



To:
Bulgarian Minister of Environment and Water
Mr. Neno Dimov

Cc:
Bulgarian Minister of Energy
Ms. Temenuzhka Petkova

Brussels, 24 January 2018

RE: Bulgaria's decision to challenge air pollution control measures (LCP BREF) undermines EU efforts for clean air and threatens people's health

Dear Minister Neno Dimov,

The Health and Environment Alliance (HEAL) is contacting you regarding Bulgaria's recent decision to join the court case (Court of Justice, Case T-699/17) with Poland against the revised Directive 2010/75/EU of the European Parliament and of the Council for large combustion plants (notified under document C(2017) 5225), Commission Implementing Decision (EU) 2017/1442 of 31 July 2017 establishing best available techniques (BAT) conclusions.

HEAL is dismayed to see Bulgaria working against this important air pollution control measure, when at the same time air quality is a priority of your country's EU presidency. We were pleased to see that Bulgaria put air quality at the top of its environmental agenda and took this as a sign you were seriously intending to lead by example to curb the air pollution in your country and EU wide.

We believe that by supporting abovementioned court case Bulgaria is undermining its own intention of tackling air pollution, sending the wrong signal to other EU countries, at a time when the EU Commission is pushing for greater commitment for air quality and endangering the health of Bulgarians and Europeans.

The recently adopted Decision on best available techniques (BAT) within Directive 2010/75/EU would bring many benefits, including to people's health in the region and beyond. In Bulgaria only, the full implementation of this Directive would mean reducing the number of early deaths from air pollution from 1,570 to 250 deaths per year; while the EU-28 wide number of premature deaths would drop from 22,900 to 8,900¹. With the new LCP BREF, Bulgaria would save health costs of up to 3,680 billion Euro

¹ Report [Lifting Europe's Dark Cloud - How cutting coal saves lives](#)



per year just by implementing BAT for large combustion plants, which would mean less air pollution from coal power generation. These savings could be used to improve public health and the environment in Bulgaria.

The continued reliance on coal power would not only undercut the necessary air quality efforts, but also cause significant health costs to the people in the Bulgaria and the EU.

It is both in Bulgaria's interest and responsibility to ensure that Directive LCP BREF is fully implemented and no actions are taken that would negatively affect people's health. Therefore we call on you to walk the talk on air quality and withdraw from the joined legal action.

In view of the public interest of this matter we intend to make the letter more widely known.

We thank you for considering the issue and remain at your disposal for any further questions.

Anne Stauffer

Director for Strategy and Campaigns

HEAL