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COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
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To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union
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Subject:	Proposal for a COUNCIL IMPLEMENTING DECISION amending Implementing Decision (EU) (ST 8091/22 INIT; ST 8091/22 ADD 1) of 4 May 2022 on the approval of the assessment of the recovery and resilience plan for Bulgaria

Delegations will find attached document COM(2025) 677 final.

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COM(2025) 677 final

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Proposal for a

COUNCIL IMPLEMENTING DECISION

amending Implementing Decision (EU) (ST 8091/22 INIT; ST 8091/22 ADD 1) of 4 May 2022 on the approval of the assessment of the recovery and resilience plan for Bulgaria

{SWD(2025) 349 final}

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Proposal for a

COUNCIL IMPLEMENTING DECISION

amending Implementing Decision (EU) (ST 8091/22 INIT; ST 8091/22 ADD 1) of 4 May 2022 on the approval of the assessment of the recovery and resilience plan for Bulgaria

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility, and in particular Article 20(1) thereof,

Having regard to the proposal from the European Commission,

Whereas:

(1) Following the submission of the national recovery and resilience plan ('RRP') by Bulgaria on 15 October 2021, the Commission proposed its positive assessment to the Council. On 28 April 2022, the Council approved the positive assessment by means of an implementing decision ('the Council Implementing Decision of 4 May 2022')[1]. The Council Implementing Decision of 4 May 2022 was amended by Council Implementing Decision of 8 December 2023[2] and Council Implementing Decision of 18 July 2025[3].

(2) On 9 October 2025, Bulgaria made a reasoned request to the Commission to make a proposal to amend the Council Implementing Decision of 4 May 2022 in accordance with Article 21(1) of Regulation (EU) 2021/241 on the grounds that the RRP is partially no longer achievable because of objective circumstances. On that basis, Bulgaria has submitted an amended RRP.

Amendments based on Article 21 of Regulation (EU) 2021/241

(3) The amendments to the RRP submitted by Bulgaria because of objective circumstances concern 83 measures.

(4) Bulgaria has explained that one measure is partially no longer achievable, because of a considerable increase of the cost of implementation of the measure due to inflation. This concerns C11.I1 Modernisation of long-term care. On this basis, Bulgaria has requested that the measure be amended. The Council Implementing Decision of 4 May 2022 should be amended accordingly.

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1 See documents ST 8091/22 INIT; ST 8091/22 ADD 1 at http://register.consilium.europa.eu

2 See documents ST 15837/23 INIT; ST 15837/23 ADD 1 at http://register.consilium.europa.eu

3 See documents ST 11242/25 INIT; ST 11242/25 ADD 1 at http://register.consilium.europa.eu

(5) Bulgaria has explained that five measures are partially no longer achievable because of unexpected delays in implementation. This concerns C1.I4 Youth Centres; C4.I9 Subsidy scheme – renovation of residential buildings; C10.I4 Improving the quality and sustainability of the security services; C12.I4 Establishment of an air ambulance system and C13.I1 Establishing an information system on energy poor and vulnerable households. On this basis, Bulgaria has requested to amend the aforementioned measures. The Council Implementing Decision of 4 May 2022 should be amended accordingly.

(6) Bulgaria has explained that nine measures have been amended to implement better alternatives in order to achieve their original ambition. This concerns C1.I3 Provision of digital skills training; C2.I1 Programme to accelerate economic recovery and transformation through research and innovation; C4.R1 Establishment of National Fund for Decarbonisation; C4.R6 Boosting electricity generation from renewable resources; C4.R11 Improving corporate governance of state-owned companies in the energy sector; C13.R1 Governance framework for energy poverty and preparation of retail market liberalisation; C8.R1 Strategic transport framework; C8.R4 Integrated public transport; and C10.R7 Improving the governance framework for state-owned enterprises. On this basis, Bulgaria has requested to amend the aforementioned measures. As those circumstances justify an amendment of the measures, the Council Implementing Decision of 4 May 2022 should be amended accordingly.

(7) Bulgaria has explained that 68 measures have been amended to implement better alternatives that allow the administrative burden to be reduced and simplify the Council Implementing Decision, while still achieving the objectives of those measures. This concerns C1.R1 Reform in the preschool and school education and lifelong learning; C1.I1 STEM centres and innovation in education; C1.I2 Modernisation of educational infrastructure; C2.R1 Common policy for the development of research and innovation; C2.I2 Enhancing the innovation capacity of the Bulgarian Academy of Sciences; C3.I1 Public support programme for the development of industrial districts, parks and similar territories and attracting investment (“AttractInvestBG”); C3.I2 Economic transformation programme; C4.R5 One Stop Shop for renovations; C4.R7 Unleashing the potential of hydrogen technologies and hydrogen production and supply; C4.R10 Decarbonisation of energy sector; C4.I1 Support for the renovation of building stock; C4.I2 Support for renewable energy for households; C4.I3 Support for energy-efficient street lighting systems; C4.I4 Digital transformation of the electricity transmission grid; C4.I7 Boosting the use of renewable energy from geothermal sources; C4.I8 National infrastructure for storage of electricity (RESTORE); C6.I1 Updating the strategic framework of the agricultural sector; C6.I1 Fund to promote the technological and ecological transition of agriculture; C6.I2 Digitalisation of processes from farm to fork; C7.R2 Efficient use of the radio frequency spectrum; C7.I1 Large-scale deployment of digital infrastructure; C7.I2 Construction, development and optimisation of the digital TETRA system and radio relay network; C8.R2 Road safety; C8.R3 Sustainable urban mobility; C8.R5 Electric mobility; C8.I1 Railways rolling stock; C8.I5 Road safety; C8.I6 Sofia metro line 3; C8.I7 Green mobility - pilot scheme to support sustainable urban mobility; C8.I8 Equipment for monitoring or maintenance of railway tracks and overhead lines; C8.I9 Renovation of railway infrastructure; C8.I10 New rolling stock for the Sofia metro; C9.R2 Continuation of the water sector reform; C10.R1 Accessible, effective and predictable justice; C10.R2 Anti-corruption; C10.R4 Strengthening insolvency procedures; C10.R5 Digital reform of the Bulgarian construction sector; C10.R6 Registry reform to unlock the potential

of eGovernment; C10.R8 Strengthening the anti-money laundering framework; C10.R10 Public Procurement; C10.R11 Entrepreneurial Bulgaria; C10.I1 Strengthening, further developing and building on the Unified Information System of Courts; C10.I2 Digitalisation of key litigation processes in administrative justice; C10.I3 Transformation of the information and communication infrastructure at the Public Prosecutor's Office; C10.I6 Supporting a pilot phase for the introduction of building information modelling; C10.I7 Unified Information System for Spatial Planning, Investment Design and Building Authorisation; C10.I10 Upgraded strategic planning system; C10.I11 Ensuring an adequate information and administrative environment for the implementation of the recovery and resilience plan; C11.R1 Reform of the minimum income scheme; C11.R2 Reform of social services; C11.I3 Development of the social economy; C11.I4 Modernisation of the Social Assistance Agency; C11.I6 Development of the cultural and creative sectors; C11.I7 Digitisation of collections of archives; C12.R1 Upgrading the strategic framework of the healthcare sector; C12.R2 Development of e-health and of the National Health Information System; C12.R3 Improving the attractivness of healthcare professions and promoting a more balance distribution of healthcare professionals across the territory; C12.R4 Strategic framework and plan to increase the availability of primary and outpatient care; C12.R5 Supporting the improved provision of preventive screening activities; C12.R6 Plan for modern health education in schools; C12.I2 Centres for interventional diagnosis and endovascular treatment of cerebrovascular diseases; C12.I3 Modernization of psychiatric care; C12.I5 National Digital Platform for Medical Diagnostics; C12.I7 Development of outpatient care; C13.R2 Transparency of connection procedures for new renewable and storage capacities; C13.R3 Improving the functioning of the balancing market and enabling demand-response; C13.I2 Scaled-up measure: National infrastructure for storage of electricity (RESTORE); C13.I3 Installation of Photovoltaic Systems and Provision of Electric Vehicles for Social Services Facilities; C13.I4 Support for new capacities for electricity generation from renewable sources and electricity storage.

(8) On this basis, Bulgaria has requested that those measures be amended. The Council Implementing Decision of 4 May 2022 should be amended accordingly.

(9) Following the decrease in the level of implementation of measures in accordance with Article 21 of Regulation (EU) 2021/241, Bulgaria has requested to use the resources freed up by the decrease in the level of their implementation to add one new measure and increase the level of implementation of three measures. This concerns C11.I8 Culture infrastructure; C11.I2 Provision of assisting devices to persons with permanent disabilities; C11.I5 Modernisation of the Employment Agency; and C12.I11 Modernisation of hospital facilities. On this basis, Bulgaria has requested that the level of implementation of three measures (C11.I2 Provision of assisting devices to persons with permanent disabilities; C11.I5 Modernisation of the Employment Agency; and C12.I11 Modernisation of hospital facilities) be increased and that one new measure (C11.I8 Culture infrastructure) be added.

Distribution of milestones and targets

(10) The distribution of milestones and targets in instalments should be amended to take into account the amendments to the RRP and the indicative timeline presented by Bulgaria.

Commission's assessment

(11) The Commission has assessed the amended RRP against the assessment criteria laid down in Article 19(3) of Regulation (EU) 2021/241.

Do no significant harm

(12) In accordance with Article 19(3), point (d), of and Annex V, criterion 2.4, to Regulation (EU) 2021/241, the amended RRP is expected to ensure that no measure (rating A) for the implementation of reforms and investments projects included in the RRP does significant harm to environmental objectives within the meaning of Article 17 of Regulation (EU) 2020/852 of the European Parliament and of the Council[4] (the principle of 'do no significant harm').

(13) The modified plan assesses compliance with the 'do no significant harm' principle following the methodology set out in the Commission's technical guidance on the application of 'do no significant harm' under the Recovery and Resilience Facility Regulation (2021/C58/01). Changes introduced in measures through the modification of the RRP do not affect the assessment carried out for the original version of the RRP. For what concerns the new investment introduced in the RRP (C11.I8 Culture infrastructure), Bulgaria provided an assessment of the measure against the principle of 'do no significant harm' in line with the Do No Significant Harm Technical Guidance (C/2023/111). The information provided allows to conclude that the modified plan is expected to ensure that no measure does significant harm within the meaning of Article 17 of Regulation (EU) 2020/852.

Contribution to the digital transition

(14) In accordance with Article 19(3), point (f), of and Annex V, criterion 2.6, to Regulation (EU) 2021/241, the amended RRP contains measures that contribute to a large extent (rating A) to the digital transition or to addressing the challenges resulting from it. The measures supporting digital objectives account for an amount which represents 20.7% of the amended RRP's total allocation calculated in accordance with the methodology set out in Annex VII to that Regulation.

(15) The positive assessment of the contribution to the digital transition provided in the Council Implementing Decision of 4 May 2022 remains valid. The amended RRP entails a reduction in implementation of two measures and the addition of one new investment C11.I8 Culture infrastructure that contribute to the digital transition or to addressing the challenges resulting from it. Despite the reduction in implementation, the inclusion of the new measure C11.I8 Culture infrastructure leads to a slight increase of the RRP's contribution.

Costing

(16) In accordance with Article 19(3), point (i), of and Annex V, criterion 2.9, to Regulation (EU) 2021/241, the justification provided in the amended RRP on the amount of the estimated total cost of the RRP is to a medium extent (rating B) reasonable and plausible, is in line with the principle of cost efficiency and is commensurate to the expected national economic and social impact.

(17) According to the information provided, the assessment of the cost estimates for the new measure and for the existing measures whose modifications entailed a new cost

[4] 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 (OJ L 198, 22.6.2020, p. 13, ELI: https://eur-lex.europa.eu/eli/reg/2020/852/oj/eng).

assessment show that most of the costs are reasonable and plausible. Only in a few cases, details on the methodology and assumptions used to make the cost estimates were limited. Furthermore, the changes in the cost estimates for the other modified measures were justified, proportional to the new revised targets and supported by detailed calculations and evidence, and as such the reasonability and plausibility of these cost estimates were not altered compared to the original RRP. Finally, the estimated total cost of the RRP is in line with the principle of cost-efficiency and commensurate to the expected national economic and social impact.

Any other assessment criteria

(18) The Commission considers that the amendments put forward by Bulgaria do not affect the positive assessment of the RRP set out in the Council Implementing Decision of 4 May 2022 on the approval of the assessment of the RRP for Bulgaria regarding the relevance, effectiveness, efficiency and coherence of the RRP against the assessment criteria laid down in Article 19(3), points (a), (b), (c), (da), (db), (e), (g), (h), (j) and (k).

Positive assessment

(19) Following the positive assessment by the Commission of the amended RRP, with the finding that the RRP satisfactorily complies with the criteria for assessment set out in Regulation (EU) 2021/241, in accordance with Article 20(2) of and Annex V to that Regulation, the reforms and investment projects necessary for the implementation of the amended RRP, the relevant milestones, targets and indicators, and the amount made available from the Union for the implementation of the amended RRP should be set out.

Financial contribution

(20) The estimated total costs of Bulgaria's amended RRP is EUR 6 174 106 145. As the amount of the estimated total cost of the amended RRP is equal to the updated maximum financial contribution available for Bulgaria, the financial contribution determined in accordance with Article 4a of Regulation (EU) 2021/1755 of the European Parliament and of the Council[5], and with Article 20(4) and Article 21a(6) of Regulation (EU) 2021/241 that is allocated for Bulgaria's amended RRP should be equal to EUR 6 174 106 145. Therefore, the financial contribution made available to Bulgaria remains unchanged.

(21) This Decision should be without prejudice to the outcome of any procedures relating to the award of Union funds under any Union programme other than the Facility or to procedures relating to distortions of the operation of the internal market that may be undertaken, in particular under Articles 107 and 108 of the Treaty. It does not override the requirement for Member States to notify instances of potential State aid to the Commission under Article 108 of the Treaty.

(22) The Council Implementing Decision of 4 May 2022 should therefore be amended accordingly. For the sake of clarity, the Annex to the Council Implementing Decision of 4 May 2022 should be replaced entirely,

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[5] Regulation (EU) 2021/1755 of the European Parliament and of the Council of 6 October 2021 establishing the Brexit Adjustment Reserve (OJ L 357, 8.10.2021, p. 1, ELI: http://data.europa.eu/eli/reg/2021/1755/oj).

HAS ADOPTED THIS DECISION:

Article 1
Approval of the assessment of the RRP

The assessment of the amended RRP of Bulgaria on the basis of the criteria provided for in Article 19(3) of Regulation (EU) 2021/241 is approved.

Article 2
Amendments

The Council Implementing Decision of 4 May 2022 on the approval of the assessment of the recovery and resilience plan for Bulgaria is amended as follows:

the Annex to the Council Implementing Decision of 4 May 2022 on the approval of the assessment of the recovery and resilience plan for Bulgaria is replaced by the text set out in the Annex to this Decision.

Article 3
Addressee

This Decision is addressed to the Republic of Bulgaria.

Done at Brussels,

For the Council
The President