



## SOFIA CITY COUNCIL

Dear Sirs

Fifteen months ago several representatives of EIB visited Sofia and held meetings with representatives of Sofia Municipality and Toplofikacia Sofia EAD to discuss the already 10 years old project for integrated waste management of Sofia and the proposed RDF incineration plant at the site of the above-mentioned company. At certain part of those meetings some of the signatories of this letter, but not all - municipality councilors and members of respective committees were invited to join in the discussion. As we recall the major reason for your colleagues was the assessment of the so called political risk of financing this notorious project by your institution.

As of March 2018 we would like to update you on the situation the way we see it and invite you to reevaluate your further involvement in the project. We highly appreciate your commitment and support to promising and sustainable projects and initiatives, however we believe much has changed since then regarding environmental and funding priorities and the application or lack of best practices at local ground.

We are quite sure that the pending approval for the third and final phase of the integrated waste management project in Sofia should be thoroughly revised to match the current realities and to fit into implementation of all new EU legislation on circular economy and in pursuing global goals for sustainable development and resource efficiency or at the very least take account of improved technologies. As the major financial hand of EU we believe EIB is deemed and focused to follow such developments and adjust its lending portfolio towards upper levels of the waste hierarchy and flexible infrastructure avoiding technological lock-in.

More specifically, we are concerned about these aspects of the proposed RDF incineration project in Sofia:

- Lack of political and public consensus
- Lack of transparency and involvement in the processes
- Lack of proper assessment of alternative technologies and solutions
- Health and environmental concerns

The contentiousness of the project is witnessed by the long and heated discussion among Sofia Municipal Councilors in the vote on the project held July last year when again the project documents were declared as work in progress and thus confidential. The final vote shows that only half of councilors have no doubts about the project, and the others have serious and increasing concerns about various aspects of the proposal.

Up to now, over ten years after the inception of this plan, real debates were and are still not possible, as even we, the councilors, do not have efficient access to feasibility studies, CBA, assessments and analyses and cannot therefore ensure informed and open debate, or allow us to construct an informed position on our own.

In the past years numerous citizens and civil society organizations have signed petitions, filed complaints and gone to court against the RDF incineration project, but the lack of public information is still a fact. The national ombudsman has also issued a statement demanding more transparency on the project.

Public concern about Sofia's air pollution problem has grown sharply in the past two years. Unlike previous public discussions of the project's environmental impact assessment report, the public discussion about a 67 million Euro loan from EIB to this project, held on 28 February 2018 at Sofia Municipal Council Hall, was attended by far more people than the venue could have fit. The outcome of the meeting was clearly moot, as multiple concerns were raised about the project. Instead of improving public opinion about the project, deliberate withholding of vital information about the project's financial, social health, environmental and other aspects has had the contrary effect. The resignation of Toplofikacia Sofia's CEO just a week before the public hearing has cast additional doubt over the project.

The plant is going to be an additional source of air pollution on top of consistently over-the-limit pollution in Sofia - the most polluted with particulate matter (PM) capital city of Europe. The proposed facility would be a significant emitter and this is not to mention the

pollution from the heavy logistic of transportation into and out of the designated plant site.

There are opinions that the project is in non-compliance with, and deviates from, preferred waste treatment options in the waste hierarchy, as well as from the new circular economy agenda. EU and EIB, national and local public funds are about to be spent on long-lived large-scale infrastructure with a heavy technological "lock-in" effect diverting recyclable, compostable and even reusable waste towards less preferred and more environmentally damaging incineration.

This investment will consume valuable and scarce funds, slow down or maybe even block for years the implementation of a progressive waste reduction and recycling system while preparing Sofia to achieve the new recycling and other targets by 2030, specified in the Circular economy legislative package. There is a need of justification that proves separate collection and recycling is not technically, environmentally and economically practicable, as specified by the Waste Framework Directive 2008/98/EC.

The European Commission's recent communication on the role of waste-to-energy in the circular economy<sup>1</sup> clearly puts the priority on prevention and recycling, and not waste incineration. It warns that "...mixed waste as a feedstock for waste-to-energy processes is expected to fall as a result of separate collection obligations and more ambitious EU recycling targets" and clearly states that "...investments in treatment facilities for residual waste, such as extra incineration capacity would only be granted in limited and well justified cases, where there is no risk of overcapacity and the objectives of the waste hierarchy are fully respected."

We call upon the EIB to support investments into prevention, improving separate waste collection and recycling in Sofia, in line with circular economy priorities and targets and in the interest of local and European citizens and taxpayers.

To that end we would expect EIB to reevaluate, adjust or reconsider its involvement into the project through additional round of discussion meetings and talks with all stakeholders, including all councilors, willing to take part.

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<sup>1</sup> COM(2017) 34 final Communication from the Commission on The role of waste-to-energy in the circular economy, Brussels, 26.1.2017: <http://ec.europa.eu/environment/waste/waste-to-energy.pdf>

We, in our capacity as councilors, are committed to taking decisions of high public concern in a process of informed debate, while drawing on expert knowledge. Our obligation and responsibility is to seek, find and approve only the best possible solutions for our City and Municipality sustainable and evolutionary development.

Sincerely,

Ivan Velkov



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Political Group "Five"

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