

Integrated actions for joint coordination and responsiveness to flood risks in the Cross Border area

Deliverable 3.3.4

**Analysis of functionality, feasibility and effectiveness of the strategy and
necessary correction after 1-year testing period on the Bulgarian territory**

The Project is co-funded by the European Regional Development Fund and by national funds of the countries participating in the Interreg V-A “Greece-Bulgaria 2014-2020” Cooperation Programme.

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Final report representing the results of the pilot testing of the Strategy and the analysis of the functionality, applicability and effectiveness of the strategy after the pilot testing

In implementation of Contract 45/13.04.2023 "Testing of the Strategy for the interrelationship between the prevention and response for flood protection of the institutions from the Bulgarian side on Bulgarian territory." Analysis of the functionality, applicability and effectiveness of the Strategy and necessary corrections after its testing on Bulgarian territory"

This report contains summary information on the implementation of the **First and Second Stage** of Contract 45/13.04.2023 with the subject: Testing of the Strategy for the interrelationship

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between prevention and response for flood protection of the institutions from the Bulgarian side on Bulgarian territory.

Pilot testing of the Strategy

The purpose of pilot testing is to check whether the Strategy has a real application and whether the goals and priorities set in it will be achieved through the measures set out in the Roadmap.







For this purpose, within the framework of the pilot testing, test cards were developed for each measure to make the link goals-measures-results, to identify the monitoring mechanism of the respective measure, the time frame for its application and indicators to track its application, as well as possible risks for their implementation and measures to overcome these risks.

The results of the testing show that the main purpose of the Strategy for the connection between the prevention and response for flood protection of the institutions from the Bulgarian side is to determine the main strategic priorities for improving the interaction and efficiency in the work between the individual responsible institutions, to identify specific measures and actions to improve the overall coordination and cooperation between the various institutions having a role in flood risk management and increasing its effectiveness at the national, regional, municipal and local level.

Emphasis is placed on improving flood risk management mechanisms, ensuring changes to existing planning legislation and flood mitigation actions.

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As part of the pilot testing, test cards were developed for each of the 29 strategy measures, a test card was developed to make the *objectives-measures-results* link. The test card included the following components, on the basis of which the measure was pilot tested:

-  expected results of its implementation
-  contribution to flood prevention
-  contribution to flood response
-  monitoring mechanism
-  risks that could prevent its implementation
-  proposals for risk prevention/minimization measures





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-  suggestions for alternative activities
-  period of execution

The testing of the strategy found that it has a real application and the measures laid down in the Roadmap are fully oriented to the goals and priorities laid down in it.

Despite the overall well-built framework, it is worth pointing out the following shortcomings that the testing found:

-  A number of specific measures and accompanying actions have been identified, many of which are too detailed and are rather organizational issues that should be resolved operationally;
-  A large volume of analyzes is planned, without planning the implementation of the specific actions behind them (such as creating a unified information system, improving MTB) and which would achieve a real effect;
-  The intended responsible institutions are not always the most appropriate;
-  Specific indicators for tracking the implementation and the result of the application of the measure are not always proposed;
-  The time frame is extremely general - 2021-2023 and currently needs updating;
-  Emphasis is placed on the regions and municipalities, it is necessary to include the basin directorates as leading institutions in the flood risk management process;
-  The strategy does not consider the role of the existing Water Coordinating Council and Disaster Risk Reduction Council, which are associations at the national level that support the normative process and have the capacity to assist with financing issues;
-  The Strategy and the role of the Disaster Risk Reduction Council (DRR), where disaster protection is jointly planned at the regional and municipal level, is not considered;
-  The focus of the strategy has shifted from the link between prevention and response to regulatory changes and mechanisms for managing and coordinating the flood risk management process as a whole.



Given that the strategy has not officially entered into force, the possibilities for evaluating its implementation are limited. However, there are real actions on the part of the governing institutions, which correspond to the specific measures set out in the road map. They are considered in the evaluation. The results obtained from the studies in the first stage of the present project are the basis for summarizing general conclusions and recommendations. An essential point included in the present analysis is the consultation of the interested parties, carried out through an online questionnaire. In addition, the proposals made by the interested parties during a working meeting with representatives of the institutions working in the field of flood protection to present the results of a developed project of a Strategy for interrelationships between prevention and response for flood protection for the Bulgarian institutions and obtaining of comments. Through this approach, the current analysis and the subsequent adjustment of the strategy take into account the opinion and recommendations of key institutions.

Functionality

The main objective of the Strategy for the interrelationship between the prevention and response for flood protection of the institutions from the Bulgarian side on the Bulgarian territory is to determine the main strategic priorities for improving the interaction and efficiency in the work between the individual responsible institutions, to identify specific measures and actions for improvement of the overall coordination and cooperation between the various institutions having a role in flood risk management and increasing its effectiveness at the national, regional, municipal and local level. Emphasis is placed on improving flood risk management mechanisms, ensuring changes to existing planning legislation and flood mitigation actions. With the development of the Strategy, the aim is to guarantee the coordinated solution of the problems with the perspective of developing the administrative capacity for flood risk management in the long term.

In the strategy itself, 4 goals are set, for each of which priorities are identified and a direction for specific measures is set. In the road map to the strategy, the goals and priorities for them are calibrated, with specific actions, deadlines, persons responsible for their implementation and indicators being marked.

Bearing in mind the ambitions laid down in the strategy, it includes goals and measures with a focus that addresses all the problems identified to be solved by balancing activities that are sufficiently specific and feasible.

A main problem that initially faces the strategy is related to the mechanisms for its application - the strategy is created by institutions operating at the basin and local level, and the measures and activities that are undertaken require the intervention of institutions at the national level, political decisions, as well as mechanisms available only to the state apparatus.

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Recommendations:

- ✓ To synchronize the strategic goals and priorities in the Strategy and the road map to it.
- ✓ The strategy should also be discussed at the national level.

Applicability

The test of the feasibility of the strategy was carried out by the pilot testing, which aims to check whether the Strategy has a real application.

The testing of the strategy established that it has a real application and the measures laid down in the Road Map are fully oriented to the goals and priorities laid down in it .

Despite the overall well-built framework, it is worth pointing out the following shortcomings that the testing found:

- ☞ A number of specific measures and accompanying actions have been identified, many of which are too detailed and are rather organizational issues that should be resolved operationally.
- ☞ A large volume of analyzes is planned, without planning the implementation of the specific actions behind them (such as creating a unified information system, improving MTB) and which would achieve a real effect.
- ☞ The intended responsible institutions are not always the most appropriate
- ☞ Specific indicators for tracking the implementation and the result of the application of the measure have not always been proposed
- ☞ The time frame is extremely general - 2021-2023 and currently needs updating
- ☞ Emphasis is placed on the regions and municipalities, it is necessary to include the basin directorates as leading institutions in the flood risk management process
- ☞ The strategy does not address the role of the existing Water Coordinating Council and Disaster Risk Reduction Council, which are national-level associations that support the process normatively and have the capacity to assist with funding issues.
- ☞ the Disaster Risk Reduction Council (DSRR), where disaster protection is jointly planned at district and municipal level, is not considered.
- ☞ The focus of the strategy has shifted from the link between prevention and response to regulatory changes and mechanisms for managing and coordinating the flood risk management process as a whole



Recommendations:

The test maps developed for testing the strategy indicate the shortcomings, risks and suggestions for improvement for each activity. They should be considered when developing the final version of the Strategy and the road map to it.

Efficiency

Regarding the effectiveness and extent to which the strategic plan achieves the intended goals and objectives: According to the conducted pilot testing, for the period 2020-2023, the following steps have been taken in the direction of achieving the goals defined in the Strategy for the link between prevention and response for flood protection of the institutions from the Bulgarian side

- Classification of dams in degrees of danger
- Updated the FRMP update process
- In the regulatory framework, it is determined that preventive activity is carried out with the aim of reducing the risk of disasters and includes the collection, storage and sharing of data on damage and losses from disasters.
- The Directorate "Water Management" in the MoEW provides a unified approach to the financing of the programs from measures in the RBMP through the EU funds, EPA and from the state budget.
- The Directorate "National Coordination Center" in the MoEW participates in the operational management of surface waters in the event of emergency situations in the event of floods or drought, carries out general and methodical guidance, coordination and control of the activities of the basin directorates.
- Establishment of Municipal Disaster Risk Reduction Councils with main tasks: develop and coordinate activities for the implementation of the municipal disaster risk reduction program; develops, revises and updates the municipal disaster protection plan; reviews and prepares an annual report to the District Council on disaster risk reduction, on the state of disaster protection on the territory of the municipality.
- Building, maintaining and expanding the system for early warning of the population and executive authorities through the use of modern technologies - Indicator: Access to the maps in real time via the Internet for monitoring the development of rainfall areas for information in situations of floods and forest fires (Artist NIMH);
- As a result of the revision and updating of the PFRA for the West Aegean Basin Management Region, 17 ASPFR have been determined, of which 3 are new. They are

located in the three main rivers - on the Struma River (10), on the Mesta River (6) and on the Dospat River (1).

- It is also important to create RAP passports that summarize useful information for each RAP related not only to flood risk but also to future developments, including climate change and development plans
- The early warning and disclosure are carried out by the RCN/DCN in the administrative center of the district, and now also by the municipality by order of the director of the ASPFR.
- Changes in the functions of the NIMH to develop and maintain a system for the unified exchange of information at the basin and national level between the Ministry of Environment and Water, the Executive Agency for the Environment, the basin directorates for water management and the National Institute of Meteorology and Hydrology under the Minister of environment and waters;
- Projects for increasing the qualifications of responsible employees in the reaction-prevention process, as well as the population, have been implemented/are being implemented.
- Stakeholders are involved in the process of updating PFRA. Again, information deficits were found. Stakeholder activity remains relatively low.

Recommendations:

Implementation of more activities in the direction of:

- ✓ Improving the process of collecting and storing data, preparing a unified information system
- ✓ Paying special attention to the financial provision of the implementation of flood prevention and response activities
- ✓ Staffing of flood prevention and response activities

Feedback from the responsible institutions involved in the field of FRM

Agreeing on strategy documents is an important moment, preparing the public for their implementation and helping to gain support and buy-in from stakeholders. As part of the implementation of the project "Integrated actions for joint coordination and response to reduce the risk of floods in the transboundary area", financed under the INTEREG V-A Greece-Bulgaria 2014-2020 Program, a series of meetings were held, at which the main problems of prevention and response for flood protection of institutions from the Bulgarian side on Bulgarian territory. During the discussion, the following comments and proposals were received, which will serve in finalizing



the developed Strategy for the connection between prevention and response for flood protection of the institutions on the Bulgarian side. Specific suggestions received from participants include:

STRATEGIC OBJECTIVE No. 1: Increase the effectiveness of institutions in the implementation of flood risk management activities at all levels

Priority 1.1. Creation of normative and organizational prerequisites for improving coordination between individual institutions

- Priorities at the district level - low supply of human resources
- Regulatory framework - breaks down the obligations of the levels at the lowest level, which is not secured financially and with personnel resources
- Department of EYA to the district - need for more resources
- Change in the layout plans in the administrations – but the trend is fewer people, charged with more responsibilities, optimization
- Creation of the Working Group, which will also include persons from responsible institutions at the central level, who, together with the responsible persons from lower levels, will discuss the possibilities for real solutions to the problems
- Mechanism for proposals for changes/reforms initiated at the local level to reach the institutions at the central level and to ensure the possibility of realization and hearing of the proposals
- A clear listing of responsibilities in normative/sub-normative regulations and in the institutions themselves

Priority 1.2. Improved institutional framework ensuring clarity and specificity in flood risk management responsibilities.

Specific activities:

- Better flexibility of institutions and documents, outside the planning period it is difficult to make changes
- Too many control bodies that drop sanctions, it is necessary to have a fund to ensure the measures, and not to look for sporadic funding;
- Ordinance for the collection of damage statistics will enable the application to international funds, which is a financing channel
- Legal regulation of land use in the context of flood risk management - Disaster protection plans - lack of legal leverage to make municipal plans, cumbersome procedure with the council
- Insurance legal and regulatory changes in relation to flood risk management - local insurance fund, limited resource, study of foreign insurance experience
- Need for insurance and specialized training of volunteers

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- Entering the duties and responsibilities under the FRM in the job descriptions of the relevant employees
- Development of instructions outlining the distribution of roles and actions of the responsible specialists in the FRM
- Scheduled standard procedures in DG “FSCP” - need to update names and terminology in order to correspond between different institutions.
- A mechanism for adequate payment against imputed additional responsibilities
- Need for a Unified Information System - for all responsible institutions to be one, with functionalities to ensure the needs of the institutions. To be normatively defined with a clear description, to thoroughly study the needs, means of support
- Need to create a separate Disaster Unit, a separate structure at national/district/local level.
- Need for uniform instructions for response and operation
- Instructions outlining the distribution of roles and actions of the responsible specialists in the FRM
- Unified rescue system

Priority 1.3. Active partnership and cooperation between bodies engaged in flood risk management activities

Specific activities:

- Creation of a mechanism regulating the obligations and the way of providing information related to flood risk management
- Information - which also serves for publicity. Lack of historical data. Need for legal regulation of data collection and secured funding. /example: every 6 years the database collects information, but not at a central level/;
- Monitoring and evaluation of actions taken to reduce flood risk. Criteria what and how it should be filled
- Monitoring and evaluation of the actions taken to reduce the risk of floods - indicators are available in the municipal plans

STRATEGIC OBJECTIVE #2: Increase administrative / institutional capacity for flood risk management

Priority 2.1 Improving the coordination and structures of the administrations involved in the FRM at the district, basin and municipal level

Specific activities:

- Transformation of the basin councils to the BD into bodies with clear rights and responsibilities for flood risk management, which at the moment are more informative-consultative

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- Trainings - available at the IPA, lack of financial resources for inclusion in trainings, low interest, need to exchange experience between institutions, online training

Priority 2.2 Development of the qualifications of personnel engaged in flood risk management

Specific activities:

- Creating prerequisites for effective transfer of experience and guaranteeing continuity in the administration - introduction of internal rules and instructions for transfer upon leaving and vacating a position

STRATEGIC OBJECTIVE #3 Introduction of flood risk financial management policies

Priority 3.1 Improved understanding of the current allocation, use and funding needs for the FRM

Specific activities:

- Quantification of past damages and losses from floods and general budgetary needs - prerequisite - creation of an information provision system
- Overview of the available funding mechanisms and sources (at national and EU level), determining the levels of responsibility of the state and the various authorities in terms of funding -
- the financing mechanisms in the budget - earmarked funds, fund for the implementation of FRMP
- Organization of additional training of the municipalities for the preparation of quality projects when applying for funding to the Interdepartmental Commission for Recovery and Assistance to the Council of Ministers
- Good practice – presence of a separate project unit in the administrations
- Reduction of the minimum mandatory period for issuing opinions on admissibility with the FRMPs when applying with financing projects - now it is 7 days, proposal for 3-5 days and for permits
- Project for the creation of a single coordinating body with powers and a coordinating function in relation to national investments for FRM (Responsible institution: Ministry of Interior)
- Creation of a mechanism to coordinate and stimulate measures to reduce the risk of floods, supported by the EU and the national budget - regional governments can only apply for one project per year
- Deployment of public awareness campaigns on the financial management of flood risk - part of an overall campaign

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Priority 3.3 Strengthen investment planning for flood risk reduction

Specific activities:

- Lack of specific specialists to carry out investment planning
- To involve businesses and citizens in the investment planning process

The set priorities and measures in the strategic goal were recognized by those present as necessary, fully and clearly outlined.

Prerequisites that guarantee a timely response:

- ✓ Every municipality has developed a Disaster Protection Plan that describes all the response steps to be followed in the event of a flood
- ✓ A working Disaster Management Headquarters
- ✓ A working District Security Council - to which there is a 24/7 emergency telephone number to which signals can be sent
- ✓ According to the powers of the mayor, if there is information about an impending disaster, he can call a preventive meeting and form a headquarters to declare a state of emergency or determine the implementation of specific preventive activities
- ✓ Funding available to the Interagency Commission for Disaster and Accidents at the Ministry of the Interior
- ✓ Periodic checks to describe critical areas

Identified issues:

- ✓ Insufficient financial resources in the Regional and municipal administrations aimed at prevention
- ✓ Insufficient targeted and urgently available financial resources, complex procedures for obtaining resources
- ✓ The importance of the Municipal Council for Disasters is underestimated
- ✓ Existence of duplicative activities attributed to different institutions under different laws.
- ✓ Low staffing of the responsible institutions and lack of continuity, insufficient pay

In order to expand the range of respondents, a survey of interested parties was undertaken through an online questionnaire. The focus of the questionnaire was on the set priorities and measures in front of the strategy and whether they meet the approval of the interested parties. This report presents the findings of the survey.

The activity with which the most significant disagreement was expressed (47%) is part of Priority 1.2. An improved institutional framework ensuring clarity and concreteness in flood risk management responsibilities, namely *Designation of a special unit in all administrations that have regulated legal powers under FRM.*

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Disagreement of 33.3% was also expressed with the activity Allocating a separate staff member in the structure of the regional and municipal administrations, specialized in FRM, part of the same priority.

There are many activities with which unanimous agreement was expressed by all respondents, with particularly strong support being expressed for Priority 3.1 Improved understanding of the current allocation, use and funding needs for FRM and Priority 4.1 Strengthening partnership with the scientific community to conduct specialized research on the objectives of developing, monitoring and evaluating climate change adaptation policies and programs.

Conclusions:

In view of the results of the pilot testing, the conclusions of the analysis of the functionality, applicability and effectiveness, the conducted survey and meetings with interested parties, as well as on the basis of the overall review of the changes in the regulatory framework and strategic documents, as well as the projects that came into force, we can make the following basic recommendations for correction and update regarding the Strategy for the interrelationship between prevention and response for flood protection of institutions from the Bulgarian side on Bulgarian territory:

- ☞ Synchronization of the goals and priorities laid down in the strategy and those foreseen in the road map
- ☞ Updating the roadmap according to progress and regulatory changes
- ☞ Establishing specific indicators to track the implementation and the result of the application of the measure
- ☞ Updating the time frame and establishing a chronological order of execution of the activities
- ☞ Inclusion of basin directorates as leading institutions in the flood risk management process
- ☞ Inclusion of the Water Coordination Council and the Disaster Risk Reduction Council as open collective bodies
- ☞ Improving the process of collecting and storing data, preparing a unified information system
- ☞ Paying special attention to the financial provision of the implementation of flood prevention and response activities
- ☞ Staffing of flood prevention and response activities