БЪЛГАРСКА ВЕТРОЕНЕРГИЙНА АСОЦИАЦИЯ
+ 359 88 920 68 22
INFO@BGWEA.EU
WWW.BGWEA.EU
УЛ. ХРИСТО БЕЛЧЕВ 21, СОФИЯ 1000

Bulgarian Wind Energy Association
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To:

MR. DAN JØRGENSEN Commissioner Energy and Housing
Directorate-General for Energy (DG ENER)
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Cc:

MR. WOPKE HOEKSTRA Commissioner Climate, Net Zero and Clean Growth
Directorate-General for Climate Action (DG CLIMA)
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

MS. TINNE VAN DER STRAETEN
CHIEF EXECUTIVE OFFICER
WINDEUROPE
Rue Belliard 40
1040 Brussels
Belgium

Subject: Signal regarding disproportionate spatial restrictions on wind energy development in Bulgaria introduced via the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) of the Integrated National Energy and Climate Plan (NECP, 2024)

DEAR MADAMS AND SIRS,

On behalf of the Bulgarian Wind Energy Association (BGWEA), representing the wind energy sector in Bulgaria, we would like to raise a matter of strategic importance regarding the ongoing Environmental Assessment and Appropriate Assessment framework under Bulgaria's Integrated National Energy and Climate Plan (NECP 2024). We consider this issue highly relevant, as the proposed measures introduce a high risk to the future development of wind energy in Bulgaria, compromises the country's energy security, and directly undermines the deployment of renewable energy targets set out under the EU's RED III Directive.

It should be noted that wind energy deployment in Bulgaria remains significantly below the EU average, reflecting a slower pace of development compared to most Member States. Following the initial wave of development, no significant new wind generation capacity has been installed in Bulgaria since 2013. The country currently has approximately 715 MW of installed wind capacity, which in 2025 accounted for around

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3.1% of gross electricity generation. This further amplifies the importance of avoiding disproportionate constraints that may limit the sector's ability to contribute to EU-wide renewable energy targets.

Despite the urgent need for wind capacity, BGWEA is deeply alarmed by the measures proposed in Section 6.2 of the Appropriate Assessment (AA) Report for the NECP 2024. These measures introduce sweeping, blanket spatial restrictions on wind project development. Moving far beyond the legitimate boundaries of Natura 2000 protected areas, they groundlessly exclude entire geographical regions from future development.

The restricted territories specifically target the Dobrudja Region, which holds Bulgaria's highest wind potential, the Eastern Rhodopes, parts of the Burgas Region, as well as arbitrary 2 km and 6 km buffer zones around various protected areas. As demonstrated in the map compiled by BGWEA below (Figure 1), the prohibited zones (marked in pink) effectively lock out a massive, disproportionate percentage of the country's territory from wind energy development:

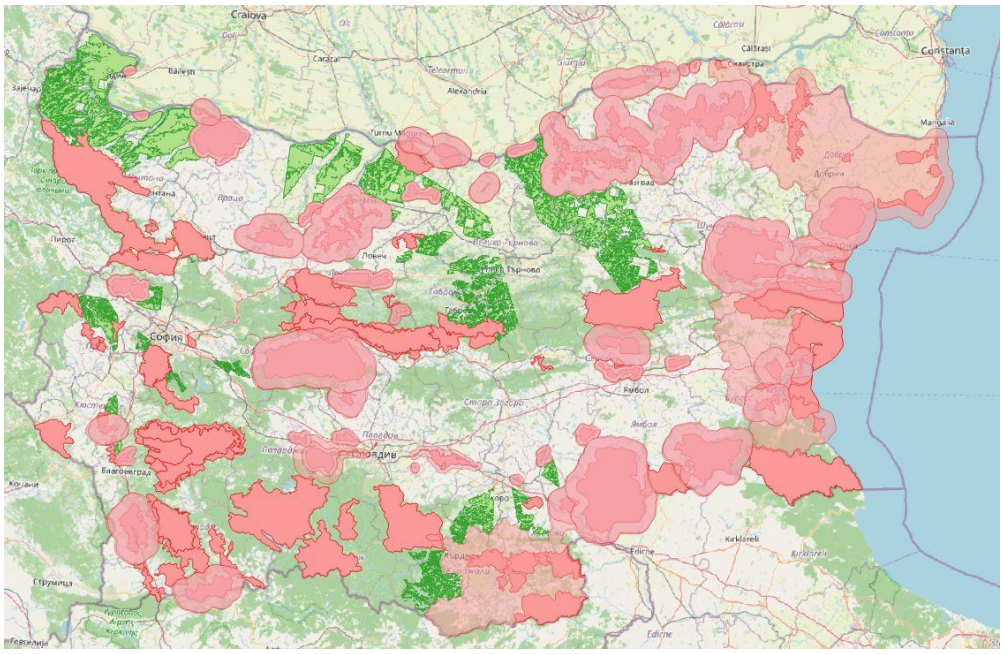


Figure 1. Map prepared by the Bulgarian Wind Energy Association (BGWEA), illustrating areas marked in pink where wind energy development is restricted based on the National Renewable Energy Action Plan (NREAP) 2012–2020. Data source: Appropriate Assessment (AA) of the Integrated National Energy and Climate Plan (NECP).

Regarding the legal framework, neither the Bulgarian Renewable Energy Sources Act (RESA), the Biological Diversity Act (BDA), nor the Environmental Protection Act (EPA) allows for wind energy development to be restricted solely to predetermined zones. Environmental legislation explicitly requires a case-by-case evaluation of each individual project through comprehensive SEA, Environmental Impact Assessment (EIA), and Appropriate Assessment (AA) procedures based on specific project merits.

Furthermore, these new restrictions are mechanically copied from the *National Renewable Energy Action Plan (NREAP) 2012–2020*, which is a normative document that has expired, holds no legal power, and is completely outdated. Applying its metrics on a strategic level in NECP directly violates the principles of legal certainty and proportionality.

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There is also a complete lack of scientific justification for the proposed 2 km and 6 km buffers. A large portion of these targeted lands consists of heavily anthropogenized agricultural terrain, which cannot be categorized as having automatic, high conservation value without a site-specific assessment.

In the absence of an explicit statutory ban, such restrictions cannot be imposed via a high-level strategic planning document without an updated, individualized scientific assessment.

The implications of this restrictive approach directly jeopardize European and national energy security, running entirely counter to the spirit of the RED III Directive by blocking access to the highest-potential wind regions.

Allowing the Bulgarian NECP to be adopted with these legally unfounded restrictions would set a dangerous precedent, demonstrating that outdated documents can be used to bypass proper legislative procedures and block EU-mandated climate goals.

The detailed legal and methodological arguments concerning these violations, formally filed with the Bulgarian Ministry of Energy under **Ref. No. E-92-00-725/08.06.2026** and are attached to this signal for your review.

In conclusion, the wind energy sector in Bulgaria is already advancing slowly due to complex and lengthy permitting procedures. Compared to other EU Member States, Bulgaria has very limited installed wind power capacity, and the sector is further affected by the current revenue cap and other regulatory and financial burdens that discourage foreign investments.

Against this background, the restrictions set out in this document would severaly paralyze and limit the sector growth. In practice, these will eliminate investor confidence and will halt new wind energy projects entirely.

We respectfully request that DG Energy reviews these developments within the context of the Bulgarian NECP evaluation to ensure compliance with EU renewable energy expansion targets, the principles of proportionality, and the legal frameworks governing the European energy market.

We would appreciate your feedback on this matter and your support, within the remit of the DG Energy, in addressing the issues raised and identifying a solution that is fully compliant with European Union law.

BGWEA remain at your disposal for any additional information and would welcome the opportunity to contribute to further dialogue on this matter.

For ease of reference, we enclose, as Annexes 1 and 2, the Bulgarian Wind Energy Association's (BGWEA) Position Papers on the Appropriate Assessment Report and the Strategic Environmental Assessment Report for the Draft Integrated National Energy and Climate Plan of the Republic of Bulgaria – 2024 Update.

Yours faithfully,



Miglena Stoilova
Chair of BGWEA