

In Sofia, Bulgaria, 30 November 2018.

Health professionals on derogations for coal power plants: no exemptions for pollution

To:

Director of the Executive Environmental Agency, Georgi Balchev
Minister of Environment and Waters, Neno Dimov

We, the undersigned medical experts, health and patients organisations, representing the interests of public health, experts in clinical medicine, general practitioners, doctors of environmental medicine, pulmonologists, allergists, cardiologists as well as patients, have adopted the following opinion.

Recommendations that we issue addressing Bulgarian authorities who are deciding on the process of 'derogations'. Derogations are requests by coal plant operators in Bulgaria to be exempted from rules established to further limit health-harming air polluting emissions, as foreseen in the EU law regulating large combustion plants, including coal plants (Derogations according to Art. 15 sec. 4 of the EU Directive on Industrial Emissions (2010/75/EU)).

We highlight that:

Air pollution is a global health risk.

Worldwide, air pollution is recognised as the top environmental cause of premature mortality, as shown by the Global Burden of Disease, Injuries, and Risk Factor Study¹. In 2016 outdoor air pollution in both cities and rural areas caused 4.2 million deaths worldwide^{2,3}. In 2016, 91% of the world's population did not breathe clean air, and more than half of urban population were exposed to outdoor air pollution levels at least 2.5 times above the safety standard set by WHO⁴. Air pollution has also just been recognised as the fifth leading risk factor for chronic disease.

Emissions from coal power plants contribute to poor air quality

Despite improvements in air quality in the EU, air pollution remains an important health risk factor responsible for over 400,000 premature deaths each year. There is also evidence for specific sources of

¹ <http://www.healthdata.org/GBD>

² Global Health Estimates 2016: Deaths by cause, age, sex, by country and by region, 2000–2016. Geneva: World Health Organization; 2018 (http://www.who.int/healthinfo/global_burden_disease/estimates/en/index1.html).

³ Public health and environment [online database]. Global Health Observatory (GHO) data. Geneva: World Health Organization (<http://www.who.int/gho/phe/en/>).

⁴ World health statistics 2018: monitoring health for the SDGs, sustainable development goals. Geneva: World Health Organization; 2018. Licence: CC BY-NC-SA 3.0 IGO.

exposure. Last updates of the “Europe’s Dark Cloud: How coal-burning countries are making their neighbours sick” exposed the substantial health impacts of Europe’s coal fired power stations. It found that European coal plants are responsible for around 19,500 premature deaths per year.

Bulgaria: significant health impacts and costs due to coal power plant emissions

In 2015, emissions from Bulgarian coal power plants led to significant health impacts with 1,150 premature deaths, 560 cases of chronic bronchitis, 790 hospital admissions, 28,000 asthma attacks in children, and 298,000 lost working days. All of those health impacts are estimated to be producing costs of 1,725-3,229 million EUR yearly.

Bulgaria: Health benefits of refusing derogations pollution exemptions

The implementation of new pollution limits in Bulgaria would result in health benefits across EU, such as a reduction of 900 premature deaths per year. It would mean a reduction of 670 of cases of bronchitis in adults yearly, a reduction of 33,080 days of children suffering from asthma symptoms, an increase in 354,000 days of productivity (in working population). This could result in reducing the health costs by 1,960-3,680 billion EUR yearly; from current health costs of 2,330-4,380 billion EUR reduction to 370-700 billion EUR a year)⁵.

Measures are needed to protect public health and reduce the health burden on society

Full implementation of new limits are necessary to protect public health, save lives and reduce health burden to society. Improved environmental performance standards and stricter limits for pollution from coal power plants could help tackle dangerous and costly air pollution. A revised EU’s ‘LCP BREF’, a technical document outlining best practices for industry, aims to lead to tougher new pollution limits and has the potential to reduce the number of premature deaths caused by coal power plants in EU-28 from 19,500 (in 2015) to 2,600 deaths per year.

Under the Directive for large combustion plants (Directive 2010/75/EU of the European Parliament and of the Council, notified under document C(2017) 5225)) a number of coal plants in Bulgaria applied for derogations, namely, Maritsa East 1, Maritsa East 2, Maritsa East 3, Sliven, Brikel and Ruse.

In order to (1) improve air quality, (2) reduce the incidence of respiratory, cardiovascular and other diseases related to air pollution, and (3) reduce long-term economic costs for the health system:

We, the undersigned public health advocates would like to state following recommendations to the authorities when deciding on derogations:

1. No derogations should be granted.

The IED provides one final derogation that can be used to give permission to pollute beyond the levels set in the Conclusions on Best Available Techniques (BAT Conclusions). The BAT Conclusions for large combustion plants are a binding decision which sets stricter emission limits which have to be adhered to by August 2021. However, Art. 15 sec. 4 of the EU Directive on Industrial Emissions (2010/75/EU) enables the authorities to grant a derogation from these emission limits, only where an assessment shows that the achievement of

⁵ EEB, HEAL, CAN Europe, WWF European Policy Office, Sandbag. Lifting Europe’s Dark Cloud. 2016.

emission levels associated with the best available techniques as described in BAT Conclusions would lead to disproportionately higher costs compared to the environmental benefits due to the geographical location, the local environmental conditions or the technical characteristics of the installation concerned. The deciding authority of the Member State – Bulgaria – should refuse to grant any Article 15(4) derogations.

2. Include scientific assessment of health benefits achieved by derogations when deciding on the “disproportionately higher costs compared to the environmental benefits”

Governments should pre-empt deadlines to improve the health of their citizens and save costs to their health services faster. Investment in pollution-reducing techniques should lead to significant drops in net emissions and not be used as justification to extend plant life.



The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 70 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.