

TRANSPORT MODE	Code	Transport problems	Impact of the problems on the objectives																	Problem areas									Impact nature				
			Strategic objective				Priority				Specific objective									Organisation			Infrastructure			Operation			Social	Economic	Environmental		
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19												
TRANSPORT IN GENERAL	P-T	1	Delay in repair activities and poor maintenance of the good condition of the railway network.	2	1	7	1	5	6	22	23	4	14	16						√	√		√	√	√		√		√	√	√		
	P-T	2	Many of the assets related to the track have expired life. There are many temporarily imposed speed restrictions in the railway network. Current speeds are 20-30% lower than design speeds for the track. The railways and other fixed assets are not sufficiently used. There is a large reserve capacity.	2	1	7		5		22	23	4	14								√					√		√	√	√			
	P-T	3	Bulgaria is in 102nd place out of 148 countries where the quality of infrastructure, according to the Global Competitiveness Report for 2013-2014 of the World Economic Forum. This reflects the long-term chronic underfunding of the national road system, as Bulgaria has a great need for maintenance and modernization of roads, hindering the necessary economic growth.	1	5	1	7			4	1	2	3	14	22	23					√		√	√	√		√		√	√	√		
	P-T	4	It is necessary to ensure long-term, predictable funding to enable the realization of meaningful, coherent and sustainable policy on transport infrastructure.	1		5	1	6	7	14	1	2	3	4	17	18	22	23	24	26	27	√	√		√	√	√	√		√		√	√
	P-T	5	There is no unit responsible for applied research activities within the MTITC, which will prepare and market scientific and applied products for transport servicing, including collection, processing and analysis of statistical data related to transport and transport activities.	1		2				7												√	√		√	√	√		√		√	√	
P-RW	P-RW	1	The requirement that the state provides incentives for the infrastructure manager to achieve higher quality indicators during the operation of the railway infrastructure in order to reduce the cost of providing access to the railway infrastructure and the amount of infrastructure charges actually has not been implemented. According to the signed contract of NRIC with the State, funds for such incentives are included in the annual subsidy and the railway infrastructure manager has no interest in obtaining them.	1		2				6	7										√	√		√	√	√		√		√	√		
	P-RW	2	Failure of the Republic of Bulgaria to correctly transpose and implement into national law the requirements of Directive 2004/49/EC relating to the independence of the investigative body, sufficient resources for career development and financial independence of the investigating authority and independence in the investigation of accidents and incidents.	3		9				30	31	32										√	√				√		√	√			
	P-RW	3	There are numerous inaccuracies established in the transposing of the Interoperability Directive in the national law, and any subsequent modification of Decree No. 57 brings new requirements of the amendments to Directive 57, but do not correct the underlying and reported inaccuracies.	2		6				19												√	√		√	√		√		√	√		
	P-RW	4	Ordinance No. 57 specifies for the Designated authority to assess national safety rules, rules which are not subject to evaluation and should be checked by the NSA via SMS.	3		9				30	31	32										√	√		√	√		√		√	√		
	P-RW	5	Ordinance No. 57 specifies in great detail the requirements for the commissioning of new structural subsystems, while requirements for commissioning of the upgraded/renewed subsystems, which is the most common case in national projects, are outlined much more generally and vaguely.	3		9				30	31	32										√	√		√	√		√		√	√		

P-RW	6	Ordinance No. 57 provides a step to define the scope of the modernization/renovation (submission of a dossier under Art. 45 (1)). This step shall logically be executed at the beginning of the project, but due to unclear defined moment of execution, the applicant carried it out at the end of the project and which makes it difficult to define the scope of implementation of the modernization/renovation, the EC verification and evaluation, as well as the need to assess the compliance with the national notified technical rules. There is uncertainty about who practically defines the scope of the modernization/renovation of a structural subsystem – the Applicant, NSA or NB. The required risk assessment should be made at the beginning of a significant change but in practice this is done at the end of the project, which renders the assessment useless and it also makes it impossible to implement adequate and timely steps to reduce the risk, i.e. there is no legal obligation to carry out this assessment at the beginning of the project and it is only a recommendation.	1	2	7																		√	√											√	√								
P-RW	7	The cumbersome and uncertain process of commissioning of the subsystems leads to the exploitation thereof without being put into operation according to the requirements of Ordinance 57 and there are no measures/sanctions provided for this to happen.	1	2	7																			√	√										√	√								
P-RW	8	There is ambiguity, both at national and European level, to define when a subsystem is new, when it is modernized and when it was renovated according to the different definitions in different sub-regulations. In most railway projects in Bulgaria there is modernization or renovation carried out of a subsystem or part of subsystem, leading to the issuance of interim certificate of verification (ISV) of this subsystem. This makes it impossible for putting in operation due to the requirement to present EC verification certificate (Certificate of verification).	1	2	7																			√	√											√	√							
P-RW	9	The last amendment to Interoperability Directive introduces Certificate of verification and repealed the EC certificate and this change is not reflected in Ordinance No. 57, which leads to a contradiction in the documents issued by the NB.	2	6	19																			√	√									√	√	√	√							
P-RW	10	The available national technical rules are outdated and have not been notified to the European Commission and published in the NOTIF-IT database, leading to their non-transparency and unenforceability. There are contradictions in the technical requirements in the national and the European legislation.	3	9	30	31	32																	√	√										√	√	√							
P-RW	11	The provisions for equalization in the annual balance sheet of the railway infrastructure manager of revenue from infrastructure charges, surpluses from other commercial activities, government funding and other revenue and cost of the railway infrastructure are still not respected.	1	2	6	7																	√	√										√	√									
P-RW	12	The financial situation and the serious indebtedness of the Group of companies of Holding BDZ EAD is quite serious.	1	2	6	7																		√										√										
P-RW	13	Lack of funding provided for implementation of the Strategy and National Plan for the deployment of ERTMS system – for road equipment (for lines outside the scope of projects built with European funding) and on-board equipment.	1	1	2																			√		√	√	√						√	√				√	√				
P-RW	14	Missing or poor integration between the railways and other modes of public transport in many places (distance between the stations of the settlement, lack of public transport to the station, a lack of harmonised schedule).	2	7	21	24																		√		√	√	√	√					√	√				√	√				
P-RW	15	There is no specialized unit for analysis and forecasts of the functioning of the railway sector.	1	2	7																			√	√											√	√							
P-RW	16	There is no provided long-term targeted funding for the purchase of advanced equipment, including traction and non-traction rolling stock.	1	5	13																			√										√	√				√	√				
P-RW	17	There is no administrative structure in NRIC assigned with the specific function in connection with the TSI Infrastructure. The specified Strategy and Plan for implementation of the TSI Infrastructure are not bound by specific administrative bodies responsible for the implementation thereof. The national legislation does not define specifically the administrative procedures and structures which are responsible for subsystems that are not put into operation.	1	2	7																			√		√	√	√	√											√				

P-RW	51	The main problems have been identified that lead to a deterioration in the quality of the transport service, problematic access to information; broken or inappropriate signals; unclear pricing; problems with possibilities for reservation; conditions in trains and stations; unsuitable platforms or those that do not meet hygiene standards; lack of toilets; difficult access for people with disabilities to the platform, to the station, to service facilities, to the train; too little time for boarding the train; not reporting the change of the platform at intersections; two trains departing from the same platform with very little difference in time, while there are many unused platforms; not counting the multimodal transport - poor organization and management, and even lack of connection with other modes of transport; delays; irregular schedule of local connections; cancellations without prior warning; insufficient care for passengers.	1																✓	✓	✓	✓					✓	✓	
	51	There is a trend of deepening the deficit of qualified and experienced executive personnel due to the relatively low pay and lack of prospects for development.	3				9												✓	✓						✓	✓	✓	
	52	Various distances in the railway transport system are used.	1				2												✓	✓						✓	✓	✓	
	53	A change in legislation for railways is required.	2				6												✓	✓	✓	✓				✓	✓	✓	
	54	Stricter tariff policy for BDZ-PP.	2				7												✓	✓						✓	✓	✓	
P-RD	1	The existing system of vignettes does not ensure collection of all fees, it is not fair for consumers (billing is based on the duration of access to the road network and not on the basis of distance travelled) and society (does not meet the "polluter pays" principle and does not account for the different effects of various PPP on infrastructure).	1				1												✓	✓						✓	✓		
	2	Unsatisfactory ongoing maintenance of the roads leading to the establishment of a lasting trend of deterioration.	1				1	5	7										✓	✓						✓	✓		
	3	Revenues from vignette fees decreased after 2014 and cover only about 20% of the running costs of the regional road network, they cannot provide funds for rehabilitation, reconstruction and construction of the National Road Network.	1				1																				✓		
	4	Lack of advanced intelligent transport systems in operation.	1				2													✓							✓	✓	✓
	5	The quality of the passenger bus services decreased, resulting in decrease of the value of the utility function.	2				7																				✓	✓	
	6	Lack of strategic documents on the priorities and the stages of projects for infrastructure development.	1				2													✓	✓						✓		
	7	Ineffective implementation of procedures for the award of public contracts and inadequate funding, leading to delays in implementation of planned projects.	1				2													✓	✓						✓		
	8	Poorly developed network of motorways and speed roads. Motorways have a total length of 734 km. or 3.7% of the national road network.	2				7	6																			✓	✓	✓
	9	The greater part of the road infrastructure is not built by EU standards.	1				5													✓	✓						✓	✓	✓
	10	Lack of bypass roads in many major cities, causing heavy transit traffic in urban areas.	2	1			7	5	1																		✓	✓	✓
	11	Deteriorated age structure of the vehicle fleet. The majority of the registered vehicles are older than 20 years - 39% of vehicles in operation.	1				5													✓	✓						✓		
	12	The largest share of cars not having Eurostandards - 33.40 %, 24.40 % of the vehicles have Euro 1 and only 4.20% of the cars have Eurostandards 5.	3				8													✓	✓						✓		
	13	The largest share of energy consumption in the Transport sector is road transport. The greatest consumption of fuels is for diesel engines. There is a small share of renewable energy in fuel consumption.	1				5													✓	✓						✓		
	14	Increase in the total number of accidents which have occurred and the number of deaths occurring due to road accidents.	3				9													✓	✓						✓		
P-M	1	Low reliability of port infrastructure for the needs of port facilities and land area with parameters that conform to the trend of increasing size of ships.	1				1	5												✓	✓	✓	✓				✓		
	2	Limited draft approaches and water areas of the main Bulgarian seaports. Limited air clearance for ships entering the Varna lake.	1	2			1	6												✓	✓	✓	✓				✓		
	3	The depth in front of the quays in many ports/terminals is insufficient and limited draft/size of the visiting ships at the port. Deepening in front of the pier over the design values of existing structures of piers is impossible in practice requires new construction.	1				1													✓	✓	✓	✓				✓		
	4	Delays in the implementation of rehabilitation works after the onset of the need to restore the design depths of waterways and water areas of ports, leading to the imposition of long-term limits in draft of the ships.	1				1													✓	✓	✓					✓		

P-M	5	Insufficient information about the design parameters and load-bearing capacity of piers and hydraulic structures, lack of passport, evaluation and reporting of physical and moral wear.	1			2				6																√			√			√			√				
P-M	6	Built early last century the port facilities in Varna (terminal port Varna-East), Burgas (terminal port Burgas-East 1), and in Pomorie, Tsarevo, Ahtopol fall within the bounds of the central part of cities, which creates certain problems for hygiene requirements for health protection of the urban environment.	3	2		8	6			28	18																√			√			√			√			
P-M	7	Limited opportunities for development of terminals located in the central part of the respective settlements.	1			1	3			4	8															√	√		√	√				√		√			
P-M	8	For some port terminals (TPP Varna Petrol Varna and Rosenets) territory - public property is insufficient and diverse ownership of different parts of the port infrastructure - buildings, storage facilities, transshipment and transport facilities and links create compelling functional barriers and limiting their functions.	1			1				4																√	√		√	√	√	√			√		√		
P-M	9	Poorly constructed connections or historically conditioned limited access to "essential facilities" (i.e. common industrial railway tracks) connecting more than one port for public transport with regional and/or national importance to the national road and railway network (result of different types of functionality of port infrastructure prior to the privatization of the industrial complexes, some of which are for service activities where port facilities are built which are currently public transport ports of regional significance).		1		7	3			21	23	9														√		√	√	√			√	√		√	√		
P-M	10	Insufficient investment in maintenance and improvement of port infrastructure.	1			1				1	2	3	4													√	√		√	√	√	√			√		√		
P-M	11	There is insufficient development of public-private partnerships and the lack of investor interest from strategic investors.	1			1				3																	√		√	√	√			√	√		√	√	
P-M	12	Insufficient degree of concession and under-investment in maintenance and development of ports, which reflects on the adaptability and reliability of port infrastructure to the needs of market demand.	1			1				3																√		√	√			√	√		√	√	√		
P-M	13	Difficulties of existing legislation on the development and construction of new ports and port terminals in the aquatic environment.	1			2				7																√		√	√	√	√			√		√	√	√	
P-M	14	Gap in the legislation on port spatial planning that facilitates the expropriation procedures allowing for the removal of such "bottlenecks".	1			1				4																√	√		√	√	√	√			√				
P-M	15	Insufficiently constructed specialised terminals.	1			1				4																	√		√	√	√			√	√		√	√	
P-M	16	The unsatisfactory condition (exhausted lifecycle) of the structure and parameters of port facilities, loading equipment and technologies that do not meet today's rapidly changing trends in the structure and size of cargo turnover and cargo traffic.	1			5				14																	√		√			√				√	√		
P-M	17	Shortage of modern logistics and information systems.	1			3	2			8	6																√		√				√		√	√		√	√
P-M	18	Strong competition from foreign ports in the region with better port facilities and access to most countries in Eastern Europe.	1			1				4																	√		√	√	√			√	√		√	√	
P-M	19	Security measures in ports are not sufficient. There is a need to improve the security of ships and ports, and port safety by improving the control of cargo and passengers.	3			9				29																	√	√		√	√				√				
P-M	20	Incomplete infrastructure and facilities for intermodal transport.	1			3				8	9																√		√	√	√	√			√	√		√	√
P-M	21	There is no working model of total port with appropriate regulatory mechanisms to prevent the so called "Cannibalized cargo", with the result that individual freight provider prefer to build "green" new own port facilities for their "own" goods in case of free available capacity and sufficient capacity – spreading of investment resources.	1			2				7																	√	√		√	√	√	√			√		√	
P-M	22	The current legislation model does not allow the prepared hitherto long-term strategies and programs for development of the port system of the country to ensure a consistent and sustainable basis for planning the necessary capacity of port facilities and establishing the needs of national and European public and fair financing of port infrastructure.	1			2				7																	√	√		√	√			√		√			
P-M	23	Financing of port infrastructure in the neighbouring ports (including also the countries – non-members of the EU) increases the risk of inefficiency and instability of investment.	1			4				11	12																√		√				√		√	√			

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P-M	24	Lack of a system and conducting data monitoring on the capacity of major ports in the network, taking into account and analysing plans of member - states and non-member states to implement their long-term strategies in view of the fact that significant differences in different regions of Europe, the lack of common European strategic insight which ports need funding and the currently established simultaneous investment from neighbouring ports with a similar capacity, although excess capacity in the neighbouring port, the low and slow return on investment, which alone can give a realistic assessment of their effectiveness makes it even more important fact that the timeliness of investments is crucial to their effectiveness in such a competitive environment as maritime transport (transport companies can decide to change its ports to stopover in accordance with its own network approach).	1			2														√	√							√	√
P-M	25	Missing or inadequate road and/or rail connections with the hinterland, which imposed the need for additional (public or private - in accordance with the established system of property ownership of individual elements of the port our system) funding and the lack of a legislative solution that would guarantee the possibility made in the past port investment is fully operational with the economic efficiency in the adequate use of existing capacity.	2			7														√	√							√	√
P-M	26	Risk of distortion of competition between ports, market distortion and reflection of the implementation of commitments by poets and upcoming concession contracts (risk of costly litigation and creating an atmosphere of unpredictability and uncertainty in the overall investment climate for the sector) as a result of the possibility of provide indirect public support for economic operators who do not pay market price for the use of port infrastructure.	1			1	4				1	10	11							√	√							√	√
P-M	27	Insufficient funding in the national budget on infrastructure, which is operated economically and does not constitute state aid within the meaning of Art. 107, § 1 of the Treaty, for example. facilities for the needs of the common navigation including inland waterways; flood protection and management of low water levels and infrastructure, including the information that is not used to provide goods and services at market conditions.	1			1					1	2								√	√							√	√
P-M	28	Incompleteness, including at European level, of common rules on financial transparency and formation of infrastructure charges - the adopted legislative model implies limited autonomy of the public port infrastructure company in forming the size of port taxes and limited indirect influence in shaping the size of prices providers of port services, as well as total disbursements while maintaining a significant share in the burden of BPIC investment responsibilities.	1			1	4				1	10								√	√							√	√
P-M	29	Need to change the model of financing public infrastructure company, which guarantees the fulfilment of its statutory functions while maintaining the conditions for fair competition in the market for port services.	1			1	4				1	11	12							√	√							√	√
P-M	30	The total time for ship services including ship and cargo clearance procedures (documentation, security, customs, quarantine inspection, etc.), preparation of ship loading/unloading/departure deployment of dock equipment and exchange of goods is quite long.	1			2					7									√								√	√
P-M	31	Insufficient compliance of the energy performance of buildings with the legal requirements for energy efficiency.	1			5					14										√							√	√
P-IW	1	Understated parameters of the ship (depth, width and curve radius) in sections of the waterway for low water levels.	1			6	1	5			19	4	14							√								√	√
P-IW	2	Rapid change in the levels of the Danube River and a big difference between the minimum and maximum water levels in the Bulgarian-Romanian section leading to difficulty in shipping in one case and flooding and the danger of accidents at the other, in both cases strongly impeding and/or preventing the safe and effective operation of ports.	1			6	1	5			19	4	14							√								√	√
P-IW	3	Underinvestment in maintenance and repair of the existing infrastructure as well as new infrastructure.	1			1					1	2	3	4						√	√							√	√
P-IW	4	Insufficient information about the design parameters and load-bearing capacity of piers, no passport, evaluation and reporting of physical and moral deterioration.	1			2					6										√							√	√
P-IW	5	Limited opportunities for development of terminals located in the central part of the respective settlements.	1			1	3				4	8								√	√							√	√

P-IW	6	Built early in the last century the port facilities in Ruse, Svishtov, Tutrakan and Lom fall within the bounds of town centres and the handling of certain types of cargo creates certain problems with hygiene requirements for health protection of the urban	3	1		8	3			28	8										√	√					√					√		
	7	Poorly constructed connections to the national road and railway network or historically conditioned restricted access to port terminals.	2			7				20											√	√	√	√	√		√	√			√	√		
	8	Insufficient effective handling of ships in ports where piers are inclined and when there is low water in the Danube River the accosted ships are away from the top edge of the piers and the quay and much of the machines does not have the required range.	1			1				4											√	√	√	√	√		√	√			√			
	9	The unsatisfactory condition (exhausted lifecycle) of the structure and parameters of port facilities and transshipment equipment, inefficient port technologies that do not meet today's rapidly changing trends in the structure and size of cargo turnover and	1			5				14											√	√			√	√					√	√		
	10	Insufficient specialization of the terminals.	1			1				4											√	√	√	√	√	√					√	√		
	11	Lack of specialized facilities for handling containers.	1			3				8											√	√	√	√	√	√					√			
	12	Inefficient use of ferry terminals. Reducing traffic of ro-ro freight after commissioning of the Danube Bridge -2.	1			3				8											√				√	√	√			√				
	13	Intermodal terminals connecting the ports to railways are not sufficiently developed.	1			3				8											√	√	√	√	√	√	√	√			√			
	14	There is a gap in the legislation on port spatial planning that facilitates the expropriation procedures allowing for the elimination of such "bottlenecks".	1			1				4											√	√		√	√	√	√			√				
	15	There is no working model of total port with appropriate regulatory mechanisms to prevent the so called "Cannibalized cargo", with the result that individual freight provider prefer to build "green" new own port facilities for their "own" goods in case of free available capacity and sufficient capacity – spreading of investment resources.	1			2				7											√	√		√	√	√	√			√				
	16	Security measures in ports are not well developed. There is a need to improve the security of ships and ports, and port safety by improving the control of cargo and passengers.	3			9				29											√	√			√	√				√				
	17	Insufficient compliance of the energy performance of buildings with the legal requirements for energy efficiency.	1			5				14											√				√					√		√		
	AIR TRANSPORT	P-A 1	Lack of developed strategy on the development of airport infrastructure.	1			1			4											√						√	√			√	√		
		P-A 2	Deteriorated infrastructure of airports.	1			1			2	4										√			√	√	√		√	√			√	√	
		P-A 3	Reduced efficiency of operation and maintenance of the system of infrastructure charges in air transport.	1			4			10	11	12									√	√								√	√			
		P-A 4	Possibility for exhausting the capacity of the passenger terminal at the Sofia Airport.	2			7				22											√	√					√	√			√	√	
	INTERMODAL TRANSPORT	P-IM 1	Lack of legislation.	1			3	4	6	8											√	√								√	√			
P-IM 2		Lack of incentives for carriers to use intermodal transport.	1			3	4		9	10	11	12								√	√								√	√				
P-IM 3		Lack of network operating intermodal terminals covering the Bulgarian sections of the European transport corridors.	1			3			8	9														√				√	√	√	√			
P-IM 4		Insufficient specialization of existing terminals, meeting the requirements for modern cargo transport services.	1			1			2	3	4										√	√	√	√	√		√	√	√	√	√			
P-IM 5		Lack of modern logistics and information systems of the terminals.	1			2			5	6											√				√	√	√	√	√	√	√	√		
P-IM 6		Lack of established special administrative structure.	1			2			7												√	√							√	√				
P-IM 7		Limited opportunities for development of terminals located in town centres and lack of storage facilities.	1			3			8															√	√	√		√	√					
P-IM 8		Lack of coordination between transport modes towards the development of intermodal services.	2			6	7			16	17	21	24	26														√	√			√	√	√