern railway network with better resilience to climate change.  In addition for the investments within the measure, which are above the value of EUR 10 million, a climate vulnerability and risk assessment is planned, leading to identification, appraisal and implementation of relevant adaptation measures. |
| Sustainable use and protection of water and marine resources | Х |  |  |
| The circular economy, including waste prevention and recycling | Х |  |  |
| Pollution prevention and control to air, water or land | Х |  |  |
| The protection and restoration of biodiversity and ecosystems | Х |  |  |

**Part 2:** Substantive DNSH assessment for those environmental objectives that require it

| *Questions* | *No* | *Justification as to the substance* |
| --- | --- | --- |
| *Sustainable use and protection of water and marine resources:* Is the measure expected to be detrimental:  (I) the good status or ecological potential of bodies of water, including surface water and groundwater; or  (II) the good environmental status of marine waters? | Х | Slightly predictable impact is possible when crossing rivers, as the impact is local, around the crossing point. The impact is associated with minor morphological changes in riverbeds and banks, and this impact is controllable and limited by measures prescribed by the competent authorities in the framework of EIA and AA procedures. In addition, when a water body is affected, the activity is subject to a permit regime under the Water Act, which also imposes measures to protect water bodies and prevent deterioration of their ecological status.  The impact on the ecological status of groundwater is temporary, short-term, localized in the area of ​​construction activities, with insignificant foreseeable impact, only in case of reaching shallow groundwater levels. To eliminate these consequences, the projects are accompanied by hydrogeological studies, on the basis of which, in case of risk of adverse effects on groundwater, measures are proposed in order to prevent deterioration of water bodies.  During operation, the impact is expected only in the sections of bridges, as it is insignificant, local, and could not lead to deterioration of the ecological potential of water bodies.  According to the report on strategic environmental assessment of the draft TCP 2021-2027, the implementation of the measures is not associated with a significant negative impact on the environmental objective in compliance with the measures of the EIA decisions.  In addition, through the EIA and AA procedures for each specific project, it is guaranteed, that only projects that are in line with the Bulgarian River Basin Management Plans (RBMPs), Flood Risk Management Plans (FRMPs) for the territories and Marine Strategy are approved and are not expected to harm the good status and ecological potential of bodies of surface and groundwater water or the good ecological status of marine waters when they are implemented. Therefore, it can be considered that the measures respect the principle of „do no significant harm”.  The projects are not related to marine waters. |
| The *transition to a circular economy, including waste prevention and recycling:* Is the measure expected to:  (I) lead to a significant increase in the generation, incineration or disposal of waste, excluding the incineration of non-recyclable hazardous waste; or  (II) lead to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle, which are not minimised by appropriate measures; or  (III) cause significant and long-term environmental damage to the circular economy? | Х | The measures are eligible under the intervention field of ​​Annex I to Regulation (EU) No 2021/1060 number 108 Multimodal Transport (TEN-T) with a coefficient for calculation of support to environmental objectives of 40%.  The activity is not related to waste incineration. The measures are not expected to lead to a significant increase in the generation or disposal of waste, as well as to significant inefficiencies in the direct or indirect use of natural resources at any stage of its life cycle or to cause significant and long-term environmental damage with relation to the circular economy.  The measure has a negligible foreseeable impact on this environmental objective, taking into account both direct and primary indirect impacts throughout the life cycle.  The activities envisaged for implementation are planned to be performed on sites where partialy elements of the railway infrastructure are currently located.  It is envisaged to limit the generation of waste during construction works in accordance with the EU Protocol on Construction and Demolition Waste Management and by taking into account the best available techniques and facilitating their reuse and high quality recycling through selective disposal of materials, using the available systems for sorting construction waste. The generated waste will be collected separately and will be handed over for transportation and subsequent treatment - recovery or disposal, to licensed companies according to the requirements of the Waste Management Act. For every construction object, in accordance with the national waste management legislation will be elaborated and fully implemented a Construction Waste management Plan.  Therefore, and given the nature of the foreseeable impacts, it can be considered that the measures respect the principle of “do no significant harm” to the environmental objective. |
| *Pollution prevention and control:* Is the measure expected to lead to a significant increase in the emissions of pollutants into air, water or land? |  | The measure is not expected to lead to a significant increase in pollutant emissions in the air.  The measure is in connection with the objectives of the national policy for action on climate change and the need to diversify transport and increase the share of electric transport.  Emissions in the air are expected only during the construction phase – they are local, temporary, insignificant, completely reversible. Their quantity will be minimized with implementation of mitigation measures for reducing of the dust generation.  The project activities aim to improve the technical and operational condition of the railway line and the accompanying infrastructure and creation of new facilities, through which the conditions for the reorientation of passenger and freight transport to railway transport, which has the lowest percentage of emissions of harmful substances in ambient air and of greenhouse gases compared to the other modes of transport.  Regarding water pollution - the impact is insignificant and reversible, associated with the deposition of insignificant amounts of dust and gas emissions during construction. During the operation there is no impact on the water, except for repair works - the degree is insignificant, the impact is reversible - similar to the construction stage.  With regard to soils, the impact is not related to soil contamination in the normal course of activities (as for the prevention of accidents with construction and transport equipment, preventive measures are applied in accordance with the Emergency Action Plan; maintenance, including refueling with fuel, oil change, repair works on construction and transport equipment are not carried out within the construction sites, but only in specialized services) - for each terrain with a soil layer is a regulated requirement in the presence of humus to separate it from the rest of the earth and to use it for its intended purpose - for reclamation and prevention of erosion processes in the disturbed terrains of the transport infrastructure.  Therefore, it can be considered that the measures respect the principle of „do no significant harm”. |
| *Protecting and restoring biodiversity and ecosystems:* Is the measure expected to:  (I) significantly deteriorate the health and resilience of ecosystems; or  (II) to deteriorate the conservation status of habitats and species, including those of Union interest? |  | Some of the activities will be carried out on already urbanized territories owned by the NRIC, or in the immediate vicinity of urban areas, therefore no significant impact on biodiversity is expected.  In the EIA Decisions for approval of the projects there are mitigation measures for the expected impacts on biodiversity and Natura 2000 protected areas that will be implemented during the realization of the projects and that ensure the control and prevention of the impact to the permissible limits.  If there is a possibility of impact on protected areas AA will be done - based on site specific conservation objectives.  The Appropriate assessment procedures and the implementation of the mitigation measures resulting from these procedures shall ensure that the approved activities / projects do not lead to a significant deterioration of the health and resilience of ecosystems or to the deterioration of the conservation status of habitats and species, including those of Union interest. In this respect, the measure is considered to respect the principle of „do no significant harm”. |

# PRIORITY FOR Technical assistance

The priority will provide support for the implementation of the following activities:

* carrying out specialized activities and preparation of studies, analyzes and evaluations regarding the implementation and completion of OPTTI 2014-2020 as well as supporting the preparation of the programme for the period 2028-2034;
* implementation of the planned communication and information and publicity activities in connection with the implementation of PTC and completion of OPTTI 2014-2020.
* provision of costs for remuneration, additional remuneration and social security contributions to employees of Managing Authority and Bneficiaries in accordance with the Regulation (EU) 2021/1060 and national rules developed;
* provision of accommodation and secondment for staff responsible for the management and implementation of PTC during trips abroad, in connection with the programme activities;
* preparing, organizing and conducting specialized training /including for Natura 2000, Protected Areas, the DNSH principle and environmental policies, legislation and good practices/, seminars, conferences and meetings for employees of the Managing Authority, Beneficiaries and representatives of social partners civil society otganizations participating in the Monitoring Committee of PTC, including the costs of renting halls and equipment, fees for trainers and training courses, preparation and copying of materials as well as translations and catering;
* gradual establishment of databases, development of a program for strengthening the resilience of the transport network to extreme weather events and updating the design guidelines; assessment of training needs and implementation of training programs in the field of climate change and measures for adaptation to climate change, in accordance with the recommendations of the National Strategy for Adaptation to Climate Change and Action Plan;
* Improvement of the material and technical facilities, including the rent, leasing, purchase and/or insurance of equipment necessary for the MA staff and the beneficiaries to carry out their activities regarding the programme;
* organizing the activities of the PTC Monitoring Committee, the meetings of the Monitoring Sub-Committees, if established (including administrative and logistical costs), as well as holding the final meetings of the OPTTI 2014-2020 Monitoring Committee;
* ensuring specialized external expertise and assistance from international financial institutions in specific areas such as sectoral policy development, project management support etc;
* development of a methodology for management of the activities on the national roads (survey, analysis, planning);
* Strengthening the capacities to prevent, detect, report and follow-up on irregularities and fraud affecting the funds, including through:
* reporting in IMS any irregularity or fraud detected, when it is required according to the applicable reporting rules including those stemming from OLAF cases/recommendation, and regular updating all IMS notifications;
* developing an anti-fraud policy or statement at programme level, consistent with the National Anti-Fraud Strategy (NAFS) i.e. The National Strategy for Preventing and Combating Irregularities and Fraud Affecting the Financial Interests of the European Union;
* for the period 2021 - 2027 (NAFS), adopted by Decision 833 of 12 November 2020 of the Council of Ministers, and the annual plans for its implementation;
* fully exploiting the available data mining tools, such as Arachne.
* preparation and updating of strategic and programmatic documents in the field of transport, mid-term review and updating of the Integrated Transport Strategy of the Republic of Bulgaria, updating of the transport model, etc. in line with new trends in European and national policies and in line with EC recommendations, including an environmental monitoring plan for the implementation of the PTC 2021-2027 and a manual for preparation and implementation of measures for mitigation of the negative impact on the environment in the implementation of the infrastructure projects under the PTC 2021-2027; development of action plans under Regulation (EU) 1143/2014 on the prevention and management of the introduction and spread of invasive foreign species, based on a preliminary analysis, of the main routes of entry and transport / introduction and spread / of accidental foreign species - plants, fungi and animals of importance for Bulgaria and the EU, e.g. with: airplanes, watercraft, ballast water, hulls of vessels, trains, etc.;
* preparation of a study for modernization / development of terminals / port facilities in the Republic of Bulgaria, including preparation of a scheme for modernization / development of terminals / port facilities in the Republic of Bulgaria;
* development and implementation of effective and proportionate measures and procedures to combat fraud by the MA and beneficiaries, taking into account the identified risks;
* measures for prevention, detection and correction of irregularities, including conflicts of interest and corruption in the MA and beneficiaries of PTC;
* providing support for the preparation of projects in the transport sector;
* conducting information campaigns to promote investment in transport and to raise awareness of road safety risk factors;
* preparation of documents and measures for improvement of the order, requirements, organization, conditions and the manner of conducting the training for acquiring the right to drive a motor vehicle and conducting the examinations of the candidates.

**Part 1:** Examination and selection of the six environmental objectives in order to identify those for which a substantive assessment is required

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| --- | --- | --- | --- |
| *Please indicate which of the environmental objectives below require a substantive DNSH assessment of the measure* | *Yes* | *No* | *Justification if ‘No’ has been selected* |
| Mitigation of climate change |  | X | The implementation of the measure will not lead to an increased adverse impact of the current climate and the expected future climate on the implemented measures or on people, nature or assets. The measure does not envisage directly related infrastructure projects that could cause damage.  The technical assistance have no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective. Moreover it can be considered with possitive impact as it will facilitate taking better technical solutions in order to apply the strategic European and National documents related to reduction of GHGs. |
| Adaptation to climate change |  | X | The measure can be considered with possitive impact as the technical assistance will support the adaptation of the transport network to extreme weather events in order to meet the targets of strategic European and National documents related to adaptation to climate change. It will help for the improvement of the material and technical facilities of the National transport system and overcoming the road safety risk factors for meeting the chalanges of the adaptation to climate change. |
| Sustainable use and protection of water and marine resources |  | Х | The implementation of the measure is not expected to lead to a deterioration of the good ecological status or good ecological potential of water bodies, including surface and groundwater, or to a deterioration of the good ecological status of marine waters. The measure is not directly related to interventions in the Water sector, but part of the envisaged activities – for example environmental monitoring plan for the implementation of the PTC 2021-2027 and a manual for preparation and implementation of measures for mitigation of the negative impact on the environment in the implementation of the infrastructure projects under the PTC 2021-2027 ; development of action plans under Regulation (EU) 1143/2014 on the prevention and management of the introduction and spread of invasive foreign species make a positive contribution to the environmental objective when these activities relate to water bodies areas.  Therefore, and because of its nature, it is considered to comply with the DNSH principle for the environmental objective |
| The circular economy, including waste prevention and recycling |  | X | The technical assisstance have no foreseeable impact on the environmental objective related to the direct and primary indirect effects of the measure across its life cycle, given its nature, and as such is considered compliant with DNSH for the relevant objective.  The implementation of the measure will not lead to waste generation nor to usage of natural resources. The measure is not directly related to construction and installation works. |
| Pollution prevention and control to air, water or land |  | Х | The implementation of the measure will not lead to an increase in pollutant emissions into the air, water or land. The measure is not directly related to construction and installation works. |
| The protection and restoration of biodiversity and ecosystems |  | Х | The implementation of the measure will not harm the good status and resilience of ecosystems and biodiversity. The measure is not directly related to construction and installation works. Part of the envisaged activities – for example environmental monitoring plan for the implementation of the PTC 2021-2027 and a manual for preparation and implementation of measures for mitigation of the negative impact on the environment in the implementation of the infrastructure projects under the PTC 2021-2027 ; development of action plans under Regulation (EU) 1143/2014 on the prevention and management of the introduction and spread of invasive foreign species make a positive contribution to the environmental objective. |