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Country Report — Republic of Bulgaria

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Marine Cluster Bulgaria

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Table of Contents

Table of Contents	2
Executive Summary.....	5
List of Abbreviations.....	7
Section 1: Institutional Mapping.....	9
1.0 Introduction.....	9
1.1 National and Regional Authorities.....	9
1.1.1 Ministry of Transport and Communications.....	9
1.1.2 Ministry of Agriculture and Food	10
1.1.3 Ministry of Environment and Water.....	10
1.1.4 Ministry of Regional Development and Public Works	11
1.1.5 Ministry of Tourism	11
1.1.6 The Ministry of Culture.....	11
1.1.7 Ministry of Energy	12
1.1.8 Ministry of Innovation and Digital Transformation.....	12
1.1.9 Ministry of Defence	12
1.1.10 Ministry of Interior	13
1.1.11 The Ministry of Education and Science.....	13
1.1.12 Ministry of Economy, Investments and Industry	13
1.1.13 Ministry of Foreign Affairs	13
1.1.14 Regional and Local Authorities	14
1.2 Research and Education	15
1.2.1 Institute of Oceanology — IO-BAS.....	15
1.2.2 Bulgarian Ship Hydrodynamics Centre (BSHC).....	15
1.2.3 Institute of Biodiversity and Ecosystem Research (IBER-BAS).....	15
1.2.4 National Institute of Meteorology and Hydrology (NIMH-BAS).....	15
1.2.5 Institute of Geophysics, Geodesy and Geography (IGGG-BAS).....	15
1.2.6 Institute of Fisheries and Aquaculture (IFA)	15
1.2.7 Institute for Underwater Heritage (UNESCO Category 2 Institute)	16
1.2.8 Nikola Vaptsarov Naval Academy (NVNA).....	16
1.2.9 Technical University of Varna (TU-Varna).....	16
1.2.10 University of Economics — Varna (UE-Varna) and College of Tourism.....	16
1.2.11 University of Architecture, Civil Engineering and Geodesy (UACEG)	16
1.2.12 Trakia University – Stara Zagora.....	16
1.2.13 Technical University of Sofia	16
1.2.14 Varna Free University ‘Chernorizets Hrabar’	16
1.2.15 Burgas Free University (BFU).....	17
1.2.16 Prof. Dr. Assen Zlatarov University (Burgas)	17
1.2.17 Vocational School of Maritime Navigation and Fishing 'Sveti Nikola' (Burgas)	17
1.2.18 Sveti Nikolay Chudotvorets Varna Maritime High School	17
1.2.19 Vocational School of River Shipbuilding and Navigation (Ruse).....	17
1.2.20 Bulgarian Maritime Training Centre (BMTC)	17
1.2.21 Medical University of Varna (MU-Varna).....	17
1.3 Blue Economy Stakeholder Organisations	18
1.3.1 Marine Cluster Bulgaria (MCB).....	18
1.3.2 Maritime Transport (Shipping, Shipbuilding/Ship Repair, Ports, and Supporting Services).....	18

1.3.3 Fisheries and Aquaculture	19
1.3.4 Coastal and Maritime Tourism	20
1.3.5 Ecology	20
1.3.6 Other Civil Society Organisations	21
1.4 Summary and Key Observations	21
<i>Section 2: Legal and Strategic Framework.....</i>	<i>23</i>
Introduction to Section 2	23
2.1 Global and International Governance Framework.....	23
2.1.1 United Nations Convention on the Law of the Sea (UNCLOS) and Maritime Jurisdiction	23
2.1.2 International Maritime Organization (IMO)	24
2.1.3 UN Sustainable Development Goals, Biodiversity Framework, and International Blue Economy Declarations	24
2.2 EU-Level Framework	25
2.2.1 EU Strategic Approach to the Black Sea	25
2.2.2 Common Maritime Agenda for the Black Sea (CMA)	26
2.2.3 Regional Governance: Bucharest Convention and the Black Sea Commission	26
2.2.4 Overarching EU Maritime Policy	27
2.2.5 Marine Environment and Spatial Planning	28
2.2.6 Biodiversity and Environmental Protection	28
2.2.7 Fisheries and Aquaculture	29
2.3 National Blue Economy Strategies and Policies.....	29
2.3.1 Maritime Spatial Plan 2021–2035 (MSP)	29
2.3.2 Marine Strategy of the Republic of Bulgaria 2022–2027	30
2.3.3 Integrated Transport Strategy 2030 — Maritime and Inland Waterway Transport	31
2.3.4 Other Key National Strategies	31
2.4 Legislative Analysis	35
2.4.1 Primary Maritime Legislation	35
2.4.2 Environmental and Planning Law	35
2.4.3 Sectoral Laws	36
2.4.4 Institutional Framework for MSP Implementation	37
2.5 Alignment with the Common Maritime Agenda for the Black Sea.....	37
2.5.1 How National Goals Correlate with CMA Priorities	37
CMA Goal 1: Healthy and Resilient Marine and Coastal Ecosystems	37
2.5.2 CMA Alignment Rating Summary	39
2.6 Regional and Local Strategies	40
2.6.1 Overview	40
2.6.2 National Spatial Framework — National Concept for Spatial and Regional Development (NCSRD) 2026–2040	40
2.6.3 Regional Level: Integrated Territorial Strategies (ITS)	41
2.6.4 Local Level: Municipal Integrated Development Plans (MIDP)	41
2.6.5 Community Level: Fisheries Local Action Groups (FLAG)	42
2.6.6 Port Infrastructure: BPIC and the Green Transition	42
2.6.7 EIT Water Black Sea Regional Hub	42
2.6.8 Key Gaps at Regional and Local Level	42
2.7 Alignment and Coherence	43
2.7.1 How We Assess Alignment	43
2.7.2 Areas of Effective Vertical Alignment	43

2.7.3 Identified Gaps in Vertical Alignment	43
2.7.4 Three Structural Coherence Gaps.....	44
2.7.5 Cross-Level Alignment and Coherence: Summary Assessment.....	45
2.7.6 Implications for the BlueDial Project	46
3.1 Overview of Bulgaria's Blue Economy	47
3.1.1 Sector Maturity Classification.....	48
3.2 Tier 1 — Established Sectors.....	49
3.2.1 Marine Living Resources — Fisheries and Aquaculture	49
The commercial fisheries sub-sector remains structurally limited: an ageing, small-scale fleet (average 23 years; 27% reduction since 2007) and per capita fish consumption that is the second lowest in the EU-28. Total commercial catch in 2023 was 6,704 tons — a recovery of +19.8% over 2022 driven by sprat (3,264 t), but significantly below historical baselines due to regional unstable geopolitical situation in the Black Sea. National aquaculture production stood at 14,388 tons in 2023 (740 active farms; 21 marine).	52
3.2.2 Coastal and Maritime Tourism.....	52
3.2.2a Maritime Cultural Heritage	53
3.2.3 Maritime Transport and Shipping	54
3.2.4 Port Activities and Logistics	56
3.2.5 Shipbuilding and Ship Repair	59
3.2.6 Marine Non-Living Resources	61
3.3.2 Marine Biotechnology.....	63
3.3.3 Ocean Monitoring and Data.....	65
3.3.4 Maritime Infrastructure (Submarine Cables, Pipelines, Coastal Engineering)	66
3.4 Tier 3 — Nascent and Pre-Commercial Sectors	67
3.5 Summary — Sector Mapping Matrix.....	68
<i>Section 4. Funding Instruments for the Blue Economy in Bulgaria</i>	<i>70</i>
4.1 National and Nationally Managed Funding Programmes.....	70
4.2.1 Programme "Competitiveness and Innovation in Enterprises" (PCIE) 2021–2027	70
4.2.2 Programme "Research, Innovation and Digitalisation for Smart Transformation" (RIDST) 2021–2027	70
4.2.3 Programme "Education" 2021–2027 and Programme "Human Resources Development" (HRD) 2021–2027	71
4.2.4 Programme "Environment" 2021–2027.....	71
4.2.5 Programme "Regional Development" 2021–2027	71
4.2.6 Programme "Transport Connectivity" 2021–2027	71
4.2.7 Programme for Maritime Affairs, Fisheries and Aquaculture (PMFA) 2021–2027	72
4.2.8 Recovery and Resilience Plan (RRP)	72
4.3 EU Programmes	73
4.3.1 Connecting Europe Facility (CEF).....	73
4.3.2 Horizon Europe — Mission 'Restore our Ocean and Waters by 2030'	73
4.3.3 Interreg NEXT Black Sea Basin 2021–2027	74
4.3.4 LIFE Programme	75
4.3.5 Innovation Fund	75
4.3.6 Interregional Innovation Investments (I3).....	76
4.3.7 EIT Water — Emerging Knowledge and Innovation Community.....	76
4.4 International Finance and Private Investment.....	76
4.4.1 BlueInvest and EIF / EIB Group.....	76
4.4.2 Private Venture Capital and Private Equity.....	77

4.4.3 Blue Finance Instruments — Blue Bonds and Public-Private Partnerships	78
4.5 Accessibility and Effectiveness of Funding Instruments	78
4.5.1 Barriers to Access	78
4.5.2 Gaps in Funding Coverage.....	79
4.5.3 Outlook: The 2028–2034 Multiannual Financial Framework.....	80
<i>Section 5. Stakeholder Consultation Results.....</i>	<i>80</i>
5.1 Methodology and Respondent Profile.....	81
5.2 Perceptions of the Strategic and Legal Framework.....	82
5.3 Institutional Framework and Cooperation	83
5.4 Funding Instruments and Accessibility	84
5.5 Business Environment and Blue Skills	85
5.6 Subnational Priorities and Recommendations	86
5.7 Synthesis and Key Findings	87
<i>Section 6. Potentials and Gaps (SWOT Analysis)</i>	<i>88</i>
6.1 Strengths and Opportunities.....	88
6.1.1 Established Sectors as an Economic Foundation	88
6.1.2 Emerging Sectors and Innovation Potential.....	88
6.1.3 Funding Portfolio, Institutional Assets, and Cooperation Opportunities	89
6.2 Weaknesses and Gaps.....	89
6.2.1 Institutional and Governance Fragmentation	89
6.2.2 Capacity, Skills, and Technical Expertise Gaps	89
6.2.3 Funding Access and Sector-Specific Gaps.....	89
6.2.4 Spatial Concentration and Missing Actor Coordination.....	90
6.3 Synthesis	90
Section 7. Conclusions and Recommendations	90
7.1 Key Conclusions.....	91
7.2 Recommendations	91
7.2.1 Policy Improvements.....	92
7.2.2 Institutional Strengthening.....	92
7.2.3 Funding Optimisation.....	92
7.2.4 Enhancing Black Sea-Level Cooperation.....	92
ANNEX I. Legal and Regulatory Instruments Applicable to Bulgaria’s Blue Economy.....	94
<i>References</i>	<i>98</i>

Executive Summary

The methodology of the BlueDial Report on State of the Art for Bulgaria combines desk research, document analysis, institutional mapping, funding assessment, sectoral analysis, and stakeholder

consultation to provide a comprehensive assessment of the national Blue Economy framework. The report is structured into seven interrelated sections, each addressing a specific dimension of the Blue Economy ecosystem.

Section 1 – Institutional Mapping identifies and analyses the key actors involved in the governance and development of the Blue Economy in Bulgaria, including national and regional authorities, research and academic institutions, business support organisations, industry associations, civil society organisations, and relevant Black Sea cooperation networks. The analysis examines institutional roles, responsibilities, and coordination mechanisms.

Section 2 – Legal and Strategic Framework reviews the policy and regulatory environment governing the Blue Economy at European, national, regional, and local levels. The assessment covers relevant EU directives and strategies, national legislation, sectoral and cross-sectoral policy documents, regional and municipal development strategies, and evaluates their alignment with the Common Maritime Agenda for the Black Sea (CMA).

Section 3 – Funding Instruments maps the main funding opportunities available to Blue Economy stakeholders, including national programmes, European Union funding instruments, international funding mechanisms, financial instruments, and private investment schemes. The analysis assesses their relevance, accessibility, and effectiveness in supporting Blue Economy development.

Section 4 – Target Group Mapping and Sector Analysis examines the main Blue Economy sectors and stakeholder groups in Bulgaria. The analysis covers both established sectors, such as fisheries and aquaculture, maritime transport, ports, shipbuilding and coastal tourism, and emerging sectors including marine renewable energy, marine biotechnology, ocean observation, marine ecosystem restoration, blue carbon initiatives, and circular economy activities related to the marine environment.

Section 5 – Stakeholder Consultation Results presents the findings from field research conducted through stakeholder surveys and consultations involving representatives of public authorities, academia, business organisations, industry actors, and civil society. The consultations provide qualitative evidence on governance challenges, investment needs, skills gaps, funding barriers, and opportunities for future development.

Section 6 – Potentials and Gaps (SWOT Analysis) synthesises the findings from the previous sections through a structured assessment of strengths, weaknesses, opportunities, and threats. This analysis identifies areas of comparative advantage, emerging growth opportunities, institutional and regulatory bottlenecks, funding gaps, and capacity-building needs.

Section 7 – Conclusions and Recommendations consolidates the key findings of the report and formulates recommendations for policy improvements, institutional strengthening, optimisation of funding mechanisms, stakeholder engagement, and enhanced cooperation at both national and Black Sea regional level.

The overall methodology combines evidence gathered through desk-based analysis and stakeholder consultation, enabling both a factual assessment of the existing Blue Economy framework and the identification of future development priorities and policy needs.

List of Abbreviations

Abbreviation	Full Term
BAS	Bulgarian Academy of Sciences
BASBA	Bulgarian Association of Ship Brokers and Agents
BE	Blue Economy
BPIC	Bulgarian Port Infrastructure Company
BCS	Bulgarian Chamber of Shipping
BSA	Bulgarian Shipowners Association
BSAC	Black Sea Advisory Council
BULNAS	Bulgarian National Association of Shipbuilding and Shiprepair
CBD	Convention on Biological Diversity
CEF	Connecting Europe Facility
CII	Carbon Intensity Indicator (IMO GHG rating scheme)
CMA	Coastal Management Authority
CLLD	Community-Led Local Development
DCF	Data Collection Framework
DG MARE	Directorate-General for Maritime Affairs and Fisheries (European Commission)
EAFA	Executive Agency for Fishery and Aquaculture
EAMA	Executive Agency for Maritime Administration
EEXI	Energy Efficiency Existing Ship Index (IMO)
EEZ	Exclusive Economic Zone
EIB	European Investment Bank
EIF	European Investment Fund
EIT	European Institute of Innovation and Technology
EMFAF	European Maritime, Fisheries and Aquaculture Fund
EMFF	European Maritime and Fisheries Fund (2014–2020)
ERDF	European Regional Development Fund
EU	European Union
EU ETS	EU Emissions Trading System
EUBO	European Blue Economy Observatory
FLAG	Fisheries Local Action Group
FMFIB	Fund Manager of Financial Instruments in Bulgaria
FuelEU	FuelEU Maritime Regulation (Regulation (EU) 2023/1805)
GBF	Global Biodiversity Framework (Kunming-Montreal, 2022)
GES	Good Environmental Status
GHG	Greenhouse Gas
GVA	Gross Value Added
IMO	International Maritime Organization
IO-BAS	Institute of Oceanology 'Fridtjof Nansen' — Bulgarian Academy of Sciences
ITLOS	International Tribunal for the Law of the Sea
EIT Water KIC	European Institute of Innovation and Technologies (EIT) Knowledge and Innovation Community (KIC) on Water, Marine Maritime sectors and ecosystems
MAF	Ministry of Agriculture and Food
MARPOL	International Convention for the Prevention of Pollution from Ships (1973/1978)
MCB	Marine Cluster Bulgaria
MEII	Ministry of Economy, Investments and Industry (Bulgaria)
MEPC	Marine Environment Protection Committee (IMO)

MOEW	Ministry of Environment and Water
MFF	Multiannual Financial Framework
MNSP	Multiannual National Strategic Plan for Aquaculture in Bulgaria (2021–2027)
MIDP	Municipal Integrated Development Plan
MRDPW	Ministry of Regional Development and Public Works
MSP	Maritime Spatial Planning
MSFD	Marine Strategy Framework Directive
MTC	Ministry of Transport and Communications
NCRSD (2026-2040)	National Concept for Regional and Spatial Development 2026–2040
NRRP	National Recovery and Resilience Plan
OP	Operational Programme
Paris MOU	Paris Memorandum of Understanding on Port State Control
PMAFA	Programme for Maritime Affairs, Fisheries and Aquaculture 2021–2027 (PMAFA 2021–2027)
RDP	Regional Development Programme
SBEP	Sustainable Blue Economy Partnership
SDG	Sustainable Development Goal (UN 2030 Agenda)
SOLAS	International Convention for the Safety of Life at Sea (1974, as amended)
SME	Small and Medium-sized Enterprise
STCW	International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (1978/2010)
TEN-T	Trans-European Transport Network
UACEG	University of Architecture, Civil Engineering and Geodesy
UBBSLA	Union of Bulgarian Black Sea Local Authorities
UNCLOS	United Nations Convention on the Law of the Sea
UNEP-FI	United Nations Environment Programme Finance Initiative
UNESCO	United Nations Educational, Scientific and Cultural Organization
WFD	Water Framework Directive

Section 1: Institutional Mapping

1.0 Introduction

The development of the Blue Economy (BE) in Bulgaria takes place within a complex institutional landscape shaped by European Union directives, national legislation, and a broad network of public, academic, private, and civil society actors. Bulgaria's coastal and marine space — encompassing approximately 378 km of Black Sea coastline and an Exclusive Economic Zone of roughly 35,000 km² and population of nearly 0.9 million people — provides the geographical and economic context within which these actors operate. The BE sectors of national relevance include maritime transport (shipping, shipbuilding and ship repair, ports and port operations), coastal and maritime tourism, fisheries and aquaculture, marine environmental protection, marine research, and emerging sectors such as marine renewable energy and maritime biotechnology.

This section maps the key institutional actors relevant to the Blue Economy in Bulgaria, organised across four categories: (1) National and Regional Authorities; (2) Research and Education; (3) Business Support Organisations in the blue economy sectors; and (4) Civil Society and NGOs. The mapping draws on the stakeholder database compiled under the BlueDial project, supplemented by publicly available institutional data and policy documents, including Bulgaria's Marine Strategy for the Black Sea, the Maritime Spatial Plan of the Republic of Bulgaria 2021–2035, the National Concept for Regional and Spatial Development 2026–2040, relevant EU maritime policy frameworks, etc.

The institutional analysis presented in this section establishes the evidence base for subsequent activities under Work Package 1 of the BlueDial project, supporting the identification of good practices (Activity 1.2), the assessment of capacity-building needs (Activity 1.3), and the development of the joint BlackBlueNET knowledge platform (Activity 1.4).

1.1 National and Regional Authorities

Governance of the Blue Economy in Bulgaria is distributed across multiple ministries and executive agencies, reflecting the cross-sectoral nature of maritime and coastal activities. Coordination at the national level is primarily ensured through the Council of Ministers, while sector-specific responsibilities are allocated as described below.

1.1.1 Ministry of Transport and Communications

The Ministry of Transport and Communications (MTC) is the lead national authority responsible for maritime transport policy, port governance, and maritime safety in Bulgaria. MTC is responsible for the transposition, implementation, and enforcement of key EU maritime legislation, including Directive 2009/16/EC on Port State Control, Directive 2002/59/EC establishing a Community vessel traffic monitoring and information system, and other relevant maritime legislation described in Annex I of this Report. The MTC also serves as Bulgaria's national coordinator for the Common Maritime Agenda for the Black Sea (CMA). The MTC exercises supervisory authority over the following subordinate bodies:

Executive Agency 'Maritime Administration' (EAMA) — the principal regulatory and inspection body for maritime safety, seafarer certification, vessel registration, and maritime accident investigation. EAMA operates regional offices in Varna and Burgas. In accordance with the Law on Maritime Spaces, Internal Waterways and Ports of the Republic of Bulgaria (LMSIWP) and numerous other secondary legislative acts listed in Annex I, EAMA is responsible for planning and organising maritime search and rescue (SAR) activities, coordinating cooperation with the SAR services and assets of neighbouring states, **in cooperation with the Ministry of Defence and the Ministry of Interior** — conducting search and rescue operations in the maritime areas of the Republic of Bulgaria and coordinate with the European Maritime Safety Agency (EMSA) on pollution response and vessel monitoring. EAMA is structured into a central office (Sofia) and four main directorates: Directorate "Maritime Administration - Varna", Directorate "Maritime Administration - Burgas", Directorate "River Supervision - Ruse" (region- Bulgarian section of the Danube River), General Directorate "Emergency and Rescue Activities" (including the Maritime Rescue Coordination Center).

- Bulgarian Port Infrastructure Company (BPIC) — the state enterprise responsible for the construction and maintenance of port infrastructure, navigational aids, and the regulation of port services at public transport ports. The head office is located in Sofia and has four territorial divisions located in Varna, Burgas (Black Sea coast), Ruse and Lom (Danube coast). It is responsible for ship traffic management in the Black Sea and on the Danube River, administers port concession agreements.
- The port authorities and BPIC collectively constitute the institutional framework for port governance in Bulgaria and are key stakeholders in green port initiatives, digitalisation of port operations, and multimodal connectivity investments under the Trans-European Transport Network (TEN-T).

1.1.2 Ministry of Agriculture and Food

The Ministry of Agriculture and Food (MAF) holds primary responsibility for fisheries policy, aquaculture development, and the management of EU structural funds under the European Maritime, Fisheries and Aquaculture Fund (EMFAF) 2021–2027. The national EMFAF operational programme — Programme for Maritime Affairs, Fisheries and Aquaculture 2021–2027 (PMAFA) — was approved by the European Commission on 23 November 2023 and is administered through the Directorate for Maritime Affairs and Fisheries (DMAF) within MAF. Key functions relevant to the Blue Economy include:

- Implementation of the Common Fisheries Policy (CFP) in Bulgarian waters of the Black Sea, including the setting of national quotas and the management of fishing effort.
- Administration of the national support programme for aquaculture, processing, and marketing of fisheries products.
- Coordination of data collection for stock assessment under the Data Collection Framework (DCF) in collaboration with the Institute of Fisheries and Aquaculture (IFA).

In implementation of Council Regulation (EU) No. 1060/2021, a PMAFA Monitoring Committee has been established and operates at the Ministry of Agriculture, which includes representatives of the Council of Ministers, the ministry, relevant NGOs, the academic community, etc. interest groups.

- The Executive Agency for Fisheries and Aquaculture (EAFA), subordinate to the MAF, is the operational authority for fisheries control, inspection, and the management of EMFAF payments to beneficiaries. It is structured into a general and specialized administration. The general administration is organized into the Directorate "Administrative and Legal Services and Human Resources" and the Directorate "Financial and Economic Activities and Property Management". The specialized administration ensures the implementation of the main functions of the agency and is organized into the General Directorate "Fisheries and Control" and the Directorate "Fisheries Management and Conservation of Fish Resources". The main office of the Agency is located in Burgas, the General Directorate "Fisheries and Control" has six departments, four of which are located on a territorial basis in Burgas, Ruse, Sofia, Plovdiv; the "Fisheries Monitoring Center" department, located in Varna and the "Structural Funds for Fisheries" department, located in Sofia.

1.1.3 Ministry of Environment and Water

The Ministry of Environment and Water (MOEW) develops and implements state policy in the field of environment, its main aspects being related to: legislative initiative – preparation of regulations; strategic planning – preparation of national plans and strategies; implementation of sectoral policies – water, waste, climate, air, nature, soils, noise, radiation; exercise of preventive activities – regulatory and control functions to prevent environmental pollution; management of programs and projects financed by European Union funds and other international financing organizations. It's responsible for the implementation of EU environmental legislation with direct marine relevance, most notably: **Marine Strategy Framework Directive** (MSFD, 2008/56/EC). Bulgaria adopted its Marine Strategy for the Black Sea, establishing environmental targets and a Monitoring Programme for achieving Good Environmental Status (GES) by 2020/202; **Water Framework Directive** (WFD, 2000/60/EC) — covering coastal and transitional waters within 1 nautical mile of the baseline; Habitats Directive (92/43/EEC) and **Birds Directive** (2009/147/EC) — governing the Natura 2000 network along the Black Sea coast, including marine Natura 2000 sites.

- Water management in the Republic of Bulgaria is carried out at national and basin level. Four basin management regions have been defined in Bulgaria - Danube, Black Sea, East Aegean and West Aegean, and four basin directorates (BDs) have been created respectively. In carrying out water management functions, the BDs develop, update and implement **River Basin Management Plans**, **Flood Risk Management Plans** and **Marine Strategy**. They manage mineral waters, plan and participate in monitoring under the Water Act, summarise and analyse data, determine the natural and available resources of groundwater bodies and establish sanitary protection zones.
- The Basin Directorate for Black Sea Region, (headquartered in Varna), covers the Bulgarian Black Sea waters - the coastal sea, the territorial sea and the exclusive economic zone, and all rivers that form their courses mainly on Bulgarian territory, which flow into the Black Sea directly or through coastal lakes and bays.
- The Regional Inspectorates of Environment and Water (RIEW) in Varna and Burgas carry out environmental monitoring and enforcement at the regional level. The control functions of the RIEW consist of implementing preventive, current and ex-post control over the implementation of regulatory acts regulating the quality of environmental components and the factors that affect it. The control activities are related to prevention of pollution or damage and restoration of the environment from pollution or damage, protection of waters from pollution, compliance with the requirements for ensuring environmentally sound waste management, protection of the elements of the National Ecological Network and biodiversity, protection of atmospheric air quality.
- MOEW serves as the National Contact Point for Bulgaria for the European Union Innovation Fund

1.1.4 Ministry of Regional Development and Public Works

The Ministry of Regional Development and Public Works (MRDPW) is the managing authority for **the Maritime Spatial Plan (MSP) of Bulgaria**, adopted pursuant to the EU Maritime Spatial Planning Directive (2014/89/EU). Bulgaria's Maritime Spatial Plan, covering the territorial sea and the EEZ, entered into force in 2023 and establishes spatial allocations for maritime transport, port infrastructure, fisheries, aquaculture zones, tourism, military use, and environmental protection areas.

The MRDPW also acts as the Managing Authority for the Regional Development Programme 2021-2027 and manages the INTERREG cross-border cooperation programmes (including the Black Sea Basin and the Danube Region), coordinating with the National Agency for Regional Development the implementation of the territorial cohesion objectives along the Black Sea coast.

The Ministry of Regional Development and Public Works (MRDPW) is Bulgaria's National Coordinator for the EU Strategy for the Danube Region (EUSDR).

1.1.5 Ministry of Tourism

The Ministry of Tourism holds policy responsibility for coastal and maritime tourism, a significant BE sector in Bulgaria. The Bulgarian Black Sea coast hosts the country's most developed coastal tourism resorts and historic destinations (Golden Sands, Sunny Beach, Sozopol, Nesebar etc). Key instruments include the National Tourism Strategy and the tourism-related components of regional development programmes financed through the European Regional Development Fund (ERDF). The Ministry also coordinates Bulgaria's participation in the European Tourism Quality Label and sustainable coastal tourism initiatives.

1.1.6 The Ministry of Culture

The Ministry of Culture is the competent national authority for cultural heritage policy, including **underwater cultural heritage** under the Law on Cultural Heritage (LCH). The LCH defines underwater cultural monuments as national heritage and mandates their identification, protection, and management. In practice, this responsibility is exercised through the Institute for Underwater Heritage (formerly Centre for Underwater Archaeology, Sozopol), a UNESCO Category 2 Centre operating under the Ministry of Culture, which has catalogued over 100 underwater archaeological sites in Bulgarian Black Sea waters, including ancient shipwrecks, amphora fields, and submerged ancient settlements (see §1.2.8). The Ministry of Culture is also responsible for the maritime cultural heritage dimension of coastal tourism — in particular, the integration of underwater heritage sites into dive tourism and maritime cultural routes. As a signatory to

the UNESCO Convention on the Protection of the Underwater Cultural Heritage (2001), Bulgaria has obligations that are administered through the Ministry of Culture.

- The UNESCO Underwater Heritage Institute (before Centre for Underwater Archaeology) is a state institute under the Ministry of Culture. Established in 1978 in Sozopol, it is the oldest such centre in Eastern Europe.

1.1.7 Ministry of Energy

The Ministry of Energy is responsible for energy policy, including the offshore renewable energy and hydrocarbon extraction dimensions of the Blue Economy. It is the lead authority for the Integrated National Energy and Climate Plan (INECP), which sets Bulgaria's binding renewable energy targets under Regulation (EU) 2018/1999. The INECP includes an indicative offshore wind energy component for the Black Sea, although specific offshore wind energy priority zones in Bulgarian waters have not yet been designated — an obligation required under the Law on Renewable Energy Sources (LRES) that remains unfulfilled as of 2026, constituting the primary regulatory gap for offshore wind development. The Ministry also oversees the licensing framework for offshore hydrocarbon exploration and extraction under the Law on Underground Resources, which implements UNCLOS Article 77 sovereign rights over the continental shelf and transposes the Offshore Safety Directive 2013/30/EU. The Ministry of Energy is a key inter-ministerial partner for the **maritime spatial planning process**, as both offshore energy and hydrocarbon concession zones require integration into the **Maritime Spatial Plan 2021–2035**

1.1.8 Ministry of Innovation and Digital Transformation

The Ministry of Innovation and Digital Transformation (MIDT) was established on 8 May 2026 through the merger of the former Ministry of Innovation and Growth and the Ministry of Electronic Governance. It manages the principal horizontal innovation and SME support instruments through which Bulgarian Blue Economy enterprises and research institutions can access ERDF co-financing outside the sector-specific EMFAF and energy programmes. It is the managing authority for the Programme for Competitiveness and Innovation in Enterprises (PCIE) 2021–2027, which funds R&D, digitalisation, green transition, and internationalisation of Bulgarian SMEs, and for the Programme for Research, Innovation and Digitisation for Smart Transformation (PRID) 2021–2027, which supports research infrastructure and innovation ecosystem development. Both programmes explicitly identify marine biotechnology, aquaculture innovation, and green and digital maritime technology as eligible sectors under Bulgaria's Research and Innovation Strategy for Smart Specialisation 2021–2027 (IS3 2021–2027). For BlueDial's target group of Blue Economy SMEs, start-ups, and research institutions, PCIE and PRID represent the two main horizontal pathways for accessing EU innovation funding that complements the sectoral instruments (EMFAF, ERDF coastal programmes). The Ministry also coordinates National scheme for projects that have received Seal Excellence (SoE) by European Innovation Council (EIC) under “Horizon 2020” and “Horizon Europe”.

1.1.9 Ministry of Defence

The Ministry of Defence (exercises command over the Bulgarian Naval Forces, headquartered in Varna with a principal base at the Port of Varna military zone. The Naval Forces contribute to maritime domain awareness through coastal surveillance, patrol operations in Bulgarian territorial waters and EEZ, and participation in NATO maritime operations in the Black Sea. The Navy's Hydrographic Service produces and maintains nautical charts for Bulgarian coastal and inland waters — a critical public good underpinning commercial navigation, marine scientific research, and maritime spatial planning. In the field of maritime safety and search-and-rescue coordination, the Naval Forces cooperate with the Executive Agency for Maritime Administration (IAMA) under the Ministry of Transport and Communications and with the Border Police of the Ministry of Interior. The Ministry of Defence also oversees the Nikola Vaptsarov Naval Academy (NVNA) in Varna (see §1.2.3), Bulgaria's only dedicated maritime higher education institution, which trains officers for both the naval forces and the civilian merchant fleet and provides programmes in navigation, marine engineering, and logistics.

1.1.10 Ministry of Interior

The Ministry of Interior performs coastguard and maritime security functions in Bulgarian waters through the Border Police (GDBP). Operating along the Black Sea coastline and at maritime border crossing points (Port of Varna, Port of Burgas, and coastal checkpoints), the Border Police conducts maritime patrol, controls vessel movements in territorial waters, supports search-and-rescue operations, and monitors illegal fishing activity in coordination with the Executive Agency for Fisheries and Aquaculture (EAFA). Bulgaria does not maintain a dedicated coastguard service separate from the Border Police; the GDBP therefore fulfils the coastguard role as defined in EU Regulation 2019/1896 on the European Border and Coast Guard (Frontex Regulation). In the context of the Blue Economy, the Ministry of Interior is relevant for maritime safety and security governance, the prevention of illegal, unreported, and unregulated (IUU) fishing.

1.1.11 The Ministry of Education and Science

The Ministry of Education and Science is responsible for national education policy, the accreditation of higher education programmes, and the national qualifications framework. In the Blue Economy context, its primary relevance is as the competent authority for accreditation of maritime, fisheries, marine science, and related higher education and vocational training programmes — including the degree programmes of the Nikola Vaptsarov Naval Academy, TU Varna etc. The Ministry manages the national qualification register and is the counterpart ministry for aligning the BlueComp Blue Skills Competence Framework (CINEA/EMFAF, 2025) with the Bulgarian National Qualifications Framework (HKP). It is also the national authority for the EMFAF Blue Careers initiative, through which EU funds support the development of blue economy curricula and student placements. The Ministry of Education and Science (MES) is responsible for national policy in the fields of education, science, and research. The Ministry is the Managing Authority of the Education Programme 2021–2027, with the Executive Agency “Programme Education” acting as an intermediate body responsible for programme management and implementation. The Agency also performs the managing authority functions for the Operational Programme “Science and Education for Smart Growth” 2014–2020. In addition, the Ministry supports and coordinates Bulgaria's participation in the EU Framework Programme for Research and Innovation Horizon Europe through the National Contact Point system and its representation in the programme's governance structures.

1.1.12 Ministry of Economy, Investments and Industry

The Ministry of Economy, Investments and Industry is the principal authority responsible for industrial policy, trade policy, and SME development in Bulgaria. In the Blue Economy context, its relevance spans three areas: (1) industrial policy for maritime manufacturing sectors, including shipbuilding, ship repair, and marine equipment manufacturing; (2) SME support measures implemented under the National Strategy for Small and Medium-Sized Enterprises, which provides the horizontal framework for enhancing enterprise competitiveness; and (3) investment promotion and investor support. While the Ministry oversees investment promotion policy and the Bulgarian Investment Agency, responsibilities in this area are shared with the Ministry of Innovation and Digital Transformation, which plays a key role in investment attraction, innovation policy, competitiveness funding, and business development. The Ministry is also responsible for the National Industrial Strategy for Manufacturing and Mining Industry Sectors 2025–2030, which provides the broader industrial policy framework relevant to maritime manufacturing activities.

1.1.13 Ministry of Foreign Affairs

The Ministry of Foreign Affairs represents Bulgaria within the Organization of the Black Sea Economic Cooperation (BSEC), the regional intergovernmental organisation established in 1992 and headquartered in Istanbul, bringing together all Black Sea countries. BSEC promotes economic cooperation across the wider Black Sea region in areas including transport, energy, trade, environmental protection, and the development of small and medium-sized enterprises — several of which intersect directly with Blue Economy priorities. The Ministry coordinates Bulgaria's participation in BSEC's working groups and ministerial meetings, providing a further diplomatic and intergovernmental channel, alongside the CMA and the Bucharest Convention, through which Bulgaria engages in regional Black Sea cooperation.

1.1.14 Regional and Local Authorities

At the regional level, the District Administrations of Varna and Burgas serve as the principal government representatives on the Black Sea coast, coordinating the implementation of national policies across the two coastal planning regions — the North-East Planning Region (centred on Varna) and the South-East Planning Region (centred on Burgas). Each region has an adopted Integrated Territorial Strategy for 2021–2027, both of which explicitly name the Blue Economy as a specific development objective.

In the context of the National Concept for Regional and Spatial Development 2026–2040 (NCRSD 2026–2040), the maritime coastal zone is defined through the 14 municipalities with direct access to the Black Sea, which form the core of the land–sea contact zone: Shabla, Kavarna, and Balchik (Dobrich province); Varna, Beloslav, Avren, Dolni Chiflik, and Byala (Varna province); and Nesebar, Pomorie, Burgas, Sozopol, Primorsko, and Tsarevo (Burgas province). This zone is the subject of dedicated analysis, management, and planning under the Maritime Spatial Plan of Bulgaria 2021–2035 and in alignment with EU and international frameworks for sustainable maritime governance.

At the municipal level, the two principal cities — Varna and Burgas — are the most institutionally developed actors in the local Blue Economy governance landscape.

The Municipality of Burgas is an important stakeholder in the development of the Blue Economy at local level and provides a notable example of the integration of Blue Economy objectives into municipal planning and governance. The municipality has adopted a **Strategy for Sustainable Blue Growth and Smart Specialisation of the Blue Economy 2024–2030**, which establishes a framework for supporting the sustainable development of maritime and coastal economic activities. The strategy is linked to the Municipality's Integrated Development Plan 2021–2027 through measures aimed at strengthening Blue Economy sectors and is accompanied by mechanisms for monitoring implementation and reporting on progress. Supporting this strategic approach, the municipal administration includes a dedicated Directorate for **Finance, Budget, Economy and Maritime Affairs**, reflecting the importance of maritime

As Bulgaria's largest coastal city and a major centre for maritime transport, tourism, fisheries, and marine services, the Municipality of Varna plays a significant role in the development of the Blue Economy. Unlike Burgas, which has adopted a dedicated **Strategy for Sustainable Blue Growth and Smart Specialisation of the Blue Economy 2024–2030**, Varna addresses Blue Economy-related priorities through its broader **Integrated Development Plan 2021–2027**. The Plan includes measures supporting sustainable urban and waterfront development, tourism, maritime transport infrastructure, and the modernisation of coastal and port-related facilities. Planned investments include the development of a Fisheries and Marine Sports Port and initiatives aimed at promoting more sustainable transport solutions. Tourism is also identified as a strategic priority within the municipality's planning and monitoring framework, reflecting its importance to the local economy and coastal development.

Bulgaria's Blue Economy institutional landscape also encompasses municipalities along the Danube River, which constitutes the northern border with Romania and forms part of the TEN-T Rhine–Danube Core Network Corridor. In accordance with the National Concept for Regional and Spatial Development 2026–2040 (NCRSD 2026–2040), the Danube coastal zone encompasses 24 municipalities with a direct border with the river: Bregovo, Novo Selo, Vidin, and Dimovo (Vidin province); Lom, Brusartsi, Yakimovo, and Valchedram (Montana province); Kozloduy, Hayredin, Oryahovo, and Miziya (Vratsa province); Gulyantsi, Nikopol, and Belene (Pleven province); Svishtov (Veliko Tarnovo province); Tsenovo, Borovo, Ivanovo, Ruse, and Slivo Pole (Ruse province); and Tutrakan, Sitovo, and Silistra (Silistra province). These municipalities are relevant to the Blue Economy through inland waterway transport and port operations, river fisheries (managed under the GFCM framework, which covers both the Black Sea and inland waters), river-based tourism, and the Danube–Black Sea ecological and hydrological continuum. Several of these — Vidin, Lom, Kozloduy, Oryahovo, Nikopol, Svishtov, Ruse, Tutrakan, and Silistra — operate public river ports administered by the Bulgarian Port Infrastructure Company (BPIC). The Danube dimension is also covered by the mandate of the Black Sea–Danube Association for Research and Development (BDCA), which addresses the Lower Danube and Black Sea coastal zone as an integrated research area.

1.2 Research and Education

Bulgaria has a well-established base of marine research institutions, primarily concentrated in Varna — the country's principal maritime city and the location of the main Black Sea research infrastructure. Marine science in Bulgaria covers physical oceanography, marine biology and ecology, fisheries science, maritime engineering, and marine environmental monitoring. The following institutions are the principal contributors to marine science and technology knowledge production relevant to the Blue Economy.

1.2.1 Institute of Oceanology — IO-BAS

The Institute of Oceanology "Fridtjof Nansen" (IO-BAS), based in Varna and operating under the Bulgarian Academy of Sciences (BAS), is Bulgaria's leading marine research institution. Its activities cover physical oceanography, marine geology, marine biology and ecology, marine chemistry, and remote sensing of the Black Sea. IO-BAS provides scientific support for the implementation of Bulgaria's Marine Strategy and contributes to marine environmental monitoring under the Marine Strategy Framework Directive (MSFD). The Institute contributes data and expertise to European marine observation and monitoring initiatives, including EMODnet and the Copernicus Marine Environment Monitoring Service (CMEMS), and participates in a number of European research projects, including DOORS and BRIDGE-BS. As a founding member of Marine Cluster Bulgaria and Bulgaria's principal partner in the Euro-Argo ERIC research infrastructure, IO-BAS plays an important role in marine observation, knowledge generation, and evidence-based decision-making. Its research supports maritime spatial planning, marine environmental assessment, coastal and offshore development, and the sustainable management of marine resources.

1.2.2 Bulgarian Ship Hydrodynamics Centre (BSHC)

The Bulgarian Ship Hydrodynamics Centre (BSHC), based in Varna, is a research institute of the Bulgarian Academy of Sciences specialising in ship hydrodynamics, naval architecture, and offshore engineering. The Centre conducts experimental and computational research in areas such as ship resistance and propulsion, seakeeping, manoeuvring, marine noise and vibration, and underwater acoustics, supported by dedicated ship model testing facilities. It provides scientific and technical services to shipbuilding and ship repair companies, port operators, and offshore engineering projects, and contributes to the development of innovative and environmentally sustainable maritime technologies. Through its research and cooperation activities, BSHC contributes expertise relevant to maritime transport, shipbuilding, coastal engineering, and the broader development of the Blue Economy.

1.2.3 Institute of Biodiversity and Ecosystem Research (IBER-BAS)

The Institute of Biodiversity and Ecosystem Research (IBER-BAS, Sofia) conducts marine ecology and coastal habitat assessments, including Natura 2000 scientific support for Black Sea marine protected areas.

1.2.4 National Institute of Meteorology and Hydrology (NIMH-BAS)

The National Institute of Meteorology and Hydrology (NIMH-BAS) is responsible for marine meteorology, Black Sea hydrological modelling, and WMO maritime weather forecasting for the Western Black Sea.

1.2.5 Institute of Geophysics, Geodesy and Geography (IGGG-BAS)

The Institute of Geophysics, Geodesy and Geography (IGGG-BAS, Sofia) undertakes marine geology, seabed mapping, and coastal erosion research.

1.2.6 Institute of Fisheries and Aquaculture (IFA)

The Institute of Fisheries and Aquaculture (IFA), located in Varna, is the national centre for fisheries research and aquaculture science, operating as an executive agency under the Ministry of Agriculture and Food. IFA carries out biological sampling and stock assessment under the EU Data Collection Framework (DCF), provides scientific advice for fisheries management in Bulgarian Black Sea waters, and conducts applied research on aquaculture production systems. It is Bulgaria's focal point for participation in the General Fisheries Commission for the Mediterranean (GFCM) and coordinates with the Scientific, Technical and Economic Committee for Fisheries (STECF).

1.2.7 Institute for Underwater Heritage (UNESCO Category 2 Institute)

Based in Sozopol, the Institute for Underwater Heritage was formally designated as a UNESCO Category 2 Institute on 19 January 2026, when the agreement between UNESCO and the Republic of Bulgaria was signed. Formerly operating as the Centre for Underwater Archaeology (CUA), it is responsible for the identification, study, and protection of subaquatic cultural heritage, the registry of underwater cultural assets, and coordination with the Maritime Spatial Plan with respect to subaquatic heritage zones. The formal institutional name change is pending completion of national ratification procedures.

1.2.8 Nikola Vaptsarov Naval Academy (NVNA)

The Nikola Vaptsarov Naval Academy (NVNA), located in Varna, is Bulgaria's dedicated maritime higher education institution for naval officer training and maritime management. It offers undergraduate and postgraduate programmes in navigation, marine engineering, maritime law, and port and logistics management. NVNA is a full member of the International Association of Maritime Universities (IAMU) and maintains research partnerships with naval academies across the Black Sea region.

1.2.9 Technical University of Varna (TU-Varna)

The Technical University of Varna (TU-Varna) is one of Bulgaria's leading higher education institutions for maritime engineering, naval architecture, and marine technology. Its faculties cover naval architecture, ship repair technology, port logistics, and mechanical and electrical engineering relevant to offshore systems. TU-Varna holds IMO Model Course accreditation for seafarer training and is a member of Marine Cluster Bulgaria. It is an active partner in Erasmus+ and maritime skills development initiatives at the European level.

1.2.10 University of Economics — Varna (UE-Varna) and College of Tourism

The University of Economics — Varna (UE-Varna) contributes to Blue Economy research through faculty activities in maritime business management, port economics, tourism economics, and international trade. The College of Tourism — Varna (CT-Varna), a structural unit of UE-Varna founded in 1963 as Bulgaria's oldest tourism higher education institution, is the most directly relevant academic unit for coastal and maritime tourism. CT-Varna maintains active research on smart tourism destinations and sustainable coastal tourism.

1.2.11 University of Architecture, Civil Engineering and Geodesy (UACEG)

The University of Architecture, Civil Engineering and Geodesy (UACEG), based in Sofia, contributes to the Blue Economy through research in coastal and hydraulic engineering, port and marine infrastructure design, and GIS and spatial data management for marine planning. UACEG cooperates with BDCA and the Bulgarian Ship Hydrodynamics Centre (BAS) on coastal zone modelling, and its expertise informs the technical components of the Maritime Spatial Plan 2021–2035.

1.2.12 Trakia University – Stara Zagora

Trakia University (Stara Zagora) has strong expertise in aquaculture and fisheries, including fish breeding, aquatic animal health, and sustainable aquaculture systems.

1.2.13 Technical University of Sofia

Technical University of Sofia contributes expertise in electronics, automation, robotics, and energy systems relevant to emerging Blue Economy applications.

1.2.14 Varna Free University ‘Chernorizets Hrabar’

Varna Free University ‘Chernorizets Hrabar’ is the largest private university in Bulgaria. The university participates in international and regional cooperation initiatives in the Black Sea region and contributes expertise in areas such as law, public administration, architecture, regional development, sustainable development, and the circular economy.

1.2.15 Burgas Free University (BFU)

Burgas Free University (BFU) plays an active role in advancing the sustainable Blue Economy in the Black Sea region through participation in European research and innovation networks, including the Sustainable Blue Economy Partnership (SBEP), and through contributions to the implementation of the EU Mission 'Restore our Ocean and Waters'. Its activities focus on capacity building, innovation ecosystem development, stakeholder engagement, and support for knowledge transfer and entrepreneurship in Blue Economy sectors.

1.2.16 Prof. Dr. Assen Zlatarov University (Burgas)

Prof. Dr. Assen Zlatarov University (Burgas) has a strong research profile in chemical and environmental engineering, biotechnology, food technologies, and marine environmental protection, and participates in regional and European projects supporting sustainable Blue Economy development. Together with BFU, it is one of the two universities based in Burgas contributing to Blue Economy-related research and education in the region.

1.2.17 Vocational School of Maritime Navigation and Fishing 'Sveti Nikola' (Burgas)

The Vocational School of Maritime Navigation and Fishing 'Sveti Nikola' (Burgas), with over six decades of operation, trains students in maritime navigation and ship machinery and mechanisms specialisations and operates a Maritime Qualification Centre running courses approved by the Executive Agency 'Maritime Administration'.

1.2.18 Sveti Nikolay Chudotvorets Varna Maritime High School

The Sveti Nikolay Chudotvorets Varna Maritime High School (Varna) is a STEM-oriented vocational secondary school preparing students for maritime careers.

1.2.19 Vocational School of River Shipbuilding and Navigation (Ruse)

On the Danube, the Vocational School of River Shipbuilding and Navigation (Ruse), established in 1962, trains students in ship electrical equipment, ship machines and mechanisms, river navigation, and shipbuilding, providing the technical workforce pipeline for Bulgaria's river shipbuilding and navigation sector.

1.2.20 Bulgarian Maritime Training Centre (BMTc)

The Bulgarian Maritime Training Centre (BMTc), based in Varna, is a specialised VET provider delivering professional qualification and certification training for seafarers and maritime professionals. Established in 1974 and designated a national maritime training centre by the Ministry of Transport in 1989, BMTc operates STCW-compliant training using Bridge, Engine Room, and Liquid Cargo Handling simulators, delivering over 40 training courses. Independent since 2000, it provides training services to the wider international shipping community and constitutes a key blue-skills training infrastructure asset for Bulgaria's maritime workforce.

1.2.21 Medical University of Varna (MU-Varna)

The Medical University of Varna (MU-Varna) opened a new teaching and research complex in May 2026. The complex includes Bulgaria's first dedicated marine medicine laboratory, providing a controlled environment and specialised equipment for anthropometric, functional, and psychophysiological research on people working at sea, with the aim of improving the safety and health of maritime professionals. A second laboratory, for nutritional status assessment, is equipped for precise body composition analysis. MU-Varna research capacity complements Bulgaria's marine science and technology base into the field of occupational health and human performance research for the maritime workforce.

1.3 Blue Economy Stakeholder Organisations

1.3.1 Marine Cluster Bulgaria (MCB)

Marine Cluster Bulgaria (MCB) is a non-governmental organisation that brings together businesses, research and educational institutions, public authorities, and business support organisations active in the Blue Economy. The Cluster promotes cooperation among stakeholders and supports knowledge exchange, innovation, internationalisation, and capacity building across a range of maritime sectors.

MCB acts as the Bulgarian National Hub of the Common Maritime Agenda for the Black Sea (CMA) Assistance Mechanism, supporting stakeholder engagement and contributing to the implementation of regional maritime priorities. Through its membership in the European Network of Maritime Clusters (ENMC), MCB facilitates links between Bulgarian stakeholders and European maritime networks and initiatives.

Since 2022, MCB hosts the Enterprise Europe Network (EEN) in Bulgaria, providing advisory services to SMEs in the areas of innovation, internationalisation, sustainability, and access to European partnerships and funding opportunities. MCB hosts the Black Sea Regional Hub of EIT Water, contributing to the development of innovation ecosystems, skills, entrepreneurship, and cooperation in the water and Blue Economy sectors.

Through its national and international activities, MCB contributes to stakeholder engagement, policy dialogue, project development, and the promotion of sustainable Blue Economy development in Bulgaria and the wider Black Sea region.

1.3.2 Maritime Transport (Shipping, Shipbuilding/Ship Repair, Ports, and Supporting Services)

The following sector associations represent the maritime transport and shipping sub-sectors — shipping, shipbuilding and repair, ship brokerage, ship supply, port operations, seafarer welfare, search and rescue, and towage.

- **The Bulgarian Chamber of Shipping (BCS)**, established in 1993 and headquartered in Varna, is a voluntary non-profit association representing a broad range of stakeholders from Bulgaria's maritime sector. Its mission is to protect and promote the interests of its members, support the development of national and international maritime economic cooperation, and strengthen the participation of Bulgarian maritime businesses in international maritime activities. BCS represents its members in international non-governmental organisations and, where authorised by the competent state authorities, in intergovernmental organisations.
- **The Bulgarian National Association of Shipbuilding and Shiprepair (BULNAS)** is the principal industry association representing Bulgaria's shipbuilding, ship repair, marine equipment manufacturing, and related maritime industrial sectors. Its member companies employ approximately 4,300 staff and engage a substantial network of subcontractors. BULNAS promotes the competitiveness and development of the Bulgarian maritime industry, supports cooperation among industry stakeholders, and represents the interests of its members at national and European level. The association is a member of SEA Europe, through which it contributes to discussions on the development and competitiveness of the European shipbuilding and maritime technology sectors.
- **The Bulgarian Shipowners Association (BSA)** represents private shipowners with a combined fleet exceeding 1 million DWT across its 13 members. BSA is a full member of KRIB (Confederation of Employers and Industrialists in Bulgaria) and participates in tripartite social dialogue. It cooperates closely with BCS, BASBA, and other maritime bodies on maritime decarbonisation, port accessibility, and seafarer welfare policy.
- **The Bulgarian Association of Ship Brokers and Agents (BASBA)** is the national representative organisation of ship brokers and ship agents in Bulgaria. Its members operate across the country's maritime and river ports, providing ship agency and brokerage services and representing major international liner operators. BASBA members serve approximately 70% of vessels calling at the ports of the Varna region and maintain a significant presence in Burgas and the Danube ports. The

association is a full member of the Federation of National Associations of Ship Brokers and Agents (FONASBA) and the European Community Association of Ship Brokers and Agents (ECASBA), and is a member of both the Bulgarian Chamber of Shipping and Marine Cluster Bulgaria.

- **The Bulgarian Association of Ship Suppliers (BSSA)** represents 13 ship supply companies operating in Bulgarian ports; it is a member of ISSA (International Ship Suppliers and Services Association) and OCEAN (European Ship Suppliers Association).
- **The Association of Bulgarian Private Ports (ABPP)** represents private port operators and concessionaries.
- **The Bulgarian Shipmasters Association (BSMA)** is a professional body for ship masters and deck officers, promoting seafarer welfare and maritime safety.
- **The Bulgarian Association for Search and Rescue at Sea (BULSAR)** is a voluntary, non-profit association for the coordination, search, and rescue of distressed people and disaster survivors within the Bulgarian maritime area of responsibility; its members are maritime specialists with search-and-rescue expertise and owners of small vessels used to carry out these activities.
- **The Bulgarian Association of Tug Owners (BATO)** unites all towage companies operating in Bulgarian sea ports, with the aims of developing the towage sector, improving safety in Bulgarian ports, and raising standards related to towage activities; BATO is an affiliated member of the European Tugowners Association (ETA) and cooperates with the competent national authorities, relevant EU institutions, and other international organisations.

1.3.3 Fisheries and Aquaculture

The following bodies represent fisheries and aquaculture stakeholders and deliver EU- and national-level fisheries governance functions, ranging from inter-branch representation to EU advisory participation and EMFAF-funded community-led local development.

- **BG FISH — Association of Fish Product Producers** is the main fisheries sector inter-branch organisation in Bulgaria, recognised under EU Regulation 1379/2013, with representative functions across all fisheries sub-sectors — commercial fishing, aquaculture, and fish processing. It is a member of the Black Sea Advisory Council (BISAC) and its Executive Committee, and participates in EU-level fisheries policy dialogue through DG MARE.
- **The Black Sea Sunrise Association** is a branch association of professionals in the field of sea fishing in the Black Sea. The association unites more than 35 companies that operate 46 fishing vessels with a length of over 12 metres. The main species subject to fishing are mullet, turbot, rapan, shark, bream, horse mackerel, and lefer. The main goal of the Black Sea Sunrise Association is to protect the rights and interests of its members, to stabilise the Black Sea fish market through collective planning and management of fishing activities and measures to bring catches into line with market requirements, and to assist in directing the supply and marketing of its members' products.
- **Fisheries Local Action Groups (FLAGS)** are among the most important local stakeholders supporting the development of coastal and fisheries-dependent communities in Bulgaria. Established under the European Maritime, Fisheries and Aquaculture Fund (EMFAF) through the Community-Led Local Development (CLLD) approach, they bring together representatives of the fisheries sector, local businesses, municipalities, civil society organisations, and other community actors to design and implement local development strategies. Along the Bulgarian Black Sea coast, seven FLAGS operate in the municipalities of Shabla, Kavarna, Balchik, Varna, Beloslav, Aksakovo, Pomorie, Burgas, Kameno, Sozopol, Primorsko, Tsarevo, and Malko Tarnovo. Through their bottom-up governance model, FLAGS play a key role in stakeholder engagement, local partnership building, and the implementation of initiatives supporting fisheries, aquaculture, coastal tourism, environmental sustainability, and the diversification of coastal economies. As locally embedded multi-stakeholder structures, they represent an important channel for community participation and dialogue in the development of the Blue Economy.
- **The Black Sea Advisory Council (BISAC)** is a non-profit legal entity for public benefit, established on 20 July 2015 pursuant to the provisions of the Law on Non-Profit Legal Entities of Bulgaria. BISAC is established with the objectives and principles of the Common Fisheries Policy (CFP) set out in

Regulation (EU) No. 1380/2013. Its mission is to promote a balanced representation of all fisheries and aquaculture stakeholders and to contribute to the achievement of the objectives of the CFP in the Black Sea. BISAC consists of a General Assembly and an Executive Committee. Bulgarian fisheries and aquaculture stakeholders — including BG FISH and the European Association of Fishermen in the Black Sea (EAFBS) — participate in the BISAC Executive Committee, providing the formal channel through which the Bulgarian sector contributes to EU-level fisheries governance for the Black Sea.

- **The European Association of Fishermen in the Black Sea (EAFBS)** is a cross-border small-scale fishers association covering Bulgaria and Romania, registered in 2016 with 103 members, which participates in BISAC working groups on small-scale fishing and working conditions.

1.3.4 Coastal and Maritime Tourism

The following organisations represent the coastal and maritime tourism sector, including recreational boating and destination-level tourism promotion.

- **The Bulgarian Yachting Association (BYA)** is an organisation dedicated to the development and promotion of the yachting industry in Bulgaria and the Black Sea region. BYA works to position Bulgaria as a preferred yachting destination, while enhancing safety, sustainability, and professional standards across the sector. The association represents the interests of yacht owners, captains, crews, brokers, operators, training institutions, and other stakeholders. BYA focuses on industry advocacy, supporting professional development and crew training, promoting community engagement, and advancing the sustainable blue economy. The association works to improve regulations and standards, stimulate investment, develop modern infrastructure, and raise international recognition of the Bulgarian yachting sector. The organisation also aims to support career growth and professional training for maritime specialists and crews, and to create platforms for knowledge sharing and collaboration among industry participants.
- **The Varna Chamber of Tourism (VCT)**, established in 1991 as the successor of the Territorial Association for Tourism and Recreation, is a voluntary association based in Varna uniting branch organisations and companies active in tourism — hotels, restaurants, tour operators and travel agencies, and related financial, insurance, manufacturing, transport, and commercial enterprises with an interest in tourism, as well as educational institutions training staff for the sector. VCT represents and protects the interests of its members before Bulgarian and foreign bodies and organisations, supports the conditions for sustainable tourism development, including eco-tourism, and organises the Black Sea Tourism Forum.

1.3.5 Ecology

The following non-governmental organisations focus on marine and coastal environmental conservation, biodiversity, and ecosystem protection in the Black Sea.

- **WWF Bulgaria** is one of the leading environmental non-governmental organisations active in Bulgaria, with a strong focus on biodiversity conservation, freshwater and marine ecosystems, climate adaptation, and sustainable natural resource management. In the Black Sea region, WWF Bulgaria contributes to initiatives related to sustainable fisheries, marine biodiversity conservation, ecosystem restoration, and the promotion of sustainable Blue Economy practices. Through research, advocacy, stakeholder engagement, and participation in national and regional policy discussions, the organisation supports the integration of environmental sustainability considerations into the management and development of coastal and marine sectors.
- **Greenpeace Bulgaria** is an environmental non-governmental organisation active in marine conservation, biodiversity protection, marine protected areas, and the reduction of marine pollution, including plastic waste. The organisation participates in public consultations and advocacy processes related to marine and environmental governance and contributes to policy discussions concerning the protection and sustainable management of marine ecosystems. Through its campaigns and stakeholder engagement activities, Greenpeace Bulgaria represents the interests of civil society within Bulgaria's marine and coastal policy framework.

- **The Via Pontica Foundation** is a non-governmental organisation based in Burgas that works to promote the conservation of biodiversity and the sustainable development of coastal and marine areas in the Black Sea region. Through research, environmental education, public awareness campaigns, and cooperation with public authorities, research organisations, local communities, and civil society actors, the Foundation contributes to the protection and sustainable management of wetlands, coastal ecosystems, and natural resources. Its activities address a range of environmental and sustainability challenges, including biodiversity conservation, ecosystem restoration, climate resilience, marine pollution, and the promotion of nature-based solutions.

1.3.6 Other Civil Society Organisations

The following civil society organisations encompass research-oriented non-profits and municipal association networks with Blue Economy relevance.

- **The Black Sea NGO Network (BSNN)**, headquartered in Varna, is a regional association of environmental and civil society organisations from the Black Sea countries that promotes environmental protection, sustainable development, and cross-border cooperation in the region. BSNN is actively engaged in regional initiatives addressing marine and coastal management, biodiversity conservation, environmental protection, and sustainable development, while also serving as a platform for knowledge exchange and cooperation across the Black Sea region. The Network holds observer status at the Commission on the Protection of the Black Sea against Pollution (Bucharest Convention), contributing to civil society participation in regional environmental governance and policy dialogue.
- **The Centre for Coastal and Marine Studies (CCMS)** is a Bulgarian non-governmental research organisation dedicated to advancing knowledge and evidence-based decision-making for the sustainable management of coastal and marine environments. The Centre conducts interdisciplinary research and provides expertise in areas such as coastal processes, maritime spatial planning, marine and coastal governance, environmental protection, and sustainable Blue Economy development. Through its work, CCMS supports the integration of scientific knowledge into policy and planning processes, contributing to improved management of marine resources and coastal zones.
- **The Black Sea–Danube Association for Research and Development (BDCA)**, based in Varna, is an independent non-profit research organisation grouping research institutions, consultancy firms, SMEs, and individual experts. It operates in the fields of sustainable use of water resources, coastal infrastructure protection, climate change adaptation, and environmental protection in the Black Sea coastal zone and Lower Danube. BDCA specialises in GIS solutions, numerical models, and simulation software for forecasting hydrodynamic and sediment transport processes in the coastal zone, rivers, and inland water bodies. It works in close cooperation with the Institute of Fish Resources (IFR Varna), the Bulgarian Ship Hydrodynamics Centre (BAS), and UACEG Sofia.
- **The Union of Bulgarian Black Sea Local Authorities (UBBSLA)** is a voluntary non-profit association of municipalities across the provinces of Burgas, Varna, and Dobrich, founded in 1992. Its core activities cover technical assistance and good practice dissemination to member municipalities, professional training through its Centre for Education and Training (est. 2003), organisation of conferences and seminars at regional and international level, and full project cycle management. It maintains twinning and cooperation links with municipalities in North Macedonia, Türkiye, Greece, and Hungary, and is relevant to coastal zone management, maritime spatial planning, and EU-funded cross-border programmes in the Black Sea region.

1.4 Summary and Key Observations

The institutional mapping demonstrates that Bulgaria's Blue Economy is supported by a broad range of public, academic, business, and civil society actors operating across national, regional, and local levels. Responsibilities relevant to the Blue Economy are distributed among multiple ministries and executive agencies covering maritime transport, fisheries and aquaculture, environmental protection, tourism, regional development, energy, innovation, education, and other related policy areas.

The mapping also highlights the diversity of Bulgaria's research, education, and training landscape. Marine and maritime-related expertise is provided by research institutes of the Bulgarian Academy of Sciences, specialised fisheries and marine research organisations, higher education institutions, and vocational education and training providers. Together, these organisations contribute to research, knowledge generation, skills development, and professional training relevant to Blue Economy sectors.

In addition to public institutions and research organisations, the Blue Economy ecosystem includes a wide range of stakeholder organisations, such as sectoral associations, clusters, local action groups, business support organisations, civil society organisations, and municipal networks. These actors represent the interests of businesses, coastal communities, research organisations, environmental stakeholders, and other groups involved in maritime and coastal activities.

Overall, the mapping illustrates the multi-sectoral and multi-stakeholder nature of the Blue Economy in Bulgaria and provides an overview of the institutional, research, educational, business, and civil society actors that contribute to its development. The findings presented in this section serve as the basis for the subsequent analysis of the legal and strategic framework, funding instruments, stakeholder perspectives, and development opportunities addressed in the following sections of the report.

Section 2: Legal and Strategic Framework

Introduction to Section 2

Section 2 maps the legal and strategic framework governing the Blue Economy in Bulgaria across three levels: European Union directives and strategies; national legislation and planning instruments; and regional and local strategies. The section concludes with a cross-level alignment and coherence assessment, evaluating the degree to which EU, national, and sub-national frameworks reinforce each other in advancing Blue Economy development.

The analysis draws on the Maritime Spatial Plan of the Republic of Bulgaria 2021–2035 (MSP), the Marine Strategy of the Republic of Bulgaria 2022–2027, the Integrated Territorial Strategies (ITS) for the South-East and North-East Planning Regions, municipal Integrated Development Plans (MIDP) for all 14 Black Sea coastal municipalities, and the relevant body of EU legislation.

A three-tier relevance framework is applied throughout: Tier 1 — documents explicitly labelled as Blue Economy strategies; Tier 2 — documents with explicit Blue Economy mentions or dimensions; and Tier 3 — documents governing Blue Economy sectors without using the label. This distinction matters because the 'Blue Economy' framing is unevenly distributed across Bulgaria's planning landscape, and conflating Tier 1 with Tier 3 instruments would overstate the degree of strategic integration.

2.1 Global and International Governance Framework

The governance of the Blue Economy operates within a multi-layered hierarchy of international, regional, EU and national legal instruments and policy frameworks. At the apex of this hierarchy are three foundational global frameworks: the United Nations Convention on the Law of the Sea (UNCLOS), the International Maritime Organization (IMO) convention system, and the United Nations Sustainable Development Goals (SDGs). These instruments define the legal basis for maritime jurisdiction, prescribe binding safety and environmental standards for shipping, and establish the overarching sustainability obligations that cascade through EU legislation to national and regional policy levels. International consensus is further articulated through a growing body of non-binding declarations, finance principles and biodiversity commitments that increasingly inform EU legislative instruments and national strategies. For Bulgaria, as a Black Sea coastal Member State of the European Union, these global frameworks constitute the external governance environment within which national Blue Economy policy is shaped. The global ocean economy was valued at approximately USD 1.5 trillion annually in 2010, supporting an estimated 30 million direct full-time equivalent jobs; OECD projections indicate this figure could reach USD 3 trillion and 40 million jobs by 2030, underscoring the strategic importance of sound international governance for sustainable ocean-based development (OECD, 2024).

2.1.1 United Nations Convention on the Law of the Sea (UNCLOS) and Maritime Jurisdiction

The United Nations Convention on the Law of the Sea (UNCLOS), opened for signature on 10 December 1982 at Montego Bay, Jamaica, and in force from 16 November 1994, constitutes the overarching international legal framework for all activities conducted in, on or under the ocean. Widely characterised as the 'constitution for the oceans', UNCLOS establishes a comprehensive system of maritime zones — the territorial sea (12 nautical miles), the contiguous zone (24 nautical miles), the Exclusive Economic Zone (EEZ, 200 nautical miles), the continental shelf and the high seas — each conferring distinct rights and obligations on coastal and flag states. These jurisdictional zones form the legal foundation for core Blue Economy activities, including fisheries, offshore energy development, seabed resource extraction, maritime transport and marine scientific research. UNCLOS Part XII establishes general obligations for states to protect and preserve the marine environment; Part XIII governs marine scientific research; and Part XV

provides compulsory dispute settlement procedures, including through the International Tribunal for the Law of the Sea (ITLOS) (United Nations, 1994).

As a State Party to UNCLOS and a coastal state bordering the Black Sea, Bulgaria exercises maritime jurisdiction within the context of a semi-enclosed sea as defined under UNCLOS Article 122. The limited geographic extent of the Black Sea means that the full 200-nautical-mile EEZ entitlement cannot be realised, and maritime boundary delimitations are governed by bilateral agreements with neighbouring coastal states applying the equidistance and relevant circumstances principles established under UNCLOS and international jurisprudence. Within its EEZ and continental shelf, Bulgaria holds sovereign rights over the exploration and exploitation of natural resources, including fisheries and offshore hydrocarbons, as well as jurisdiction over marine scientific research and the protection of the marine environment. As a flag state, Bulgaria is responsible under UNCLOS for ensuring that vessels flying its national flag comply with applicable international rules, including IMO conventions on safety and pollution prevention. These obligations are administered domestically by the Executive Agency Maritime Administration.

2.1.2 International Maritime Organization (IMO)

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2.1.3 UN Sustainable Development Goals, Biodiversity Framework, and International Blue Economy Declarations

The United Nations 2030 Agenda for Sustainable Development, adopted by the UN General Assembly in September 2015 (Resolution A/RES/70/1), establishes 17 Sustainable Development Goals (SDGs) with 169 associated targets. SDG 14 — Life Below Water — is the primary SDG addressing ocean governance and the Blue Economy, encompassing targets on the reduction of marine pollution (14.1), the protection and restoration of marine and coastal ecosystems (14.2 and 14.5), ocean acidification (14.3), sustainable fisheries management and the elimination of harmful fisheries subsidies (14.4 and 14.6), the strengthening of economic benefits for small island developing states (14.7), and the implementation of UNCLOS as the legal framework for ocean governance (14.c). SDG 13 (Climate Action) is closely related, as ocean warming, acidification and sea-level rise have direct implications for Blue Economy activities along Bulgaria's Black Sea coast. The SDG framework provides the normative reference for EU ocean policy and

is reflected in instruments including the Marine Strategy Framework Directive (MSFD), the EU Biodiversity Strategy 2030 and the European Green Deal (United Nations, 2015).

The Kunming-Montreal Global Biodiversity Framework (GBF), adopted at the fifteenth meeting of the Conference of the Parties to the Convention on Biological Diversity (CBD COP15, Montreal, December 2022), establishes a landmark international commitment to halt and reverse biodiversity loss by 2030 with a long-term vision of living in harmony with nature by 2050. Target 3 of the GBF — commonly referred to as the '30x30 target' — commits Parties to protect and conserve at least 30% of global land areas and at least 30% of global ocean and coastal areas through effective and equitable systems of protected areas by 2030. For Bulgaria, this commitment is operationalised primarily through the EU Biodiversity Strategy 2030 and the Natura 2000 network, which includes designated marine protected areas in the Bulgarian Black Sea. As a Party to the CBD, Bulgaria reports on its biodiversity commitments through national biodiversity targets aligned with the GBF (United Nations, 2022).

International consensus on sustainable Blue Economy governance is further shaped by a set of non-binding but increasingly influential declarations and finance principles. The UNEP-FI Sustainable Blue Economy Finance Principles (2018), developed by the United Nations Environment Programme Finance Initiative, set out 14 principles to guide responsible investment across ocean sectors, including shipping, fisheries, coastal and marine tourism, aquaculture and port infrastructure. The G20 High-Level Principles on Sustainable and Resilient Blue/Ocean-based Economy, adopted under the Indian G20 Presidency in Chennai in 2023, addressed the interconnected challenges of marine plastic pollution, ocean biodiversity loss and the climate impacts on and from the ocean. The COP28 Dubai Ocean Declaration (2023) explicitly recognised the ocean as a fundamental part of the global climate system, called for the integration of ocean considerations into national climate plans under the Paris Agreement and underscored the role of coastal and ocean-based nature-based solutions in climate mitigation and adaptation. Taken together, these declarations reflect the consolidation of an international Blue Economy governance architecture that complements the binding treaty framework and increasingly informs EU and national policy design (OECD, 2024).

2.2 EU-Level Framework

2.2.1 EU Strategic Approach to the Black Sea

The EU Black Sea Synergy, launched by European Commission Communication COM (2007) 160 final of 11 April 2007, constitutes the foundational EU strategic framework for regional cooperation in the Black Sea area. Adopted in the context of EU enlargement following the accession of Bulgaria and Romania, the Black Sea Synergy established the EU's commitment to structured engagement with all Black Sea littoral states — including non-EU partners Georgia, Turkey, Ukraine, Moldova, Armenia, and Azerbaijan — across seven cooperation pillars: democracy and good governance; energy security; environment; transport; fisheries management; social affairs; and education, research and technology. Its marine environment and fisheries dimensions laid the political and institutional groundwork for the subsequent development of the Black Sea Blue Economy governance architecture. The Black Sea Synergy remains the overarching reference framework for EU regional engagement in the Black Sea area and provides the political foundation within which the Common Maritime Agenda (CMA), the Bucharest Convention, and all sector-specific EU maritime instruments operate in their respective domains.

The Joint Communication 'The European Union's Strategic Approach to the Black Sea Region' (JOIN(2025) 135 final), issued jointly by the European Commission and the High Representative of the Union for Foreign Affairs and Security Policy on 28 May 2025, constitutes the most recent update to the EU's strategic framework for the region. Adopted in direct response to the deterioration of regional security following Russia's war of aggression against Ukraine, the Communication explicitly builds on — rather than replaces — the Black Sea Synergy, the CMA, and the Bucharest Convention, while reorganising EU engagement around three pillars: (i) security, stability, and resilience; (ii) growth and prosperity; and (iii) environmental protection, climate change resilience and preparedness, and civil protection. Each pillar is anchored by a flagship initiative — a Black Sea Maritime Security Hub, a Connectivity Agenda, and 'Reinforcing

Preparedness of Coastal Communities and Blue Economy Sectors,' respectively. The Communication credits the CMA with concrete progress in marine pollution management, Blue Economy entrepreneurship, coastal tourism, innovation, and environmental protection, and sets out further Blue Economy-specific actions, including prioritising and mobilising private sector investment in the Blue Economy and promoting the sustainable use of marine resources through maritime spatial planning, fisheries management, and aquaculture. It also proposes EU accession to the Bucharest Convention and identifies the monitoring of offshore gas and wind energy infrastructure off the Romanian and Bulgarian shores as a maritime security priority — directly relevant to Bulgaria's Black Sea coastal zone.

2.2.2 Common Maritime Agenda for the Black Sea (CMA)

The Common Maritime Agenda for the Black Sea (CMA) is the shared cooperative framework through which Black Sea countries — including Bulgaria — work towards a common vision for a sustainable, competitive, and resilient Blue Economy in the region. Building on the foundations established by the EU Black Sea Synergy, the CMA translates the regional strategic commitment into a Blue Economy-specific governance framework, articulating its vision through three goals: Goal 1 — healthy and resilient marine and coastal ecosystems; Goal 2 — a competitive, innovative, and sustainable Blue Economy; and Goal 3 — fostering investment and creating an enabling environment. The CMA is accompanied by a Strategic Research and Innovation Agenda (SRIA) and an implementation roadmap aligned with the EU Mission 'Restore our Ocean and Waters'. The BlueDial project uses the CMA as its operational framework, contributing through capacity building, knowledge transfer, and multi-level policy dialogue to the realisation of this shared regional vision.

Bulgaria is one of the seven CMA signatory countries, having endorsed the Agenda at the Ministerial meeting of 21 May 2019, following the 2018 Burgas Ministerial Declaration 'Towards a Common Maritime Agenda for the Black Sea'. Bulgaria participates directly in the CMA Steering Group through its National Coordinator – the MTC. In 2026, Bulgaria has assumed the role of CMA coordinator for the current year, succeeding Ukraine — a significant step reflecting Bulgaria's active engagement with the Agenda. The CMA Steering Group also includes as consultative and observer bodies: the Black Sea Commission (Bucharest Convention), the General Fisheries Commission for the Mediterranean (GFCM), the Conference of Peripheral Maritime Regions (CPMR), and the Managing Authority of the Interreg NEXT Black Sea Basin Programme. Implementation at national level is supported by the Black Sea Assistance Mechanism (BSAM); Marine Cluster Bulgaria (MCB) serves as the BSAM National Hub for Bulgaria, providing a direct institutional link between the CMA governance framework and Bulgarian maritime stakeholders.

2.2.3 Regional Governance: Bucharest Convention and the Black Sea Commission

The Convention on the Protection of the Black Sea Against Pollution (Bucharest Convention), signed on 21 April 1992 and entered into force on 15 January 1994, is the primary intergovernmental framework for marine environmental protection in the Black Sea. Its six contracting parties — Bulgaria, Georgia, Romania, the Russian Federation, Turkey, and Ukraine — established the Commission on the Protection of the Black Sea Against Pollution (Black Sea Commission / BSC), with Secretariat in Istanbul, as the permanent implementing body. The Convention is structured around three protocols: the Protocol on Protection against Pollution from Land-Based Sources; the Protocol on Co-operation in Combating Pollution by Oil and other Harmful Substances in Emergency Situations; and the Protocol on the Protection of the Black Sea Marine Environment against Pollution by Dumping.

The Strategic Action Plan for the Rehabilitation and Protection of the Black Sea (SAP-BSC), first adopted by the Ministerial Declaration of 31 October 1996 and substantially revised at the Ministerial Conference in Bucharest on 7 April 2009, constitutes the operational framework of the Bucharest Convention. The revised SAP-BSC (2009) establishes priority targets across four thematic areas: (i) reduction of nutrient and hazardous substance inputs from land-based sources (directly addressing the eutrophication status under MSFD Descriptor 5); (ii) conservation of biodiversity and protection of fisheries resources; (iii) integrated coastal zone management; and (iv) transboundary emergency response and anti-pollution cooperation. The SAP-BSC Ecological Objectives and indicators align closely with the Good Environmental Status (GES) descriptors of the MSFD, making the Bucharest Convention the primary international framework within

which Bulgaria's EU obligations under the Marine Strategy Framework Directive are contextualised. The BSC also publishes the Black Sea State of the Environment reports, which provide the regional data baseline underpinning national MSFD assessments.

For the purposes of this report, the Bucharest Convention and the SAP-BSC constitute a binding international obligation layer that sits above and alongside the EU legislative framework. All six Blue Economy sectors where Bulgaria operates — fisheries, coastal tourism, maritime transport, port activities, marine environment, and renewable energy development — are subject to BSC commitments on pollution control, biodiversity protection, and coastal zone management. A key governance gap is that the SAP-BSC's implementation monitoring relies on national reporting by contracting parties, without a mandatory EU-level enforcement mechanism equivalent to the MSFD infringement procedures. This creates an asymmetry: Bulgaria's performance under the MSFD is subject to EU Commission oversight (including infringement proceedings, as occurred in 2020), while its performance under the SAP-BSC is tracked through BSC periodic reviews with no equivalent legal consequences for non-delivery. The CMA Steering Group's inclusion of the BSC as a consultative body represents the primary institutional bridge between the two frameworks.

2.2.4 Overarching EU Maritime Policy

The EU Integrated Maritime Policy (IMP), adopted in 2007, provides the overarching framework for EU ocean governance, aiming to extract greater benefit from seas and oceans through cross-policy coordination. The IMP covers fisheries and aquaculture, maritime transport, marine environmental protection, marine research and technology, and maritime spatial planning. Its main instruments — the Marine Strategy Framework Directive (MSFD), the Maritime Spatial Planning Directive (MSP Directive), and the Blue Growth Initiative — each have direct application to Bulgaria's Black Sea governance context.

The European Green Deal reinforces the IMP by establishing binding decarbonisation trajectories affecting all maritime sectors — port operations, shipping, fisheries, coastal tourism, and offshore energy. The Blue Growth Initiative operationalises the IMP's economic dimension, identifying five priority areas of focus: aquaculture, coastal tourism, marine biotechnology, ocean energy, and seabed mining. Of these, the first three are directly relevant to the Bulgarian Black Sea context.

The EU Strategy on Resilient, Prosperous and Liveable Coastal Communities (COM(2026) 530 final, adopted 10 June 2026) constitutes the most recent addition to the EU maritime and coastal governance framework. Developed under the European Ocean Pact (COM(2025) 281 final), it is the first EU strategy to address coastal communities under a single coherent framework. It establishes three strategic objectives — Prosperity, Resilience, and Liveability — and sets out a cross-policy agenda integrating Blue Economy development, sustainable fisheries, climate adaptation, cohesion policy, and maritime cultural heritage. For Bulgaria, the strategy is directly relevant to the Black Sea coastal zone, where fishing communities, coastal tourism, and port infrastructure are all addressed as priority investment areas. The strategy calls on Member States to use Smart Specialisation Strategies (S3), cohesion funds, and European Maritime, Fisheries and Aquaculture Fund (EMFAF) Community-Led Local Development (CLLD) mechanisms as delivery instruments — channels already operational in the Bulgarian context.

The EU Industrial Maritime Strategy (Communication, 4 March 2026, DG Mobility and Transport, Commissioner Tzitzikostas) and the EU Ports Strategy (COM(2026) 112 final, 4 March 2026) were adopted jointly as the EU's comprehensive maritime competitiveness framework, delivered under the EU Competitiveness Compass and the European Ocean Pact. They constitute the primary EU-level policy instruments governing the development of EU shipping, shipbuilding, and port infrastructure, and are directly relevant to Bulgaria as a Black Sea coastal Member State with two TEN-T network ports and an active ship repair industry.

The EU Industrial Maritime Strategy is structured around three pillars. Pillar I ('Build, Equip and Repair') aims to reinforce EU maritime manufacturing capability and technological leadership through an EU Industrial Maritime Value Chain Alliance and a 'Shipyards of the Future' research initiative under Horizon Europe, accelerating digitalisation and circular transformation of European shipyards. Pillar II ('Transport

and Connect') addresses the competitiveness, sustainability and connectivity of maritime transport through administrative simplification for shipping, support for the green and digital transition, and reinforced EU engagement at the International Maritime Organization (IMO) to achieve a global level playing field. Pillar III ('Secure and Protect') bolsters naval, dual-use and military mobility capabilities, supports naval production capacity, and strengthens maritime domain awareness. Financing is mobilised through the Connecting Europe Facility (CEF), Innovation Fund, Horizon Europe, the European Defence Fund, and InvestEU risk-sharing instruments, with EU ETS revenues from maritime operators also identified as a national funding channel. A High-Level Maritime Industries and Ports Board, chaired by the Commissioner for Sustainable Transport and Tourism, has been established to coordinate implementation across Member States. For Bulgaria, the Strategy's continued state aid guidelines for maritime transport are directly relevant to the competitiveness of Bulgarian-flagged vessels, while the dual-use dimension is of strategic relevance given the Black Sea security environment (European Commission, COM, 4 March 2026).

The EU Ports Strategy establishes a comprehensive framework for the competitiveness, resilience, security and sustainability of EU ports. EU ports collectively handle approximately 74% of the EU's external trade, processing 3.4 billion tonnes of goods and serving nearly 395 million passengers annually, while supporting over 423,000 direct jobs. The Strategy addresses five priorities: (i) competitiveness, innovation and digitalisation, including governance criteria for strategic dual-use port infrastructure and guidance on foreign ownership; (ii) energy transition and sustainability, through an Electrification Action Plan for port electrification and deployment of onshore power supply; (iii) security, covering cybersecurity risk assessment, drug trafficking control frameworks, and port worker background checks; (iv) access to finance and investment, building on CEF, Cohesion Policy funds, and InvestEU, with a dedicated roadmap for small and medium-sized ports; and (v) social cohesion, skills and quality jobs, including a new Pact for Skills for the ports sector and integration into the Blue Generational Renewal Strategy. Both Burgas port (TEN-T Core Network, Orient/East-Mediterranean Corridor) and Varna port (Comprehensive Network) fall directly within the Strategy's scope. The security and dual-use dimension of the Strategy is of particular relevance for Burgas, given the Black Sea's heightened geopolitical risk environment and the port's strategic role in grain export flows and NATO-adjacent logistics (European Commission, COM(2026) 112 final, 4 March 2026).

2.2.5 Marine Environment and Spatial Planning

The Marine Strategy Framework Directive (MSFD) 2008/56/EC requires Member States to achieve and maintain Good Environmental Status (GES) of marine waters through six-year strategy cycles covering: initial assessment (Art. 8); GES definitions and environmental targets (Art. 9–10); a Monitoring Programme (Art. 11); and a Programme of Measures (Art. 13). Bulgaria has completed two full cycles; the Marine Strategy 2022–2027 constitutes the second-cycle update.

The MSP Directive 2014/89/EU establishes the framework for maritime spatial planning. Bulgaria was among the 20 of 22 EU coastal states that adopted their national MSP by the 2021 deadline, producing the Maritime Spatial Plan of the Republic of Bulgaria 2021–2035 (MSP). The Directive requires cross-border coordination; Bulgaria has a formal obligation to coordinate with Romania under both the MSP Directive and bilateral Black Sea basin frameworks.

The Water Framework Directive (WFD) 2000/60/EC and its associated River Basin Management Plans interact directly with marine space governance through coastal water body quality standards. The Black Sea River Basin Directorate (BDCHR) is the designated competent authority, responsible for managing coastal water quality and coordinating with the MOEW on MSFD implementation.

2.2.6 Biodiversity and Environmental Protection

The EU Biodiversity Strategy for 2030 sets a target of legally protecting at least 30% of marine areas. This directly shapes zoning requirements in the MSP, which notes that approximately 7.8% of Bulgaria's marine spaces are currently within the Natura 2000 network — significantly below the 2030 target. Expansion of

marine protected areas constitutes one of the key obligations under the Strategy with direct spatial planning implications.

The Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC) together form the legal basis for Natura 2000 in marine spaces. Bulgaria's marine Natura 2000 network covers approximately 282,000 ha — the third largest marine share in the EU. The conservation objectives of these sites are embedded in the MSP's Specific Conservation Zones (SCZ) and directly constrain permitted uses in designated areas.

The EU Biodiversity Strategy for 2030 specifies two nested marine protection targets: at least 30% of EU marine areas legally protected ('30×30 target'), with at least 10% under strict protection (no extractive activities). Bulgaria's current marine protected area coverage — approximately 7.8% of its marine space under the Natura 2000 network per the MSP 2021–2035 — represents a significant shortfall against the 30% target. Closing this gap requires the designation of new marine protected areas beyond the existing Natura 2000 sites, with associated management plans and binding conservation measures. This obligation is cross-cutting: it directly constrains spatial planning decisions for offshore wind development, marine aquaculture siting, and fisheries access areas, making it a governance priority with implications across multiple Blue Economy sectors (see Sections 3.2.1, 3.3.1, and 3.4 for sector-specific interactions).

The EU Strategy on Adaptation to Climate Change (COM(2021) 82 final), adopted on 24 February 2021, sets the framework for building climate resilience across all EU policies and sectors to 2030 and beyond. Its marine and coastal dimensions are directly relevant to Bulgaria's Black Sea context: the Strategy prioritises nature-based solutions for coastal protection, restoration of coastal and marine ecosystems as carbon sinks (Blue Carbon — see Section 3.4), and integration of climate risk into maritime spatial planning and port infrastructure planning. The Strategy supports the EU Mission 'Restore our Ocean and Waters by 2030', which provides Horizon Europe funding for climate adaptation research, including coastal monitoring and ecosystem restoration. Bulgaria's implementation of the EU Adaptation Strategy at national level is through the National Strategy for Climate Change Adaptation and Action Plan (CCAAP), adopted by Council of Ministers Decision № 621/25.10.2019 (see Table 2a). The CCAAP explicitly identifies Bulgaria's Black Sea coastal zone — which concentrates 95% of international tourism revenue — as highly climate-vulnerable, projecting sea level rise, coastal erosion, and increased frequency of extreme weather events affecting port infrastructure and coastal settlements. The absence of a successor adaptation action plan for the period beyond the CCAAP's current horizon, and the lack of a dedicated coastal adaptation investment mechanism, constitute a temporal governance gap identified in Section 2.7.4.

2.2.7 Fisheries and Aquaculture

The Common Fisheries Policy (CFP) — Regulation (EU) 1380/2013 — sets the ecological, economic, and social sustainability framework for fisheries and aquaculture. Bulgaria implements the CFP through the EMFAF Operational Programme 2021–2027, the Law on Fisheries and Aquaculture (LFA), and participation in the General Fisheries Commission for the Mediterranean (GFCM) Black Sea mechanisms. The Black Sea Advisory Council (BISAC) is the formal consultative body to the European Commission on CFP implementation in the Black Sea, with Bulgarian representation through BG FISH and the European Association of Fishermen in the Black Sea (EAFBS).

2.3 National Blue Economy Strategies and Policies

This section reviews the main national strategies, policy documents, and planning instruments relevant to the development of the Blue Economy in Bulgaria.

2.3.1 Maritime Spatial Plan 2021–2035 (MSP)

The Maritime Spatial Plan of the Republic of Bulgaria 2021–2035 (MSP) is the primary national instrument integrating Blue Economy uses in marine space. Adopted by Council of Ministers Decision in March 2023, it covers the territorial sea, internal maritime waters, and the Exclusive Economic Zone of Bulgaria in the Black Sea.

The MSP organises maritime space into four zone types: Prohibition zones — one permitted function due to safety requirements; Specific conservation zones — marine protected areas and cultural heritage zones; Multifunctional zones — where multiple uses coexist under defined conditions; and Zones of integrated management — requiring active cross-sector coordination. The plan covers maritime transport routes, port development areas, fishing zones, aquaculture sites, tourism anchorage areas, military zones, and environmental protection zones.

The MSP establishes four strategic goals: (1) Regulating and coordinating maritime uses; (2) Building a diversified and sustainable Blue Economy and viable territorial communities; (3) Raising maritime culture, education, and knowledge; and (4) Integrating ecosystem principles and sustainable practices. Strategic Goal 2 is the most directly relevant to CMA alignment and provides the spatial foundation for Blue Economy investment planning.

The MSP also represents one of the few national instruments requiring systematic coordination between maritime sectors, environmental authorities, infrastructure planners, and other stakeholders. As such, it providing a framework for balancing competing uses of marine space.

2.3.2 Marine Strategy of the Republic of Bulgaria 2022–2027

The Marine Strategy of the Republic of Bulgaria 2022–2027 is the second-cycle update under the MSFD, developed by the Black Sea River Basin Directorate (BDCHR) with scientific input from the Institute of Oceanology (IO-BAS). It has received Environmental Assessment clearance and was submitted to the European Commission.

The Marine Strategy assessment shows that Bulgarian Black Sea waters have not yet achieved Good Environmental Status (GES) for most monitored descriptors. Persistent pressures include eutrophication, marine litter, invasive non-indigenous species, impacts on biodiversity and commercial fish stocks, seabed disturbance, and underwater noise, indicating that further implementation of the Programme of Measures remains necessary to achieve the environmental objectives of the MSFD.

As Bulgaria's principal environmental policy instrument for the marine space, the Strategy is formally linked to the MSP, the National Recovery and Resilience Plan, the National Climate Change Action Plan, and the National Waste Management Plan 2021–2028. Its Programme of Measures (PoM) — 44 measures adopted by Council of Ministers Decision №918/2024, including 14 developed jointly with Romania — explicitly acknowledges that achieving Good Environmental Status in several areas depends on instruments governed by other ministries, underscoring the cross-sectoral coordination challenge that runs through Bulgaria's wider Blue Economy governance landscape.

Implementation progress reported to the European Commission under MSFD Article 18 (May 2025) is uneven: measures resting on existing regulatory routines — fisheries research, wastewater coordination, habitat conservation — are largely under way, while measures requiring new governance tools, dedicated funding, or inter-ministerial coordination, such as Natura 2000 management planning and cetacean monitoring, have yet to start. This pattern is consistent with MSFD implementation challenges seen across EU Member States more broadly.

Two structural constraints further limit implementation: the war in Ukraine has restricted offshore monitoring access, and 14 of the 18 new measures depend on coordinated action with Romania and other Black Sea states, introducing dependencies outside Bulgaria's unilateral control. These constraints are relevant to the design of any BlueDial-supported interventions targeting the marine monitoring and blue research sectors (see Section 3.2 and Section 3.4).

While the Marine Strategy provides a comprehensive framework for marine environmental governance, its scope is limited to the achievement of Good Environmental Status and associated environmental objectives. It does not provide an overarching framework for coordinating economic, social, innovation, and investment dimensions of Blue Economy development.

2.3.3 Integrated Transport Strategy 2030 — Maritime and Inland Waterway Transport

The Integrated Transport Strategy for the Period up to 2030 (NITS 2030), adopted by the Ministry of Transport, Information Technology and Communications (MTITC), is Bulgaria's principal national framework for the development of all transport modes to 2030. Chapter 4.5 of the strategy specifically addresses maritime and inland waterway transport and constitutes the primary national planning document for Bulgaria's port system and Danube navigation.

The strategy identifies a series of structural constraints limiting the functionality and competitiveness of the Bulgarian port system. The quay infrastructure at most sea ports does not correspond to modern vessel size trends, constituting a binding constraint for large-tonnage cargo owners. Approach channel depths at most terminals (with the exception of Terminal 2A in Burgas) are insufficient for modern fleet requirements. Cargo handling equipment is predominantly composed of portal cranes aged 30–50 years, with very limited modernisation investment in recent decades. A number of terminals — including Varna-East and Burgas-East, as well as Ruse, Svishtov, Lom, Oryahovo, and Tutrakan — are located within the urban fabric of their respective cities, generating road congestion, environmental pressure, and urban planning conflicts. Several terminals of regional significance lack rail connections, requiring all hinterland cargo movement to transit by road through urban streets. Fragmented ownership of port infrastructure across some terminals creates operational dependencies on individual private interests.

The strategy identifies as a priority the upgrade and maintenance of the Vessel Traffic Management and Information System (VTMIS) as part of the EU-wide SafeSeaNet Community system, contributing to maritime traffic safety, environmental incident response, and short-sea shipping facilitation. The strategy's investment priorities for the maritime and inland waterway sub-sector are directly relevant to the Blue Economy context: port modernisation, deepening of approach channels, intermodal terminal development, Danube channel maintenance, and decarbonisation-aligned infrastructure upgrades. These areas align with the port sustainability commitments articulated by BPIC (see Section 2.6.6) and with the broader Blue Economy investment gap identified in Section 4.

Beyond its transport function, the Strategy plays a significant role in enabling Blue Economy development by influencing the competitiveness of maritime trade, port-based industries, logistics services, fisheries value chains, and coastal tourism.

2.3.4 Other Key National Strategies

The following national strategic documents govern Blue Economy sectors without constituting a unified Blue Economy strategy. Taken together, they form a Tier 2–3 framework: Blue Economy dimensions are present, but as components of broader sectoral or territorial strategies rather than as an integrated policy commitment. Of particular importance is the Innovation Strategy for Smart Specialisation 2021–2027 (ISIS), which governs the distribution of EU structural fund support across all ERDF and ESF+ funded programmes. Within ISIS, the BE activities are explicitly referenced as subarea examples in three of its five thematic areas, though not as a standalone priority sector.

The strategies presented in Table 2a at the end of this section demonstrate that Blue Economy objectives are embedded across a wide range of national policy instruments. However, they also illustrate the fragmented nature of the current governance framework. Blue Economy-related priorities are distributed across sectoral strategies governing tourism, fisheries, aquaculture, energy, climate, innovation, transport, biodiversity, and regional development, without a dedicated mechanism for strategic coordination, implementation monitoring, or policy integration across sectors. Among these, maritime transport, port activities, and shipbuilding stand out as Bulgaria's most established and traditionally significant Blue Economy sectors, with the Integrated Transport Strategy 2030 (§2.3.3) providing their principal national planning framework.

Table 2a. Key National Strategies with Blue Economy Relevance (Bulgaria)

Strategy / Instrument	Tier	Blue Economy Relevance	Key Gap
Integrated Transport Strategy 2030 — Maritime and Inland	Tier 2	Bulgaria's principal national transport planning framework to 2030; Chapter 4.5 is dedicated specifically to maritime and inland waterway	Identifies extensive structural constraints — outdated quay infrastructure and cargo handling equipment, insufficient approach

Waterway Transport (NITS 2030)		transport, covering the national sea and Danube river port systems and setting investment priorities directly relevant to the Blue Economy: port modernisation, deepening of approach channels, intermodal terminal development, Danube channel maintenance, decarbonisation-aligned infrastructure upgrades, and the VTMS vessel traffic management system.	channel depths, urban-embedded terminals lacking rail connections, and a Danube navigational channel that does not meet Danube Commission design standards — without a dedicated implementation or financing roadmap tied specifically to Blue Economy objectives.
National Tourism Strategy 2014–2030 (NTS)	Tier 2	Governs coastal and maritime tourism — Bulgaria's largest BE sector (51% of Blue Economy GVA). Includes sustainable coastal tourism and quality labelling objectives.	Action Plan 2016–2021 expired July 2021; no successor adopted. New strategy in preparation as of 2026.
Integrated National Energy and Climate Plan (NECP) 2021–2030	Tier 3	Covers offshore energy planning and renewable energy transition affecting maritime space. References Black Sea offshore potential.	Does not designate offshore wind priority zones, despite the obligation under RESA (Law on Renewable Energy Sources). Bulgaria has zero installed offshore wind capacity.
National Recovery and Resilience Plan (NRRP) 2021–2026	Tier 2	Contains investments in port digitalisation, green port infrastructure, and sustainable coastal tourism.	Measures time-limited to 2026; no successor instrument with comparable coastal investment scope confirmed.
National Waste Management Plan 2021–2028	Tier 3	Includes marine litter reduction measures aligned with MSFD Descriptor 10 and the EU Plastics Strategy.	Marine litter (D10) GES not achieved; land-based sources remain the primary driver.
National Strategy for Climate Change Adaptation and Action Plan (CCAAP)	Tier 2	Adopted Council of Ministers Decision № 621/25.10.2019. Covers 11 sectors including tourism, transport, water, and biodiversity. Explicitly addresses the Black Sea coastal zone: identifies coastal summer tourism (95% of international tourism revenue) as highly climate-vulnerable; projects sea level rise impacts, coastal erosion, and flooding of coastal zones; identifies risks to port infrastructure and maritime transport from extreme weather events.	Action plan provisions are time-bound; no successor adaptation strategy adopted as of 2026. No dedicated coastal adaptation fund or implementation mechanism. Coastal tourism season extension (autumn/spring potential) identified but not operationalised.
National Fisheries Strategy (embedded in EMFAF OP 2021–2027)	Tier 2	Governs fisheries and aquaculture policy implementation; aligns with CFP objectives and GFCM Black Sea recommendations.	No standalone fisheries strategy document; policy embedded entirely within the operational programme.
Multiannual National Strategic Plan for Aquaculture 2021–2030 (MNSPA)	Tier 2	EMFAF-mandated planning document setting strategic objectives for sustainable aquaculture to 2030. Baseline: 16,500 t/year production (2019), 446 active fish farms, 866 FTE employees. Target: 20,000 t/year by 2030. Two strategic objectives: (1) sustainable, environmentally friendly aquaculture; (2) increased demand for locally produced aquaculture products. Identifies Black Sea marine aquaculture (currently only black mussel — <i>Mytilus galloprovincialis</i>) as a priority for diversification, with new species introduction, spatial analysis for farm sites, and specialised biotechnology laboratory proposed. MSP 2021–2035	Marine aquaculture in the Black Sea currently limited to black mussel; new species introduction and mariculture expansion depend on regulatory simplification not yet achieved. No specialised marine biotechnology laboratory established as of 2026.

		recognised as supporting aquaculture spatial planning. FLAGs/MIRGs and Producer Organisations identified as key delivery partners.	
Innovation Strategy for Smart Specialisation of the Republic of Bulgaria 2021–2027 (RIS3)	Tier 3	Provides the horizontal prioritisation framework for all ERDF and ESF+ funded programmes in Bulgaria 2021–2027, including the Programme for Competitiveness and Innovation in Enterprises (PCIE), the Programme for Research, Innovation and Digitisation for Smart Transformation (RIDST), and the regional development programmes. Blue economy activities are explicitly mentioned within three of its five thematic areas: (1) Industry for Healthy Living, Bioeconomy and Biotechnology — includes marine biotechnology, algae-based products, and aquaculture innovation as subarea examples; (2) Clean Technologies, Circular and Low-Carbon Economy — references green and low-emission maritime transport, port decarbonisation, and sustainable coastal infrastructure; (3) New Technologies in Creative and Recreational Industries — includes coastal and maritime tourism, water sports, and underwater cultural heritage as eligible activities.	Although Blue Economy activities appear as subarea examples within three thematic areas, the Blue Economy is not named as a standalone priority sector in the strategy or in any of the programmes it governs. Eligibility depends on fit within the thematic areas, resulting in fragmented and indirect coverage rather than a coherent investment focus.
National Development Programme Bulgaria 2030 (NDP 2030)	Tier 2	Adopted Council of Ministers, November 2020. Overarching national development framework with 13 priorities across 5 development axes. Priority 6.5 explicitly governs fisheries and aquaculture with three sub-areas: 6.5.a fisheries and aquatic biological resources (BGN 42M); 6.5.b competitiveness of the fisheries and aquaculture sector (BGN 77M); 6.5.c Blue Economy and fishing communities — supporting CLLD community development in coastal and inland fishing areas. Priority 7.3 governs maritime and port infrastructure: commits to port modernisation through PPP, new quay structures, Danube waterway maintenance, and reduced environmental impact of port operations. Target: raise port infrastructure quality index to EU average (current 4.23 vs EU average 5.0).	Blue Economy is referenced only within fisheries/aquaculture and transport sub-priorities. No dedicated Blue Economy priority or cross-sectoral coordination mechanism identified at programme level.
National Concept for Spatial and Regional Development 2026–2040 (NCRSD)	Tier 2	One of the few national strategic documents explicitly using the term Blue Economy. Identifies the Black Sea coast as a strategic development axis and promotes integrated territorial development, connectivity, coastal tourism, environmental protection, and sustainable use of marine resources. Provides the territorial development	Blue Economy is referenced as part of broader territorial development objectives rather than as a dedicated policy domain. No implementation mechanism or governance structure specifically focused on Blue Economy coordination is identified.

		context within which Blue Economy activities are expected to evolve.	
National Strategy for Small and Medium-Sized Enterprises (2021–2030)	Tier 3	Provides the primary policy framework for SME development and competitiveness, directly relevant to Blue Economy SMEs across fisheries, tourism, maritime services, and marine biotechnology. The updated Strategy comprises 119 measures aimed at improving competitiveness, promoting specialisation in higher value-added sectors, and fostering balanced regional development. Revision undertaken in line with the Governance Programme of the Republic of Bulgaria (2025–2029) under the priority area 'Competitiveness and Economic Growth'. Implementation supported through an Action Plan and annual implementation programmes.	The Strategy is horizontal and does not specifically target Blue Economy SMEs; Blue Economy sectors are not identified as priority specialisation areas.
National Industrial Strategy for Manufacturing and Mining Industry Sectors 2025–2030	Tier 3	Sets the industrial policy framework for manufacturing and mining industry sectors, relevant to the Blue Economy through coverage of shipbuilding, ship repair, marine equipment manufacturing, and offshore extractive activities in Bulgarian marine space. Prepared by the Ministry of Economy, Investments and Industry (MEII).	Specific measures and targets relating to maritime manufacturing are not yet confirmed in the publicly available text.
Long-Term Strategy for Climate Change Mitigation to 2050 (LTS 2050)	Tier 3	Adopted Council of Ministers, October 2022; submitted to the European Commission under the EU Climate Law. Sets Bulgaria's decarbonisation pathways for all sectors to 2050. Transport sector (including maritime) identified as emitting 26% of total GHG and 3.5 times more carbon-intensive than the EU average. Maritime transport is among the sectors where electrification is not fully achievable (alongside aviation); biomass, biofuels, and e-fuels identified as the transition pathway. Measures in the transport sector include: electrification, modal shift to rail, biofuels of the second generation. Offshore renewable energy (wind) mentioned as contributing to the energy system transformation, though no marine spatial designation is made. ETS maritime extension (CCLA/EU ETS) compliance trajectory implied for shipping actors.	The strategy does not designate offshore wind priority zones or set sector-specific maritime decarbonisation targets. Marine-specific measures are limited to general transport electrification and biofuels. The gap between this 2050 trajectory and the absence of offshore wind zoning (under RESA) remains unaddressed.
Strategy for Biodiversity in the Republic of Bulgaria 2021 (SBRB)	Tier 2	Adopted MOEW, Sofia 2021. Implements the EU Biodiversity Strategy 2030 at national level. Bulgaria falls within three biogeographical regions including the Black Sea region. The marine Natura 2000 network (282,000 ha) is a central commitment. Strategy identifies key pressures on marine and coastal habitats: extraction of river and marine species; pollution	No standalone marine biodiversity action plan; implementation dependent on Natura 2000 management plans, most of which are still in preparation. Marine ecosystem restoration targets are not yet translated into binding investment commitments.

		from drilling activities and oil transport in the Black Sea; thermal pollution of coastal waters; coastal erosion and loss of Black Sea dune habitats. The three species of Black Sea dolphins are designated as protected under Annex 3 of the BDA. Priority actions include: management planning for Natura 2000 zones; restoration of marine and freshwater ecosystems; control of invasive alien species (notably rapana — <i>Rapana thomasiana</i>). Aquaculture farms in Natura 2000 zones are identified as requiring specific biodiversity safeguards.	
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2.4 Legislative Analysis

2.4.1 Primary Maritime Legislation

The Law on Maritime Spaces, Internal Waterways and Ports (MSIWPA) is the primary maritime law, governing: maritime spatial planning (Arts. 516–51e); navigation and vessel traffic; port management; environmental obligations in marine space; and legal regimes for research, prospecting, and extraction in the EEZ and continental shelf. This law provides the constitutional basis for the MSP and defines the competent authorities for maritime governance.

Key implementation gap: the law does not comprehensively specify responsibilities for monitoring MSP application — a Ministerial Council regulation is required to fill this gap. As of 2026, this regulation has not been adopted, creating institutional uncertainty about the MSP's monitoring and enforcement regime.

The Commercial Shipping Code (CSC) is the foundational commercial maritime law and a significant omission from earlier versions of this analysis. The Code governs ship registration, maritime liens, ship mortgages, seafarer employment contracts, carriage of goods by sea, maritime collisions, salvage, general average, and liability for oil pollution damage. It is the primary instrument through which Bulgaria has incorporated key conventions of the International Maritime Organization (IMO) into national law, including: the International Convention for the Safety of Life at Sea (SOLAS, 1974), the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78), the Protocol of 1992 to the International Convention on Civil Liability for Oil Pollution Damage (CLC 1992), and the Maritime Labour Convention 2006 (MLC). Crew training and certification requirements under the Standards of Training, Certification and Watchkeeping for Seafarers Convention (STCW 1978, as amended by the Manila Amendments 2010) are implemented jointly through the CSC and secondary regulations issued by the Executive Agency for Maritime Administration (EAMA). The Code constitutes the statutory basis for commercial maritime operations at the ports of Varna and Burgas.

Issued pursuant to Article 65, paragraph 3 of the MSIWPA, the National Search and Rescue Plan in the Bulgarian Maritime Search and Rescue Region (NSARP) establishes the coordination and response framework for institutions and organisations involved in search and rescue operations following maritime and aviation distress events in the Bulgarian area of responsibility. The Plan defines the command structure, communication procedures, and institutional responsibilities for multi-agency SAR response, and constitutes the primary operational instrument for maritime safety governance in Bulgarian waters.

2.4.2 Environmental and Planning Law

The Law on Environmental Protection (EPA) provides the procedural basis for Strategic Environmental Assessment (SEA) of the MSP and other Blue Economy planning instruments. The Marine Strategy required and obtained SEA clearance (EO № 2-2/2024) before adoption. The Law on Biological Diversity (BDA) and the Law on Protected Areas (PAA) together implement the Habitats and Birds Directives, governing Natura 2000 designation and management in marine and coastal areas.

The Law on Climate Change Limitation (CCLA) implements the EU Emissions Trading System (ETS) maritime extension, imposing surrender obligations on shipping companies from 2024. This law is increasingly relevant for BPIC and maritime transport actors, as the EU ETS maritime scope expands to cover 50% of emissions from voyages between EU ports and non-EU ports.

The Law on Waters (WA) is the primary instrument transposing the Water Framework Directive 2000/60/EC into Bulgarian law, supplemented by the Groundwater Directive 2006/118/EC, the Environmental Quality Standards Directive 2008/105/EC, and the Floods Directive 2007/60/EC. The Law establishes the four Bulgarian river basin directorates, including the Black Sea Basin Directorate (headquartered in Varna) and the Danube River Basin Directorate (Pleven). It regulates discharge standards into coastal and transitional waters, water quality objectives for the Black Sea catchment, and the River Basin Management Plan cycle. The Law on Waters is directly relevant to Blue Economy activities where water quality standards, discharge authorisations, and hydrological status determinations affect aquaculture siting, port operations, and coastal tourism.

The Spatial Planning Act (SPA) does not transpose a single EU directive but implements, jointly with the EPA, the Strategic Environmental Assessment Directive 2001/42/EC and the Environmental Impact Assessment Directive 2011/92/EU (as amended by 2014/52/EU) for land-use and development decisions. It establishes coastal construction setback rules, controls development in the 2 km coastal zone, and governs general and detailed spatial plans for coastal municipalities. Its provisions operate alongside the Law on the Black Sea Coast (BSCA) in determining which developments are permissible in beach, tourist, and port zones. The Law on Spatial Planning is a key instrument for translating the Maritime Spatial Plan and national strategies into binding local land-use decisions.

2.4.3 Sectoral Laws

The Blue Economy is governed at sector level by the following primary legislation:

- Law on Fisheries and Aquaculture (LFA): the primary law implementing the CFP in Bulgaria, governing commercial fishing licences, aquaculture permits, fisheries control, and EMFAF beneficiary eligibility.
- Tourism Act (TA): governs beach concessions, tourist region designation, quality labelling, and the framework for coastal tourism promotion — the primary regulatory instrument for Bulgaria's largest Blue Economy sector.
- Renewable Energy Sources Act (RESA): requires designation of wind energy priority zones, including offshore areas. This obligation has not been fulfilled as of 2026, constituting the primary legal gap for offshore renewable energy development.
- Biodiversity Act (BDA): implements the Habitats and Birds Directives; governs Natura 2000 designation and management in marine and coastal areas, including the 282,000 ha marine network.
- Protected Areas Act (PAA): governs protected natural areas along the Black Sea coast and in the marine environment, including marine reserves and protected coastal landscapes.
- Cultural Heritage Act (CHA): governs the identification, protection, and management of underwater cultural heritage; the legal basis for the Institute for Underwater Heritage (formerly Centre for Underwater Archaeology, Sozopol).
- Ports and Port Facilities Act (as part of the MSIWPA): governs port concession agreements, port services regulation, and the mandate of the Bulgarian Port Infrastructure Company (BPIC) for state port infrastructure.
- Underground Resources Act (URA): governs the licensing of hydrocarbon exploration and extraction in the Bulgarian Exclusive Economic Zone and continental shelf. It transposes the Hydrocarbons Licensing Directive 94/22/EC and the Offshore Safety Directive 2013/30/EU, which sets minimum requirements for the safety of offshore oil and gas operations. The Law is implemented through authorisations issued by the Ministry of Energy and constitutes the regulatory basis for any future offshore extractive industry in Bulgarian marine space. It implements UNCLOS Article 77 sovereign rights over continental shelf resources.
- Concessions Act (CA): the framework law governing the award of concession contracts for public infrastructure and services. It transposes EU Concessions Directive 2014/23/EU. In the Blue Economy

context, the CA applies to: beach concessions awarded under the BSCA; port concessions (including port terminals within BPIC-managed areas); marina and waterfront concessions; and energy infrastructure concessions on public land or water surfaces. All concession procedures must comply with the CA's transparency and competitive tendering requirements.

Maritime transport and commercial shipping are governed at the primary law level by the Commercial Shipping Code (CSC) and the Law on Maritime Spaces, Internal Waterways and Ports (MSIWPA), both addressed in Section 2.4.1; there is no separate sectoral statute for maritime transport.

Shipbuilding and ship repair activities are not subject to dedicated sectoral legislation in Bulgaria: they are regulated under the general Commercial Act, standard environmental impact assessment procedures under the EPA and the SPA, labour law, and EU Regulation (EU) No 1257/2013 on ship recycling and green ship dismantling, which is directly applicable in Bulgarian law.

A more complete list of laws and regulations is attached in Annex 1.

2.4.4 Institutional Framework for MSP Implementation

The MSP identifies fourteen state institutions responsible for maritime security, twelve for marine environment protection, and multiple sector-specific agencies. The primary competent authorities are:

- Ministry of Regional Development and Public Works (MRDPW): Lead MSP authority; Consultative Council on Maritime Spatial Planning; strategic planning and programme coordination.
- Ministry of Environment and Water (MOEW): Marine Strategy; Natura 2000; EIA/SEA procedures; BDCHR (Black Sea River Basin Directorate) coordination.
- Ministry of Agriculture and Food (MAF): Fisheries policy; EAFA (Executive Agency for Fisheries and Aquaculture) oversight; EMFAF Managing Authority.
- Ministry of Transport and Communications (MTC): Maritime transport regulation; port infrastructure via BPIC; EAMA (Maritime Administration) oversight.
- Ministry of Tourism (MoT): Beach concessions; tourist region governance; National Tourism Strategy.
- Ministry of Energy (MoE): Offshore energy; hydrocarbon licensing; Integrated National Energy and Climate Plan (NECP).
- Ministry of Culture (MoC): Underwater cultural heritage; Institute for Underwater Heritage; plans for protection and management of cultural monuments.

The Consultative Council for Maritime Spatial Planning (established under the MSIWPA; regulated by Rules of Procedure promulgated DV No. 79/25.09.2018) coordinates all stakeholder interests across ministries, research institutions, and industry. It plays both advisory and approval functions in MSP preparation, review, and update procedures.

2.5 Alignment with the Common Maritime Agenda for the Black Sea

2.5.1 How National Goals Correlate with CMA Priorities

The shared vision for a sustainable Blue Economy in the Black Sea is operationalised through the CMA's three goals. This section assesses the degree to which Bulgaria's national planning and legal framework supports progress towards this common vision, drawing on the MSP's strategic objectives, the Marine Strategy's Programmes of Measures, and the sectoral legislation reviewed in Section 2.4.

CMA Goal 1: Healthy and Resilient Marine and Coastal Ecosystems

National alignment: STRONG at the formal level.

Bulgaria's commitment to marine environmental protection is supported by a comprehensive governance framework comprising the Marine Strategy 2022–2027 under the Marine Strategy Framework Directive

(MSFD), the Maritime Spatial Plan 2021–2035 (MSP), the Habitats and Birds Directives (implemented through the Biodiversity Act and the Protected Areas Act), and the Bucharest Convention. Together, these instruments provide the legal, planning, and institutional basis for the protection and sustainable management of marine and coastal ecosystems.

The Marine Strategy 2022–2027 establishes a comprehensive assessment, monitoring, and management framework, supported by a Programme of Measures comprising 44 measures, including actions addressing eutrophication, marine litter, invasive alien species, underwater noise, and biodiversity conservation. Alignment with CMA Goal 1 is further reinforced through MSP Strategic Goal 4, which promotes ecosystem-based management, pollution reduction, sustainable fisheries, and the integration of environmental considerations into maritime activities. The proposed expansion of the marine protected area network and implementation of Natura 2000 management measures contribute directly to the objectives of the EU Biodiversity Strategy for 2030 and the CMA's ecosystem resilience priorities.

Practical implementation gap: Despite the strong policy and legislative framework, Good Environmental Status (GES) has not yet been achieved for most assessed MSFD descriptors. Persistent challenges include eutrophication, marine litter, invasive alien species, pressures on commercial fish stocks, and incomplete implementation of certain Programme of Measures actions. Progress is further constrained by monitoring limitations, delayed implementation of some measures from the previous planning cycle, and the need for stronger coordination across institutions and governance levels.

CMA Goal 2: Competitive, Innovative, and Sustainable Blue Economy

National alignment: MODERATE – STRONG in established Blue Economy sectors such as maritime transport, ports, fisheries, aquaculture, and coastal tourism; MODERATE in research and innovation; and WEAK in offshore renewable energy.

Bulgaria's Blue Economy is estimated at 2% of GDP and 3% of national employment (direct effect). The MSP Strategic Goal 2 on diversified and sustainable Blue Economy development is the most direct national policy counterpart. The National Concept for Spatial and Regional Development (designates Varna and Burgas as the 'Portal Varna — Portal Burgas' Eastern Urban Axis, with innovation specialisation areas overlapping Blue Economy sectors.

The principal gaps affecting CMA Goal 2 relate to the limited integration of Blue Economy priorities across national policy frameworks, the absence of a dedicated Blue Economy strategy, and weak links between research, innovation, and commercial deployment. While Bulgaria possesses strong scientific and research capacity in areas such as marine monitoring, ocean observation, marine biotechnology, and coastal ecosystem research, there is no dedicated national mechanism to support the commercialisation and scaling of Blue Economy innovations.

Additional challenges include the absence of a national Blue Economy monitoring and data framework to support evidence-based policy making and investment planning, as well as the lack of designated offshore renewable energy priority zones under the Law on Renewable Energy Sources (RESA), which continues to constrain the development of offshore wind projects identified as a priority under the SRIA.

Marine biotechnology, ocean monitoring, and marine technology innovation are supported through national research institutions, particularly the Institute of Oceanology – Bulgarian Academy of Sciences (IO-BAS), as well as through major Horizon Europe initiatives such as DOORS and BRIDGE-BS, which have strengthened scientific capacity, marine data generation, and regional cooperation in support of Black Sea research and innovation. However, no dedicated national mechanism exists to systematically translate research outputs into commercial applications and Blue Economy market opportunities.

CMA Goal 3: Fostering Investment and Creating an Enabling Environment

National alignment: MODERATE — a broad range of EU and national funding instruments support Blue Economy-related investments, but the absence of a dedicated Blue Economy strategy and investment framework limits strategic coordination and prioritisation across sectors.

The MSP's Specific Goal 2.1 identifies Integrated Territorial Investments (ITI) as a mechanism for mobilising and combining public and private resources in support of marine and coastal development. At transnational

level, the Interreg NEXT Black Sea Basin 2021–2027 Programme, together with Horizon Europe, EMFAF, and other EU funding instruments, provides opportunities to support innovation, cooperation, capacity building, and investment across Blue Economy sectors. Bulgaria participates actively in regional initiatives aligned with the Common Maritime Agenda, including projects supporting stakeholder engagement, policy dialogue, innovation, environmental monitoring, and sustainable Blue Economy development. In addition, emerging cooperation platforms and innovation ecosystems, including the EIT Water Black Sea Regional Hub, contribute to strengthening links between research, business, public authorities, and investors. Together, these instruments and initiatives create a supportive framework for advancing the CMA objective of fostering investment, innovation, and an enabling environment for sustainable Blue Economy growth.

Key inhibitors include the absence of a national Blue Economy strategy and associated implementation mechanism; the lack of a coordinated investment roadmap across Blue Economy sectors; a lack of a national Blue Economy monitoring framework or database to support evidence-based policy and investment planning, etc.

2.5.2 CMA Alignment Rating Summary

The ratings presented in Table 2b represent a qualitative assessment of alignment between Bulgaria's national governance framework and the objectives of the Common Maritime Agenda. The assessment considers two dimensions:

(i) formal policy alignment, measured through the existence of relevant strategies, legislation, institutions, and planning instruments; and

(ii) practical implementation, assessed through available evidence on implementation progress, operational capacity, investment uptake, and observed governance gaps.

Table 2b. CMA Alignment Rating — Bulgaria

CMA Goal	Formal Policy Alignment	Practical Implementation	Overall Rating
Goal 1: Healthy and Resilient Marine and Coastal Ecosystems	Marine Strategy 2022–2027 adopted; MSP Strategic Goal 4; Natura 2000 marine network (282,000 ha); MSFD transposed; Bucharest Convention participation; comprehensive Programme of Measures in place	Moderate – Good Environmental Status not yet achieved for most assessed descriptors; implementation delays for some measures; monitoring constraints and transboundary dependencies remain	Moderate–Strong
Goal 2: Competitive, Innovative and Sustainable Blue Economy	Moderate–Strong – MSP Strategic Goal 2; NCRSD recognition of the Blue Economy; RIS3 support for Blue Economy-related activities; EMFAF 2021–2027; established sectors in maritime transport, ports, fisheries, aquaculture and coastal tourism; strong marine research capacity through IO-BAS and participation in initiatives such as DOORS and BRIDGE-BS	Moderate – No dedicated national Blue Economy strategy; limited commercialisation of research and innovation; fragmented policy support across sectors; lack of a national Blue Economy monitoring framework; offshore renewable energy development remains at an early stage	Moderate

Goal 3: Fostering Investment and Creating an Enabling Environment	Moderate – ITI framework in MSP; access to EMFAF, Interreg NEXT Black Sea Basin, Horizon Europe and other EU funding instruments; participation in CMA-related initiatives; emerging innovation and cooperation platforms supporting stakeholder engagement and investment facilitation	Weak–Moderate – No dedicated Blue Economy investment roadmap; fragmented governance and coordination across sectors; expired Tourism Strategy Action Plan; limited mechanisms for translating innovation into market deployment and investment opportunities	Weak–Moderate
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Bulgaria demonstrates a generally high level of formal alignment with the CMA for the Black Sea through its transposition of EU legislation, participation in regional governance frameworks, and adoption of key planning instruments such as the MSP and Marine Strategy. However, implementation remains uneven across CMA goals. The strongest alignment is observed in environmental governance, while investment coordination, innovation commercialisation, and emerging blue economy sectors like marine renewable energy remain comparatively underdeveloped.

The absence of a dedicated national Blue Economy strategy and cross-sector coordination mechanism remains the principal governance constraint affecting Bulgaria's ability to translate sectoral initiatives into a coherent Blue Economy development pathway.

2.6 Regional and Local Strategies

2.6.1 Overview

Achieving the shared vision for a sustainable Blue Economy in the Black Sea requires coordinated action at all levels of governance — from EU directives to national strategies, regional plans, and local implementation. In Bulgaria, this coordination is the central challenge. Governance of the Blue Economy is fragmented across multiple ministries, agencies, and administrative levels, with no single national-level coordination mechanism. This section maps the sub-national strategic landscape — from the national spatial framework through regional and municipal strategies to community-level instruments.

The three-tier relevance framework introduced in the Section 2 Introduction is applied to the regional and local strategies analysed below.

Particular attention is given to the extent to which regional and local planning instruments contribute to the implementation of the Common Maritime Agenda for the Black Sea, including the promotion of sustainable Blue Economy development, environmental protection, innovation, investment, and stakeholder participation.

2.6.2 National Spatial Framework — National Concept for Spatial and Regional Development (NCSRSD) 2026–2040

The National Concept for Spatial and Regional Development 2026–2040 (NCSRSD) sits at the top of Bulgaria's planning hierarchy and provides the overarching territorial reference for the Integrated Territorial Strategies (ITS) and municipal MIDPs. It designates a Black Sea Coastal Development Zone as one of six national development priority zones, explicitly naming the Blue Economy as a specialisation axis for this zone.

Varna and Burgas are designated as the 'Portal Varna — Portal Burgas' Eastern Urban Axis — two of Bulgaria's six first-tier urban centres — with innovation specialisation areas that directly overlap with Blue Economy sectors: clean technologies, circular economy, bioeconomy, and mechatronics. The concept thus

provides the territorial framework within which Blue Economy investment at regional and local level is expected to be justified and prioritised.

This makes the NCRSD one of the few national strategic documents that explicitly recognises the Blue Economy as a territorial development priority, providing an important policy bridge between national spatial planning and CMA objectives.

2.6.3 Regional Level: Integrated Territorial Strategies (ITS)

Both Integrated Territorial Strategies covering the Bulgarian Black Sea coast were adopted by Council of Ministers Decision RMS № 898 of 16 November 2022.

South-East Planning Region — Integrated Territorial Strategy (ITS-SE)

The South-East Integrated Territorial Strategy uses 'Blue Economy' as the explicit title of Specific Goal 1.2 — the most direct use of the Blue Economy label in any Bulgarian regional planning document. The goal covers: carbon emission reduction from ships; protection of aquatic biodiversity; sustainable development of fisheries; promotion of maritime and river tourism and recreation; and transition to a circular economy in maritime sectors. Coastal tourism is identified as a sector-defining industry for the Burgas district, accounting for over 40% of Bulgaria's mass tourism. Port of Burgas is the only Black Sea port in the core TEN-T network — a critical infrastructure distinction shaping regional investment eligibility.

North-East Planning Region — Integrated Territorial Strategy

The North-East Integrated Territorial Strategy opens with a maritime vision: North-East Region — Open to the Black Sea and the World. Specific Goal 1.2.1 — Support for a Sea-Related Economy — references the EU Integrated Maritime Policy, the Maritime Spatial Plan, and EMFAF fisheries and aquaculture investments. Port of Varna is the principal maritime infrastructure reference point, with maritime education and research (NVNA, TU-Varna, IO-BAS) identified as regional comparative advantages. The document acknowledges one important limitation: the region identifies itself as a modest innovator in EU terms, with innovation results declining between 2011 and 2019.

Together, the two Integrated Territorial Strategies demonstrate that Blue Economy priorities are embedded within regional development planning. However, their approaches differ: the South-East Region adopts an explicit Blue Economy framing, while the North-East Region emphasises maritime economic development through sectoral and innovation-oriented objectives. This reflects broader differences in regional economic structures and institutional capacities.

2.6.4 Local Level: Municipal Integrated Development Plans (MIDP)

All 14 Black Sea coastal municipalities have adopted MIDPs for 2021–2027. The depth of Blue Economy content varies substantially — from the comprehensive Burgas framework to base plans with limited sectoral specificity.

Burgas — An Example of Municipal Blue Economy Strategy

The Burgas MIDP 2021–2027 (335 pages, adopted 30 November 2021) is the most explicit and comprehensive Blue Economy document at municipal level on Bulgaria's Black Sea coast. Its strategic logic is built on Burgas's position on the TEN-T Orient/East-Med Corridor and includes Measure 1.4 ('Development of Blue Economy Sectors') as a dedicated implementation vehicle — the only such measure at municipal level in Bulgaria. The monitoring platform plan.smartburgas.eu provides public GIS tracking of implementation.

Several features distinguish Burgas from other municipalities in the mapping include: a dedicated Finances, Budget, Economy and Maritime Affairs directorate in municipal administration — not replicated elsewhere in Bulgaria; a digital monitoring platform with public GIS maps. The Blue Economy portfolio is completed by the Blue Growth and Smart Specialisation Strategy 2024–2030 — the only dedicated municipal Blue Economy strategy identified in Bulgaria — alongside a Tourism Strategy 2022–2030 and an Energy and Climate Strategy 2021–2030 of the municipality.

Varna Municipal Integrated Development Plan (MIDP)

The Varna MIDP 2021–2027 (2025 Annual Monitoring Report accepted 26 March 2026) contains significant Blue Economy investment distributed across separate measures: a Port for Fisheries and Marine Sports at Sveti Konstantin and Elena resort; maritime transport decarbonisation investments; and waterfront regeneration. Tourism is explicitly named as a sectoral priority in the Annual Monitoring Report 2025. However, these investments are not integrated under a unifying Blue Economy objective or monitoring framework equivalent to the Burgas model.

Other Coastal Municipalities

Three among the remaining twelve municipalities are particularly notable: Nesebar MIDP 2021–2027 and Actualisation 2024 integrates UNESCO World Heritage management with coastal mass tourism governance and Natura 2000; Balchik MIDP 2021–2027 includes five anchored measures for the marina and sailing infrastructure and eco-tourism; and Pomorie MIDP addresses salt production and health tourism as distinctive Blue Economy niches.

2.6.5 Community Level: Fisheries Local Action Groups (FLAG)

Bulgaria's Black Sea coast is covered by seven coastal fisheries Local Action Groups (FLAG) under EMFAF 2021–2027, as documented in the FAMENET CLLD Country Factsheet for Bulgaria (2024): Bulgarian Black Sea Agreement FLAG (BG301), Varna–Beloslav–Aksakovo FLAG (BG302), Pomorie FLAG (BG303), Shabla–Kavarna–Balchik FLAG (BG305), Primorsko and Tzarevo FLAG (BG312), Burgas and Kameno FLAG (BG313), and Sozopol and Malko Tarnovo FLAG (BG316). These are the most direct expression of CMA priorities at the community level and the only statutory mechanism translating national EMFAF programming into locally designed strategies for fishing areas. An additional eleven LAGs operate in inland and Danube fishing areas, bringing the national total to 18 fisheries LAGs with a combined CLLD budget of €24,267,432. Their CLLD strategies cover fisheries, aquaculture, and coastal tourism in an integrated manner, combining EU funding with municipal co-financing and private sector participation.

2.6.6 Port Infrastructure: BPIC and the Green Transition

The Bulgarian Ports Infrastructure Company (BPIC) manages port infrastructure at Varna and Burgas and is an important actor in the maritime green transition. The Annual Programme 2021–2025 (updated July 2025) commits to: sustainability and clean technology investments in port infrastructure; digital port operations; and energy efficiency upgrades. BPIC's obligations under Climate change limitation act (ETS maritime extension from 2024) and TEN-T green port standards make it a key actor for aligning Bulgarian port governance with EU green deal objectives.

2.6.7 EIT Water Black Sea Regional Hub

From 2026, Marine Cluster Bulgaria hosts the Black Sea Regional Hub of EIT Water — the Knowledge and Innovation Community for water funded by the European Institute of Innovation and Technology (EIT). Through this hub, Bulgarian Blue Economy actors gain direct access to EIT Water's pan-European innovation ecosystem, entrepreneurship programmes, and investment facilitation networks. The establishment of the Black Sea Regional Hub strengthens Bulgaria's access to European innovation, entrepreneurship, and knowledge-transfer networks relevant to Blue Economy development. In this respect, it contributes to addressing some of the innovation and collaboration challenges identified in regional development strategies, particularly in the North-East Planning Region.

2.6.8 Key Gaps at Regional and Local Level

Based on the analysis of the regional and local strategic landscape, the following gaps have the most significant impact on CMA implementation at sub-national level:

- Absence of a dedicated regional Blue Economy coordination mechanism below the Integrated territorial development strategies (ITDS). The ITDS strategies set Blue Economy objectives but do not create institutional structures to ensure their implementation. The Consultative Council on Maritime Spatial Planning operates at national level only.

- Only the Municipality of Burgas has adopted a dedicated Blue Economy strategy and embedded it in a monitoring framework — the only Tier 1 instrument at municipal level in Bulgaria. All other coastal municipalities address blue economy sectors through standard sectoral measures within their MIDPs, without integration or cross-sector monitoring.
- FLAG strategies cover fishing communities exclusively, leaving the broader coastal economy — coastal tourism, maritime transport, recreational activities — without an equivalent community-level planning instrument.
- Coastal tourism, accounting for 51% of Blue Economy GVA, is governed at local level solely through beach concession regimes and municipal tourism programmes, with no coordinated regional coastal tourism management plan.
- The offshore wind regulatory gap at national level (absence of wind energy priority zones under REL) cascades directly to regional and local level: no spatial planning inputs for offshore wind can be incorporated into ITDS or MIDP documents until national zones are designated.

2.7 Alignment and Coherence

2.7.1 How We Assess Alignment

Drawing on Sections 2.1 through 2.6, consistency across EU, national, and sub-national levels is evaluated against three practical dimensions:

- Formal policy integration: are Blue Economy priorities embedded in laws, strategies, and plans?
- Practical implementation: are those priorities being translated into funded projects and programmes?
- Institutional participation: is Bulgaria actively engaged in CMA implementation mechanisms and Black Sea governance bodies?

The overall pattern is consistent: Bulgaria's alignment is considerably stronger on formal policy integration than on practical implementation or institutional participation. Good legal and strategic foundations have been built — but the gap between what strategies say and what is funded and monitored is the defining feature of the current framework.

2.7.2 Areas of Effective Vertical Alignment

Maritime Spatial Planning is Bulgaria's strongest area. The MSP was adopted in 2023, cross-border coordination with Romania is mandated under the MSP Directive, and Bulgaria is among the 20 of 22 EU coastal states that adopted their national MSP on time.

Fisheries governance shows strong formal alignment. The Law on Fisheries, the EMFAF Operational Programme, and GFCM Black Sea participation provide a solid framework. The seven coastal FLAG strategies translate this into community-level action, complemented by eleven inland/Danube FLAGs across Bulgaria.

Environmental protection is formally robust — the MSFD framework, Bulgaria's Natura 2000 marine network (282,000 ha, third largest marine share in the EU), and participation in the Bucharest Convention are all in place.

Port sustainability is developing — BPIC's Annual Programme commitments to green transition and EU ETS maritime obligations in CCLA are aligned in direction, even if implementation is still at an early stage.

2.7.3 Identified Gaps in Vertical Alignment

The most pervasive gap is the limited translation of national and regional Blue Economy commitments into coordinated implementation at regional and municipal level. While the National Concept for Spatial and Regional Development (NCSRD), the Integrated Territorial Strategies (ITS), and several sectoral strategies explicitly recognise Blue Economy priorities, implementation mechanisms, monitoring arrangements, and dedicated funding pathways remain fragmented. Only Burgas has established a dedicated Blue Economy framework supported by a specific measure and monitoring mechanism within its MIDP, while most coastal municipalities continue to address Blue Economy sectors through separate sectoral initiatives.

Implementation gaps are also evident in several emerging Blue Economy domains. Although Bulgaria has developed strong capabilities in marine research, environmental monitoring, and participation in European innovation networks, limited commercialisation of research outputs, the absence of a dedicated Blue Economy monitoring framework, and weak integration between research, innovation, investment, and sectoral policy continue to constrain implementation. These challenges are particularly relevant for emerging activities such as marine biotechnology, ocean data services, blue innovation, and offshore renewable energy, where strategic ambitions are not yet fully matched by operational frameworks and investment pipelines.

Research and innovation shows a persistent gap between individual excellence and systemic capacity. Institutions like IO-BAS, Burgas Free University, and the Naval Academy are active in EU R&I networks — but there is no national Blue Economy database, no dedicated national programme connecting research outputs to commercial application, and no systematic public-private R&I co-financing mechanism for the Blue Economy. The implications for marine biotechnology and ocean data services are examined in Sections 3.3.2 and 3.3.3 respectively.

Fisheries governance displays a further alignment gap between formal policy robustness and structural sector weaknesses. While the EMFAF Operational Programme provides a sound investment framework, the persistent underperformance of recirculation systems and mussel farms against programme targets — documented in the 2020 situational analysis — points to a gap between funded capacity and operational capacity at enterprise level (see Section 3.2.1 — Marine Living Resources). Similarly, the expansion of marine aquaculture in the Black Sea remains constrained by the absence of streamlined spatial permitting and species diversification pathways not yet resolved at the regulatory level. The structural dimension of these gaps is further evidenced by the content of the Evaluation Plan for the Programme for Maritime Affairs, Fisheries and Aquaculture (PMFA) 2021–2027 (amended March 2026), which designates as planned — but not yet conducted — outputs a comprehensive Fisheries Sector Analysis for preparation of the 2028+ programming period and a Multi-annual National Strategic Plan for Aquaculture in Bulgaria. The absence of both documents at the mid-point of the current programming period confirms that no updated integrated assessment of either sub-sector is currently available to inform policy or investment decisions.

2.7.4 Three Structural Coherence Gaps

Gap 1 — Vertical: Between National Commitment and Local Implementation

The planning hierarchy from the National Concept for Spatial and Regional Development (NCRSD) through the Integrated Territorial Strategies (ITS) to MIDP carries the language of blue economy commitment downward — but not funded investment obligations, monitoring requirements, or coordination mechanisms. Only Burgas has chosen to make Blue Economy commitments operational at the municipal level through a dedicated strategy and a monitoring framework. All other coastal municipalities address Blue Economy sectors through sector-specific measures and investments, without adopting a dedicated Blue Economy framework or monitoring mechanism. This gap most directly impedes progress towards a competitive blue economy and an enabling investment environment at sub-national level.

Gap 2 — Horizontal: Fragmented Sectoral Governance

Multiple ministries, agencies, and public bodies share responsibilities for Blue Economy-related sectors, including transport, environment, fisheries, energy, tourism, regional development, innovation, and economic development, without a dedicated coordination mechanism. The Consultative Council on Maritime Spatial Planning is the closest equivalent, but its mandate is limited to the MSP process. Fragmented sectoral governance impedes progress across all dimensions of the shared vision — particularly coordinated ecosystem governance and cross-sectoral integration for a competitive Blue Economy.

Gap 3 — Temporal: Lag Between Strategy and Action

Several key documents are operating without current action plans. The National Tourism Strategy has no Action Plan since 2021. Several national and sectoral strategies require updating to reflect recent developments in EU maritime, coastal, fisheries, and ocean policy. This lag creates uncertainty about the durability of current commitments and reduces Bulgaria's capacity to contribute consistently to the evolving shared regional agenda.

The three structural coherence gaps identified above are independently confirmed by the World Bank policy note Bulgaria: Toward Blue Economy Development (2020) — the most comprehensive external diagnostic of Bulgaria's Blue Economy governance to date. The World Bank identified the absence of a dedicated national Blue Economy strategy as its primary policy recommendation; flagged the horizontal fragmentation of governance across at least nine ministries and agencies with no integrating mechanism as the central institutional obstacle; and noted the lag between strategy adoption and actionable implementation as a systemic characteristic of Bulgarian maritime policy. The World Bank (2020) also identified that Bulgaria had been referred to the Court of Justice of the EU over its MSFD reporting obligations (Case IP/20/1234, EC Press Release, 2 July 2020) — a compliance failure subsequently addressed by the adoption of the Marine Strategy 2022–2027, but reflective of the temporal gap that characterises Gap 3. The convergence of findings between the BlueDial analysis and the 2020 World Bank diagnostic provides additional support of the governance gap assessment and suggests that many of the identified challenges remain structural rather than temporary in nature.

2.7.5 Cross-Level Alignment and Coherence: Summary Assessment

Table 2c. Cross-Level Alignment and Coherence — Bulgaria

Governance Level	Formal Policy Integration	Practical Implementation	Institutional Participation	Overall
EU Framework	Strong — all relevant directives transposed; MSFD, MSP Directive, CFP, Natura 2000 in place	Moderate — transposition complete; implementation gaps in GES achievement and offshore energy	Strong — Bucharest Convention, GFCM, Interreg BSB participation	Strong
National	Moderate — MSP, Marine Strategy 2022–2027, sectoral laws; no dedicated national BE strategy	Weak–Moderate — Tourism Action Plan expired 2021; offshore wind zones not designated; no BE database	Moderate–Strong — CMA participation through the Steering Group, BSAM National Hub, Interreg NEXT Black Sea Basin Programme, GFCM, Bucharest Convention and MSP cooperation with Romania	Moderate
Regional	Moderate — ITS uses Blue Economy terminology explicitly (ITS-SE Goal 1.2); NCRSD spatial framework	Weak — ITS measures underspecified; limited dedicated regional funding for BE	Weak–Moderate — indirect participation through regional planning instruments and EU-funded projects, but no dedicated regional CMA governance mechanism	Weak–Moderate
Local / Community	Weak–Moderate — Burgas only Tier 1 instrument; other MIDPs Tier 2–3; FLAGs cover fisheries only	Weak — Blue Economy implementation concentrated in Burgas; FLAG coverage limited to fishing communities	Weak — no systematic local-level CMA participation mechanism	Weak

The overall assessment confirms a pattern of strong formal commitment at EU and national level, with progressively weaker practical implementation and institutional engagement at regional and local level. This vertical coherence gap is the defining structural feature of Bulgaria's Blue Economy governance framework.

2.7.6 Implications for the BlueDial Project

The analysis in Section 2 establishes the formal and practical dimensions of Bulgaria's Blue Economy governance framework. The three structural coherence gaps — vertical, horizontal, and temporal — define the current state: strong legal and strategic commitments at EU and national level are not consistently matched by funded programmes, institutional coordination, and monitoring mechanisms at regional and local level.

A more complete list of laws and regulations is attached in **Annex 1**.

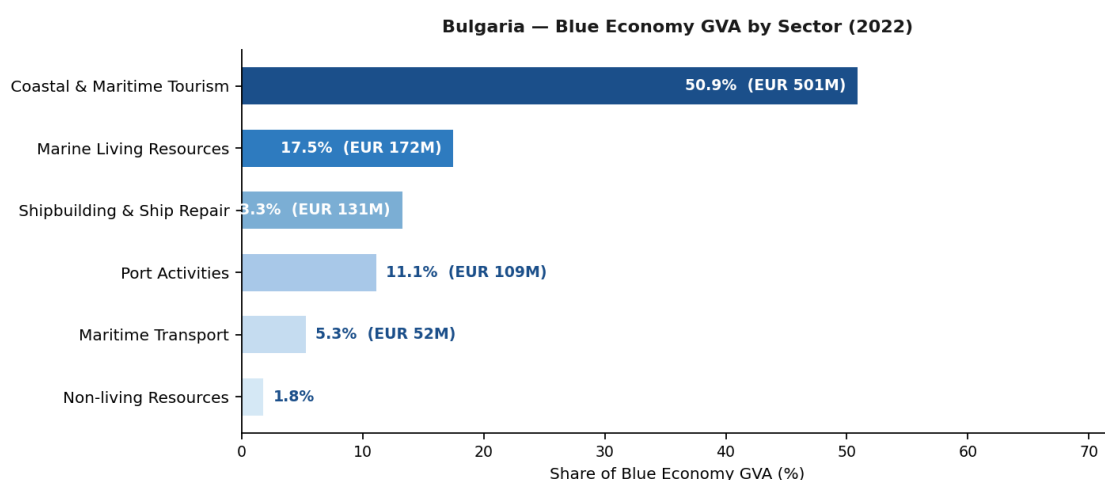
Section 3. Target Group Mapping and Sector Analysis

This section presents a structured analysis of Bulgaria's Blue Economy sectors, mapping the key institutional and private actors that constitute the target groups for BlueDial activities. For each sector, the analysis covers: (i) current economic status and significance; (ii) key actors and target groups; (iii) identified gaps and needs; and (iv) relevance to BlueDial objectives. The analysis draws on the Maritime Spatial Plan of the Republic of Bulgaria 2021–2035 (MSP), EU Blue Economy Observatory data (2009–2022), the EU Blue Economy Report 2025, the Report on the Results of the Regional Workshops Black Sea (Sofia, April 2025), and the Bluecomp Blue Skills Competence Framework.

3.1 Overview of Bulgaria's Blue Economy

The institutional and geographic context of Bulgaria's Blue Economy — including the coastal zone of fourteen municipalities as defined by the National Concept for Spatial and Regional Development 2026–2040 (NCRSD) — is documented in Section 1. According to EU Blue Economy Observatory data, Bulgaria's established Blue Economy sectors generated a combined Gross Value Added (GVA) of approximately EUR 984 million in 2022, with total employment of approximately 53,000 full-time equivalents (FTE). These figures represent a significant recovery from the COVID-19 contraction of 2020 and are broadly consistent with the long-term trend of nominal GVA growth alongside modest employment decline observed since 2009.

The Blue Economy is heavily concentrated in coastal and maritime tourism, which accounts for approximately 51% of sector GVA and 61% of FTE employment in 2022. Marine living resources (fisheries, aquaculture, and fish processing) constitute the second largest group by GVA (17.5%), followed by shipbuilding and ship repair (13.3%), port activities (11.1%), and maritime transport (5.3%). Marine non-living resources (oil and gas exploration, salt extraction) contribute approximately 1.8% of GVA. Emerging sectors — including marine renewable energy, marine biotechnology, ocean monitoring, and blue carbon — currently have no systematic economic quantification in Bulgaria.



Source: EU Blue Economy Observatory (EUBO), 2022 data.

Figure 3.1. Bulgaria — Blue Economy GVA by Established Sector (2022). Source: EU Blue Economy Observatory (EUBO).

Table 3.1. Bulgaria — Blue Economy GVA and Employment by Established Sector (2022)

Sector	GVA (million EUR)	Share of BE GVA	FTE (thousands)	Share of BE Employment
Coastal and Maritime Tourism	500.8	50.9%	32.1	60.6%
Marine Living Resources	172.0	17.5%	11.4	21.6%
Shipbuilding and Ship Repair	131.0	13.3%	4.5	8.5%
Port Activities and Logistics	109.4	11.1%	2.8	5.3%
Maritime Transport and Shipping	52.1	5.3%	1.6	3.1%
Marine Non-Living Resources	18.1	1.8%	0.4	0.8%
TOTAL (established sectors)	983.4	100.0%	52.9	100.0%

Source: EU Blue Economy Observatory (EUBO), 2022 data; compiled from national statistics and MSP sectoral analysis. Emerging and nascent sectors not included due to absence of systematic national data.

For historical comparison, the World Bank policy note Bulgaria: Toward Blue Economy Development (2020) — the most comprehensive independent sectoral diagnostic for Bulgaria — reported a combined Blue Economy GVA of approximately EUR 995 million and employment of 102,960 persons (3.4% of national employment) in 2018. These pre-pandemic figures already placed Bulgaria above the EU-28 average for blue economy employment share, and above comparator states including Italy and France. Coastal tourism accounted for 79% of blue economy jobs and 69.9% of GVA in 2018 — a concentration broadly consistent with the 2022 pattern. The 2018 pre-pandemic baseline is used in this report where current data are unavailable for specific sub-sectors, particularly yachting and maritime cultural heritage.

3.1.1 Sector Maturity Classification

For the purpose of target group mapping, sectors are classified into three maturity tiers reflecting their economic weight, institutional development, and readiness for capacity-building and innovation support:

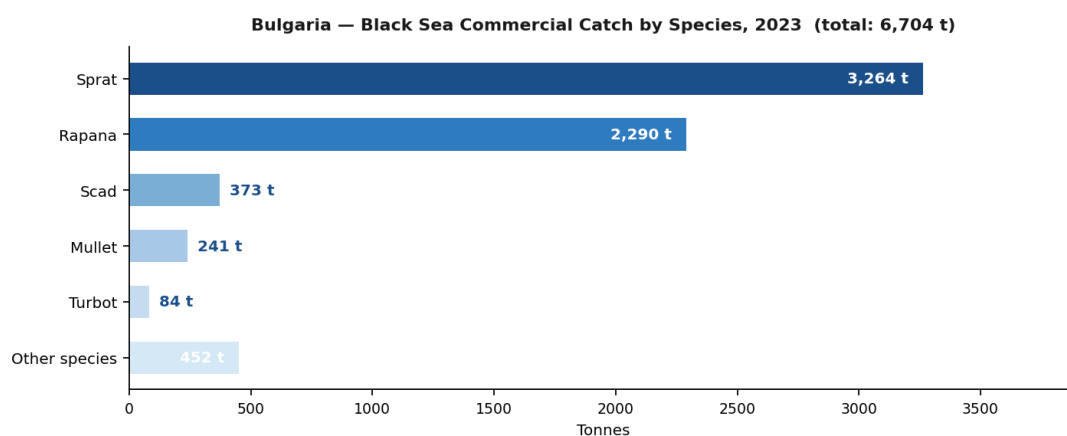
- Tier 1 — Established Sectors: sectors with quantifiable GVA and employment, established regulatory frameworks, and organised stakeholder representation. Capacity-building needs focus on innovation, green and digital transition, and inter-sector and cross-border coordination.
- Tier 2 — Emerging Sectors: sectors with growing activity but limited economic quantification, nascent regulatory frameworks, and early-stage stakeholder organisation. Capacity-building needs focus on enabling frameworks, demonstration projects, and access to EU funding.
- Tier 3 — Nascent/Pre-Commercial Sectors: sectors at research and pilot stage in Bulgaria, with no established commercial activity, limited domestic capacity, and strong dependence on EU-funded programmes. Needs focus on research-to-market pathways, competence development, and regional cooperation.

3.2 Tier 1 — Established Sectors

3.2.1 Marine Living Resources — Fisheries and Aquaculture

Marine living resources form Bulgaria's most diverse Blue Economy sub-sector, encompassing commercial sea fisheries, marine aquaculture, fish processing, and recreational fisheries. Governance rests with the Ministry of Agriculture and Food (MAF), through the Executive Agency for Fisheries and Aquaculture (EAFA), under the Law on Fisheries and Aquaculture (LFA). EU support is channelled through the European Maritime, Fisheries and Aquaculture Fund (EMFAF) Operational Programme 2021–2027 (PMFA), with a total budget of EUR 121.3 million. The sector as a whole — fisheries, aquaculture, and processing combined — generated EUR 172 million in GVA and employed approximately 11,400 FTE in 2022 (EUBO).

Bulgaria's Black Sea commercial fleet illustrates the sector's core structural challenge: 95% of the 1,205 active vessels are under 12 m, average sea days are about 19 per year, and the average vessel age is 23 years. The fleet has contracted by 27% since EU accession in 2007, largely through scrapping support. Against this backdrop, the 2023 total catch of 6,704 tonnes — up 19.8% on 2022 — represented a partial recovery, driven by a strong sprat season (+55% year-on-year). Figure 3.2 shows the species composition. Sprat and rapana together account for over 83% of total volume, underlining the fleet's dependence on two species. Turbot, commercially and ecologically the most sensitive stock, was landed at 84 tonnes against a quota of 92 tonnes, reflecting continued pressure on a biomass estimated at 803–1,185 tonnes. Per capita fish consumption in Bulgaria remains the second lowest in the EU at approximately 5–7 kg per household per year (NSI/IARA; MAF, Annual Agricultural Report 2024).



Source: Executive Agency for Fisheries and Aquaculture (EAFA); MAF Annual Agricultural Report 2024. "Other" includes Danube catch (37 t).

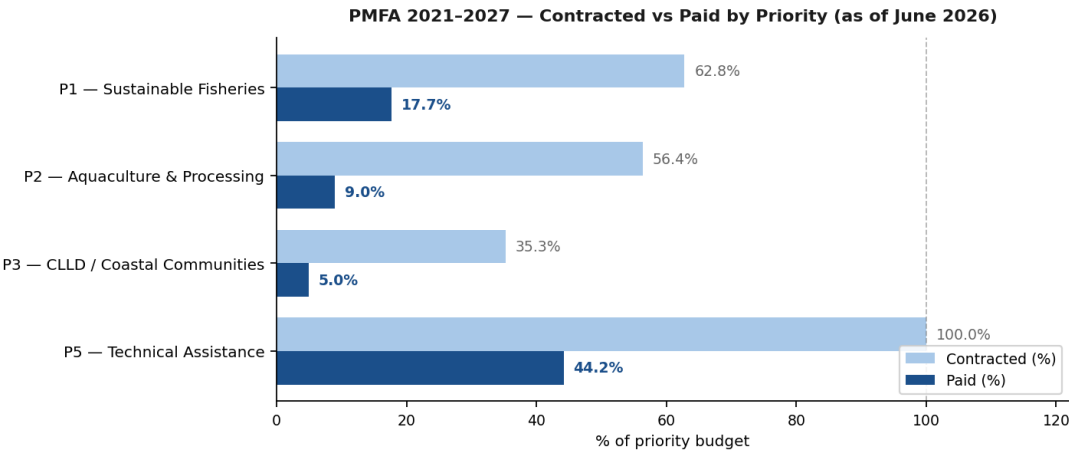
Figure 3.2. Black Sea commercial catch by species, 2023.

Aquaculture production reached 14,388 tonnes in 2023 across 740 registered farms — 719 freshwater and 21 marine. Freshwater production (rainbow trout, carp) dominates by volume; Black Sea mussel farming is the principal marine segment (2,552 tonnes in 2023), with niche high-value output from sturgeon and caviar operations. Production grew strongly between 2009 and 2019, peaking at 16,502 tonnes, before plateauing in the current decade. The sector's ambition — a national target of 20,000 tonnes by 2030 (Multiannual National Strategic Plan for Aquaculture, MNSP 2021–2027) — remains achievable but requires accelerated farm investment and regulatory simplification, particularly on water use licensing under the Law on Waters.

The 47 registered fish processing enterprises face a structural raw material deficit: domestic catch and aquaculture together cover only 45% of domestic fish product demand, compelling significant import volumes. Bulgaria's fish and seafood imports reached a record USD 196.7 million in 2025

— more than double the export value of USD 79.9 million. This is not simply a competitiveness issue: the leading import species (mackerel, shrimp, seabass, tuna, Atlantic salmon) are largely absent from domestic production, confirming that import flows meet genuine consumer demand for species diversity rather than substituting available local supply. At the same time, the processing base generates value-added exports — caviar, prepared trout and shrimp — primarily to Romania and Sweden, demonstrating integration into EU food supply chains that can be deepened with stronger domestic raw material supply (USDA FAS, BU2026-0004, April 2026).

Two decades of EU programme support have built real infrastructure — fishing port upgrades at Sarafovo, Pomorie, and Chernomorets, and aquaculture farm investment across both freshwater and marine segments — but have not resolved the sector’s structural weaknesses. The current PMFA 2021–2027 cycle shows overall payment execution of 13.1% (EUR 15.9M paid of EUR 121.3M total) as of June 2026, with divergent performance across priorities (Figure 3.3). Priority 1 (Sustainable Fisheries) is the strongest, driven by vessel decommissioning and harbour works. Priority 2 (Aquaculture and Processing) — the highest-potential sub-sector for growth — is the weakest in payment terms, a pattern that repeats across both the 2007–2013 and 2014–2020 cycles and mirrors EU-wide findings: the European Court of Auditors (Special Report 25/2023) found aquaculture consistently the lowest-absorbing priority across Member States throughout 2014–2020, attributing this to structural licensing and spatial planning obstacles recognised at EU level since 2011.



Source: EUMIS 2020, June 2026. Total budget: EUR 121.3M. Paid overall: 13.1% (EUR 15.9M).

Fig 3.3. PMFA 2021–2027 — Contracted and Paid Shares by Priority (June 2026)

Sector	Marine Living Resources (Fisheries, Aquaculture, Fish Processing)
Maturity	Tier 1 — Established
GVA (EUR, latest)	172 million EUR (2022, EUBO); fisheries sub-sector 3 million EUR (2017, MSP)
Employment (FTE)	~11,400 FTE (2022, EUBO); 1,947 persons in sea fisheries (2017, MSP/EAFA)
Key Actors / Target Groups	MAF (Ministry of Agriculture and Food) — managing authority; EAFA (Executive Agency for Fisheries and Aquaculture) — licensing and control; National Association of Black Sea Fishers; Association of Black Sea Mussel Producers; ~47 registered fish processing enterprises; 25 marine aquaculture farms (Burgas, Nessebar, Pomorie, Sozopol, Tsarevo, Kavarna); Institute of Fish Resources Varna (IFR, SAA) — turbot and sprat stock assessment; IO-BAS Varna (Institute of Oceanology, BAS) — pelagic stock assessment; Institute of Fisheries and Aquaculture – Plovdiv (IFA-Plovdiv, SAA) — freshwater research; 6 FLAGs/MIRGs (coastal and inland fisheries communities); GFCM Black Sea Working Group (multilateral); MCB (Marine Cluster Bulgaria)
Identified Gaps	Ageing, low-activity fleet (avg. 23 years; ~19 sea days/year; reduced 27% since 2007); total commercial catch in 2023: 6,704 t — a recovery vs 2022 but below pre-war baselines; turbot stock under pressure (biomass 803–1,185 t, TAC 92.14 t in 2023, catch 84.4 t); per capita fish consumption second lowest in EU-28 (~5.2 kg/household); domestic supply covers only 45% of fish product demand; aquaculture production declined 4.2% to 14,388 t in 2023 (EAFA data); stocking material production fell 41.5% year-on-year in 2023; low production plan fulfilment in funded aquaculture: 38% for RAS, 24% for mussel farms (2013–2018); limited producer organisations and weak horizontal integration; administrative burden of the Water Act (WA) for aquaculture farm registration identified as a structural barrier to sector growth (MNSPA 2021–2027); marine aquaculture constrained by spatial conflicts with tourism and navigation; absence of a specialised laboratory for marine biotechnology impedes new species introduction and mariculture diversification (MNSPA 2021–2027); SME access to EMFAF/PMFA funding limited by administrative and project preparation capacity
Development Outlook and Key Opportunities	The sector's development potential lies in: marine aquaculture expansion (mussels, sturgeon, seaweed), fleet modernisation aligned with the CFP fleet capacity plan, development of short supply chains and direct sales channels, and processing sub-sector growth using domestic raw material. The PMFA 2021–2027 includes planned calls of BGN 20M for productive aquaculture investments (Priority 2), BGN 15M for processing modernisation, and BGN 18.16M for fishing port infrastructure — creating a significant financing pipeline. Bulgaria's aquaculture share of EU production volume nearly doubled from 2009 to 2017 (0.62% to 1.15%), indicating growth potential if structural barriers are addressed. The MNSPA 2021–2027 further identifies skills development as a strategic priority: mandatory participation of qualified professionals in farm operations, establishment of lifelong training centres for aquaculture workers, and spin-off firms for technology transfer from research to production (MNSPA 2021–2027). Regional coordination through GFCM and the Black Sea Commission is central to sustainable stock management, including turbot quota-setting and rapana harvesting.

The commercial fisheries sub-sector remains structurally limited: an ageing, small-scale fleet (average 23 years; 27% reduction since 2007) and per capita fish consumption that is the second lowest in the EU-28. Total commercial catch in 2023 was 6,704 tons — a recovery of +19.8% over 2022 driven by sprat (3,264 t), but significantly below historical baselines due to regional unstable geopolitical situation in the Black Sea. National aquaculture production stood at 14,388 tons in 2023 (740 active farms; 21 marine).

3.2.2 Coastal and Maritime Tourism

Coastal and maritime tourism is Bulgaria's largest and economically most significant Blue Economy sector, contributing 50.9% of sector GVA (500.8 million EUR) and 60.6% of FTE employment (32,100 FTE) in 2022. It is governed under the Tourism Act (TA) and the National Tourism Strategy 2014–2030, administered by the Ministry of Tourism (MoT).

According to the National Statistical Institute (NSI), arrivals of foreign visitors travelling to Bulgaria for holiday purposes increased from 5.8 million in 2024 to 6.0 million in 2025. The Bulgarian Black Sea coast accounts for approximately 50% of these tourist arrivals.

Nautical and yachting tourism remains a developing segment of Bulgaria's coastal tourism sector, offering significant opportunities for investment, infrastructure development, product diversification, and the promotion of sustainable and higher-value tourism activities. The World Bank (2020) estimated approximately 1,000 registered yachts and motorboats in Bulgaria, with only 14 licensed marinas and total employment of approximately 800 persons in the segment — well below the comparable Baltic and Mediterranean markets. Key constraints identified include gaps in the legal framework governing the maritime industry and yachting, insufficient port infrastructure for satellite safety services, absence of a national yachting promotion strategy, and limited qualified marina management staff. Cruise tourism is similarly underdeveloped, contributing 0.23% of tourism GVA (2014) and 2.2% of sector employment, constrained by the inability of Bulgarian seaports to accommodate large cruise vessels without major infrastructure investment (World Bank 2020).

Sector	Coastal and Maritime Tourism
Maturity	Tier 1 — Established
GVA (EUR, latest)	500.8 million EUR (2022, EUBO); GVA growth +74.2% (2009–2017, MSP)
Employment (FTE)	~32,100 FTE (2022, EUBO); accommodation sub-sector alone: 26,000 persons (2017)
Key Actors / Target Groups	Ministry of Tourism (MoT) — national authority; Bulgarian Tourism Chamber; Bulgarian Hotel and Restaurant Association; Municipalities of Nessebar, Varna, Balchik, Sozopol, Primorsko, Burgas — major resort cluster operators; 1,421 accommodation establishments (formal sector, 10+ beds); beach concession holders (State agency via MOEW/MoT); Association of Bulgarian Yacht Clubs; 15 registered yacht ports (7 northern coast, 8 southern coast); MCB — active in maritime and coastal tourism cluster development
Identified Gaps	Despite its strong position within Bulgaria's Blue Economy, the coastal tourism sector faces several development challenges. These include the absence of an updated National Tourism Action Plan and coordinated regional coastal tourism management, persistent seasonality and price-based competition, limited integration of environmental carrying-capacity considerations into beach management, underdeveloped maritime and nautical tourism segments, insufficient diversification beyond traditional sun-and-sea tourism, and the lack of systematic monitoring of tourism-related environmental impacts. These areas represent important opportunities for enhancing the sector's sustainability, resilience, and long-term competitiveness.

Development Outlook and Key Opportunities

Sector growth potential is constrained by seasonality and price competition. Priority development directions include: nautical and maritime tourism product development; maritime cultural heritage circuits; eco-tourism and nature-based tourism in protected coastal areas; and digital marketing of coastal destinations. Development of the Black Sea cruise offer requires coordinated port and destination investment.

Tourism is one of Bulgaria's main Blue Economy sector, yet its growth is structurally fragile: concentrated in a short summer season, dependent on price competition, and governed by a strategy with no active implementation plan. The sector's transition toward year-round, higher-value, and environmentally sustainable products is the central challenge — and a direct opportunity area for Black Sea cross-border cooperation, particularly in nautical tourism, maritime cultural heritage, and eco-tourism development.

3.2.2a Maritime Cultural Heritage

Bulgaria's Black Sea coast holds a significant concentration of maritime cultural heritage assets: submerged prehistoric settlements on the Black Sea continental shelf (inundated following post-glacial sea-level rise), ancient Greek and Roman port structures and harbour complexes, shipwrecks spanning from antiquity to the modern era, and historic fortified port towns. The most prominent heritage site is Nessebar, a UNESCO World Heritage Site whose ancient port remains and submerged archaeological deposits constitute one of the best-documented maritime heritage complexes on the Black Sea. Protection of maritime cultural heritage is governed at international level by the UNESCO Convention on the Protection of the Underwater Cultural Heritage (2001), to which Bulgaria is a party, and at national level by the Cultural Heritage Act (CHA). The Maritime Spatial Plan of Bulgaria 2021–2035 (MSP) designates specific spatial protection zones for underwater cultural heritage, including concentrations of prehistoric shelf settlements and historic harbour remains. The EU Cultural Heritage Strategy (European Commission, 2018–2019) and the Faro Convention (Council of Europe, CETS No. 199) provide the wider European normative context, linking heritage preservation with community participation and sustainable cultural tourism.

Bulgaria's principal research institution in this field, the Centre for Underwater Archaeology (CUA) in Sozopol, was formally designated as a UNESCO Category 2 Centre (C2C) — now operating under the name Institute for Underwater Heritage — at the 43rd session of the UNESCO General Conference on 10 November 2025. The designation was confirmed by UNESCO's supreme governing body following a multi-year process involving the Ministry of Culture and the Ministry of Foreign Affairs; the implementing Agreement was subsequently ratified by the Bulgarian Parliament. UNESCO confirmed that the Institute's activities align with the Organisation's mission and contribute to several Sustainable Development Goals. The Institute carries a regional mandate for the Black Sea basin and the Lower Danube, covering research, conservation, and promotion of underwater cultural heritage, scientific exchange, capacity-building, and strengthening national inventories to combat the illegal trafficking of cultural property. UNESCO's feasibility study acknowledged that in several Black Sea riparian states, the absence of specialised state bodies for underwater heritage and insufficient resources for conservation and research represent systemic gaps — reinforcing the regional added value of the Institute¹.

¹ UNESCO C2C Feasibility Study, 2025; BTA, 10 November 2025; CUA Sozopol, 10 November 2025

Maritime cultural heritage is a growing niche for coastal tourism diversification. Heritage diving tourism around underwater archaeological sites, cultural heritage circuits linking Sozopol, Nessebar, and the maritime museums of Varna, and the integration of underwater heritage into cruise itineraries remain underexplored economic opportunities. The UNESCO designation of the CUA as an internationally recognised institute provides an institutional anchor for heritage tourism product development, international scientific collaboration, and educational field schools that attract specialist visitor segments.

Bulgaria's designation as host of the UNESCO Institute for Underwater Heritage (Sozopol, November 2025) establishes an internationally recognised institution with a Black Sea regional mandate at the intersection of underwater archaeology, heritage conservation, and sustainable tourism. The Institute represents a valuable asset for the development of cultural and maritime tourism and offers opportunities for stronger integration within broader Blue Economy and tourism development initiatives.

3.2.3 Maritime Transport and Shipping

Maritime transport is regulated by the Ministry of Transport and Communications (MTC) through the Executive Agency for Maritime Administration (EAMA), and by the provisions of the Law on Maritime Spaces, Internal Waterways and Ports (MSIWPA). It includes freight maritime transport (cargo shipping), passenger maritime transport (ferry, excursion, and cruise), and support services (maritime safety, vessel traffic services, hydrographic surveys).

Within the EU short sea shipping (SSS) framework, the Mediterranean and Black Sea combined accounted for 39% of all EU short sea goods by gross weight — 628 million tonnes in 2023 — the busiest SSS region in the EU (EU Blue Economy Report 2025). Bulgaria's seaports, positioned on the westernmost Black Sea coast, are structurally integrated into this SSS network, serving as transit points for Bulgarian export commodities (grain, metal products, chemical products) and for regional Black Sea supply chains. The development of a coordinated Black Sea SSS network remains an identified gap in the EU Strategic Approach to the Black Sea Region (2025) and in the SRIA Implementation Plan.

Bulgaria's seaports are geographically positioned as Black Sea terminals for the Middle Corridor (Trans-Caspian International Transport Route — TITR), which links Central and East Asia with European markets via the Caspian Sea, Azerbaijan, Georgia and the Black Sea. The Middle Corridor has been gaining strategic importance from a European trade and security perspective, as reflected in the publication of the EU Black Sea Strategy in May 2025 (JOIN (2025) 135 final). Ferry connections between Batumi (Georgia) and Burgas, and between Poti (Georgia) and Constanța, have increased in service frequency and cargo throughput in recent years. Container traffic on the full Middle Corridor reached approximately 57,000 TEU in 2024 — a fraction of the 18 million TEU seaborne containerised trade from Asia to Europe in the same year (middlecorridor.com; Clarksons Container Intelligence Quarterly, 2025Q3) — but with recognised growth potential. Bulgarian ports compete for Middle Corridor volumes not only with each other and with the Port of Constanța, but also with the port of Chornomosk (Ukraine) and the ports of Istanbul and Mersin (Turkey), all served by alternative route combinations. The Varna rail-ferry terminal at Lake Beloslav (Beloslav ferryboat terminal; 2 berths; capacity 3.5 million tonnes per year) has been used intermittently for rail wagon ferry services across the Black Sea to Ukraine and Georgia, providing a multimodal rail-sea interface on the corridor (RVO/Haskoning, 2025).

The sector faces significant and binding regulatory pressure from the EU's maritime decarbonisation package. From January 2025, the EU Emissions Trading System (EU ETS) has

applied to maritime shipping, obliging operators of vessels above 5,000 GT calling at Varna and Burgas to cover their reported CO₂ emissions with EU ETS emission allowances. The FuelEU Maritime Regulation (EU) 2023/1805, also in force from 2025, sets progressively tightening GHG intensity limits for ships above 5,000 GT at EU ports. From May 2025, the Mediterranean Sea has been designated a sulphur emission control area (SECA), tightening SO_x limits for vessels transiting between the Mediterranean and the Black Sea. At EU level, over 800,000 seafarers are estimated to require specific retraining in new technologies and alternative fuels by 2035 (EMTER 2025). These obligations create both compliance costs for Bulgarian SME shipping operators and an urgent upskilling requirement for the Naval Academy and maritime training institutions.

Bulgaria's inland waterway transport dimension is anchored on the Danube River, which constitutes the country's northern border for 364 km, from Vidin in the west to Silistra in the east. Bulgaria operates four commercial river ports on the Danube: Vidin (the western gateway, connected to Calafat, Romania by a combined road-rail bridge — the 'New Europe Bridge', opened 2013), Lom, Ruse (the principal Danube port, linked to Giurgiu via the Danube Bridge I road-rail bridge), and Silistra. All four ports are managed by the Executive Agency for Exploration and Maintenance of the Danube River (EAEMDR). The Danube forms part of the EU TEN-T Rhine–Danube Core Corridor, which directly connects Bulgaria's Danube ports to the Central European inland waterway network.

Sector	Maritime Transport and Shipping
Maturity	Tier 1 — Established
GVA (EUR, latest)	52.1 million EUR (2022, EUBO); freight sub-sector declined 30% (2009–2017, MSP)
Employment (FTE)	~1,600 FTE (2022, EUBO)
Key Actors / Target Groups	MTC — regulatory authority; EAMA (Executive Agency for Maritime Administration) — vessel registration, seafarer certification, port state control; Bulgarian Ship Owners' Association; Bulgarian Maritime Officers' Union; Navibulgar AD (Varna) — major Bulgarian shipping company; passenger transport operators along Nessebar–Varna–Burgas coastal route; cruise line representatives (MSC Cruises, Princess Cruises — historically active); Naval Academy 'Nikola Vaptsarov' (Varna) — seafarer training; Executive Agency for Exploration and Maintenance of the Danube River (EAEMDR) — Danube river ports authority (Vidin, Lom, Ruse, Silistra)
Identified Gaps	There is no national decarbonisation roadmap for the Bulgarian merchant fleet; EU ETS (from Jan 2025) and FuelEU Maritime (from 2025) create binding compliance cost burden for SME shipping operators calling at Varna and Burgas; limited cruise tourism development (from 77,000 cruise passengers in 2014 to near-zero by 2018); seafarer training at Naval Academy not yet aligned with alternative fuel requirements (EU-wide retraining need: 800,000+ seafarers by 2035, EMTER 2025); no coordinated Black Sea SSS network despite the Black Sea + Mediterranean accounting for 39% of EU short sea shipping (628 million tonnes, 2023); Middle Corridor container traffic (57,000 TEU in 2024) still marginal compared to seaborne Asia–Europe trade (18 million TEU), with Bulgarian ports competing against Chornomosk (Ukraine), Istanbul and Mersin (Turkey) for corridor throughput; Varna rail-ferry terminal at Lake Beloslav (3.5 Mt capacity) used only intermittently — full utilisation as a multimodal Middle Corridor node not yet achieved; Danube inland waterway transport (4 river ports: Vidin, Lom, Ruse, Silistra) not systematically integrated with Black Sea port logistics as part of multimodal supply chains — the Rhine–Danube TEN-T Core Corridor connection is underutilised; Danube navigability constrained by low-water events (2017–2019) with no national adaptation plan under development

Development Outlook and Key Opportunities

The sector faces binding regulatory pressure from the EU decarbonisation package (EU ETS, FuelEU Maritime, SECA designation). Development priorities include: national fleet decarbonisation roadmap; alignment of Naval Academy training with alternative fuel competencies; development of a Black Sea SSS network; and revival of cruise tourism through coordinated destination marketing. The Middle Corridor (TITR) represents a structural growth opportunity for Bulgarian maritime transport, particularly for the Batumi–Burgas ferry route and the Varna Beloslav rail-ferry terminal, as corridor volumes grow from their current 57,000 TEU base toward commercially significant scale; Bulgaria's competitive position will depend on price, service reliability, and multimodal connectivity compared to Turkish and Ukrainian alternatives. For inland waterways, the Rhine–Danube TEN-T Corridor presents an underutilised multimodal logistics opportunity: integration of Danube river freight with Varna and Burgas Black Sea port operations would constitute a structurally significant upgrade of Bulgaria's position in EU trade corridors.

3.2.4 Port Activities and Logistics

Bulgaria's port system is anchored by two major commercial seaports — Varna and Burgas — handling a combined 30.0 million tonnes of sea freight in 2023 (Eurostat, mar_go_aa). Burgas is the dominant port, accounting for 57–61% of combined throughput across the period 2016–2025: it handled 17.0 million tonnes in 2023 and reached a peak of 19.0 million tonnes in 2019. The Port of Varna handled 12.9 million tonnes in 2023, its highest recorded level in the series. Both ports experienced a sharp COVID-19 contraction in 2020 (Burgas: 14.7 Mt; Varna: 10.5 Mt) followed by recovery in 2021–2022. The 2024–2025 data show renewed contraction — particularly for Burgas (18.5 Mt in 2024, 15.2 Mt in 2025) — consistent with regional Black Sea trade disruption. Over the long term, both ports have exhibited moderate but consistent growth: Burgas at a compound annual growth rate (CAGR) of 1.7% and Varna at 1.5% over the period 2001–2024 (RVO/Haskoning, 2025). In 2023, the Port of Burgas ranked 56th and the Port of Varna 72nd among EU ports by gross weight of goods handled (EU Blue Economy Observatory, 2024). The two ports together serve approximately 4,300 vessel calls annually. State port infrastructure across both ports is owned and managed by the Bulgarian Ports Infrastructure Company (BPIC) under the Ministry of Transport and Communications, under a landlord port model. At Varna, the main cargo terminals (Varna East and Varna West) are operated by Port of Varna EAD, a 100% state-owned company. At Burgas, the dominant cargo terminals (Burgas East-2 and Burgas West) are operated under long-term concession by BMF Port Burgas AD, a private operator majority-owned by Advance Properties; the smaller Burgas East-1 terminal is operated by the state-owned Port of Burgas EAD.

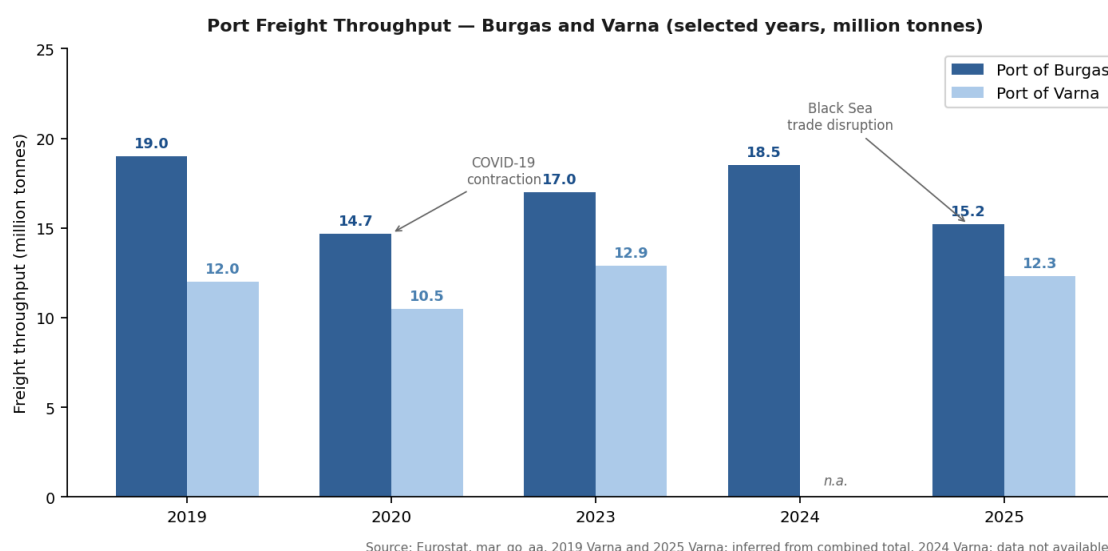


Figure 3.3. Sea freight throughput — Port of Burgas and Port of Varna, selected years (million tonnes). Source: Eurostat, mar_go_aa.

Burgas port is included in the EU TEN-T Core Network under the Orient/East Mediterranean Corridor; Varna port is in the Comprehensive Network. A significant infrastructure investment cycle at Burgas port, co-financed under successive Connecting Europe Facility (CEF)-Transport calls, has been completed in 2025–2026. The REBIRTH28 project (CEF-Transport-2021; total investment ~EUR 85 million, of which EUR 39.8 million EU grant) constructed the new deep-water Berth No. 28 at Burgas-West Terminal — 260 metres long and 15.5 metres deep, the deepest berth in Bulgaria, capable of accommodating vessels up to 80,000 DWT and 4,500 TEU — establishing the Advanced Container Terminal (ACT) Burgas with an annual handling capacity of 350,000 TEU (CINEA, 2025; RVO/Haskoning, 2025) — and was formally inaugurated in April 2025. The complementary FE2WC project (CEF-Transport-2023) constructed 3,680 metres of new internal railway tracks across Burgas-West and Burgas East-2 terminals, completed one year ahead of schedule by May 2026. Together, REBIRTH28 and FE2WC establish Burgas as a low-emission multimodal logistics hub on the North Sea – Baltic – Black Sea – Aegean Sea corridor. Further berth expansion phases (berths 25A, 26, and 27) are planned as the next development stage. Port of Varna, in the TEN-T Comprehensive Network, is pursuing a parallel investment path through the Programme for Transport Connectivity 2021–2027 (PTC), which provides ERDF co-financing to intermodal operators. Port Varna EAD is implementing a PTC-co-financed project (total value EUR 6.5 million; EU grant EUR 2.0 million) covering the procurement of new zero-emission cargo handling equipment and rehabilitation of on-site railway infrastructure, directly addressing intermodal capacity and green transition requirements (Procedure 2021BG16FFPR001-3.002, Priority 3). Together, the investments at Burgas and Varna represent the first systematic EU-financed decarbonisation cycle in Bulgarian port operations. Port activities generated 109.4 million EUR GVA in 2022 (11.1% of Blue Economy) and employed approximately 2,800 FTE.

Within the Black Sea regional context, the combined throughput of the Bulgarian commercial ports (30.0 Mt in 2023; Burgas ~19 Mt and Varna ~11 Mt in 2024) represents approximately one-half of the tonnage handled by the Port of Constanța, Romania — the largest port on the Black Sea — which handled approximately 67 Mt in 2023 (an exceptional peak attributable to re-routing of Ukrainian grain exports) and 58 Mt in 2024 (Netherlands Enterprise Agency, Market Study: Ports in Romania and Bulgaria, November 2025 [RVO/Haskoning]). On the investment side, two significant investment programmes are underway at or linked to Port of Varna. The first is at the

existing Varna West Terminal: Port of Varna EAD and Zarnen Terminal Varna Zapad AD (Zernen Terminal Varna West) jointly invested over EUR 25 million in Phase 1 (completed October 2023), comprising a specialised grain ship loader, conveyor systems, and 100,000-tonne silo storage at Berth 8 (loading rate: 450 t/hr; annual capacity: over 2 million tonnes of grain). Phase 2 (contract signed February 2024) added a new NEUERO high-speed ship loader and 210-metre conveyor system at Berth 15, raising the loading norm to 1,200 t/hr. Combined investment for both phases totals EUR 33 million; the system is fully electric with integrated dust-control technology, contributing to port decarbonisation objectives (Port of Varna EAD, press releases, October 2023 and February 2024). The second investment programme is at Lake Beloslav, approximately 25 km west of the Port: Logistic Centre Varna EAD (Buildcom/OLIVA Group) is constructing a new deep-water grain and bulk terminal, partially financed by a EUR 50 million loan from the European Investment Bank under InvestEU (EIB project EIB-2023-249, June 2023), with a design capacity of 3–4 million tonnes per year for grain, oilseeds and vegetable oils; the quay (12.5 m depth, 860 m total length in stage 1) was under construction as of end-2025 and expected to reach operational stage in 2026². In parallel, the European Bank for Reconstruction and Development (EBRD), in coordination with the International Finance Corporation (IFC), is conducting a full options analysis for the main Varna terminals (Varna East and Varna West), with identified investment needs exceeding EUR 500 million, including construction of new Berth No. 18 and fairway deepening to 13.5 metres draft (EBRD project, active through 2026). A second private grain terminal project is in preparation at the same location: Agria Group Holding is planning the Beloslav grain terminal with a capacity of 1.0–1.5 million tonnes per year (expanded from the current 0.7–0.8 Mt/year), with all required permits in place; a financing partner was being sought as of end-2025, with construction expected to take approximately three years following financial close (RVO/Haskoning, 2025). In addition, BPI Co. and the Ministry of Transport and Communications are developing plans for a greenfield intermodal terminal at Varna, comprising five berths with connections to both the national rail network and road infrastructure; design was ongoing as of end-2025 (RVO/Haskoning, 2025).

In addition to the two major commercial ports, the Bulgarian coast has 15 registered yacht ports and marinas (7 northern coast, 8 southern coast), and 4 river ports on the Danube. The Shabla marine jetty, an important small-craft infrastructure in the northern coast, is currently under restoration.

Sector	Port Activities and Logistics
Maturity	Tier 1 — Established
GVA (EUR, latest)	109.4 million EUR (2022, EUBO); turnover ~200 million EUR (2017, MSP)
Employment (FTE)	~2,800 FTE (2022, EUBO); over 4,000 persons directly employed in ports (2017)
Key Actors / Target Groups	BPIC (Bulgarian Ports Infrastructure Company) — state landlord and infrastructure manager; Port of Varna EAD (100% state-owned) — main cargo terminal operator, Varna East and Varna West; BMF Port Burgas AD (private concessionaire, majority owned by Advance Properties) — main cargo terminal operator, Burgas East-2 and Burgas West (including ACT Burgas); Port of Burgas EAD (state) — Burgas East-1 terminal; Port Lesport S.A. (private concession) — dry bulk, general cargo, vegetable oils, Varna; Agria Group Holding — Beloslav grain terminal project; Logistic Centre Varna EAD / Buildcom Group — EIB-financed grain terminal, Lake Beloslav; Bulgarian Ports Association; 15 yacht port operators along the Black Sea coast; Customs Agency and Border Police (port clearance)
Identified Gaps	Sea freight throughput declined from 31.0 million tonnes combined (2019 peak) to 27.5 million tonnes in 2025; Burgas contracted sharply to 15.2 Mt in 2025 (from

² (EIB press release, 27 June 2023; RVO/Haskoning, 2025)

	19.0 Mt peak in 2019), reflecting Black Sea regional trade disruption (Eurostat, mar_go_aa); port labour productivity declined relative to EU benchmark; no green port strategy or environmental management system adopted for Bulgarian ports; BPIC obligations under the CCLA (EU ETS maritime extension) not yet operationalised; shore power (OPS — onshore power supply) infrastructure absent at Varna and Burgas, despite the Alternative Fuels Infrastructure Regulation (EU) 2023/1804 requiring OPS deployment at TEN-T ports by 2030 (Burgas) and by 2025 for passenger and container ships; port digitalisation limited — electronic port community systems not yet deployed; yacht marina capacity insufficient relative to Adriatic and Aegean competition; no integrated port-city logistics plan for either Varna or Burgas
Development Outlook and Key Opportunities	Development priorities are the implementation of EU green port standards (TEN-T CEF-funded works at Burgas), deployment of onshore power supply (OPS) infrastructure, port digitalisation (electronic port community system), and development of yacht marina capacity. Burgas port's TEN-T Core Network status positions it as a regional logistics hub on the Middle Corridor trade route. At Varna, the EIB-financed Logistic Centre Varna grain terminal (EUR 50M InvestEU loan, operational 2026) will add 3–4 Mt/year of private grain handling capacity at Lake Beloslav. The EBRD/IFC options analysis (investment needs >EUR 500M) and a potential concession tender for Varna East and West terminals will define the medium-term development trajectory of the port.

Ongoing TEN-T-related investments in the Port of Burgas represent one of the largest Blue Economy infrastructure investment programmes currently being implemented in Bulgaria. At the same time, key elements of the port green transition — including onshore power supply, alternative fuel infrastructure, and advanced digitalisation measures — remain at an early stage of implementation. The expansion of EU climate and environmental requirements, including the maritime extension of the EU Emissions Trading System (EU ETS), FuelEU Maritime, and revised TEN-T sustainability requirements, is increasing the need for investment, technical capacity, and coordination across Bulgarian port governance institutions.

3.2.5 Shipbuilding and Ship Repair

Shipbuilding and ship repair is one of Bulgaria's most knowledge- and technology-intensive Blue Economy sectors, contributing approximately EUR 131 million in gross value added (13.3% of Blue Economy GVA) and employing around 4,500 FTE in 2022, despite accounting for only a small share of national GDP. The sector is concentrated primarily in the Varna region, which hosts the country's largest shipbuilding and ship repair cluster, including Bulyard Shipbuilding Industry, MTG Dolphin, Odessos Shiprepair Yard, and TEREM – KRZ Flotski Arsenal. In addition to these large shipyards, a number of specialised companies are active in the design and construction of small vessels, passenger boats, ferries, and innovative electric and hybrid craft, including companies and other producers serving tourism, inland waterway, and specialised maritime markets.

The concentration of shipbuilding, ship repair, maritime engineering, and vocational and higher education institutions in the Varna–Beloslav area makes it one of the most important maritime industrial ecosystems in the Black Sea region. An additional major ship repair facility operates in Burgas through KRZ Port Burgas. Together with a broad network of marine equipment manufacturers, engineering companies, subcontractors, and specialised service providers, more than 100 companies are estimated to operate in shipbuilding, ship repair, and related maritime industries along the Bulgarian Black Sea coast.

The sector has undergone significant structural transformation since 2009: new ship construction turnover declined by 70%, while ship repair and maintenance grew by 65% and marine equipment manufacturing grew by 57%. Labour productivity improved by approximately 50% during 2009–

2017, driven by specialisation in repair and retrofit services. Ship repair employment involves approximately 2,500 persons (2018). Navigation instruments and marine sports goods manufacturing employs approximately 200 persons in Varna, Burgas, and Pomorie. The sector's branch representative body is the Bulgarian National Association of Ship Constructors and Repairers (BNAKK).

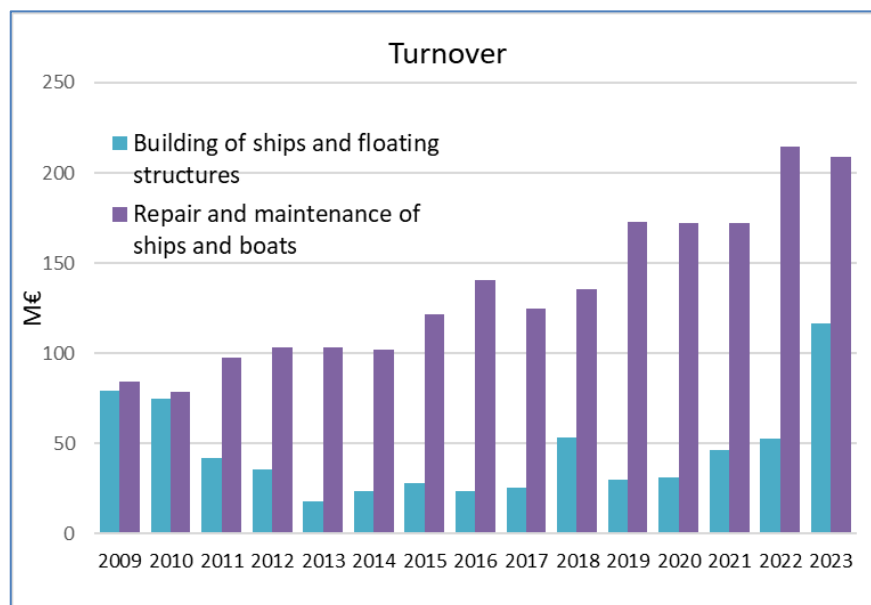


Fig. 3.4 Turnover by sector vs time

Sector	Shipbuilding and Ship Repair
Maturity	Tier 1 — Established
GVA (EUR, latest)	131.0 million EUR (2022, EUBO); sector restructured from construction to repair (2009–2017)
Employment (FTE)	~4,500 FTE (2022, EUBO); ship repair: ~2,500 persons; construction: ~2,000 persons (2018)
Key Actors / Target Groups	Bulyard Shipbuilding Industry AD (Varna) — largest new build yard; MTG Dolphin AD — tankers and bulk carriers; Odessos Shiprepair Yard (Varna) — ship repair and conversion; TEREM – KRZ Flotski Arsenal (Varna) — ship repair; KRZ Port Burgas (Burgas) — ship repair; BNAKK (Bulgarian National Association of Ship Constructors and Repairers); Technical University Varna — naval architecture and marine engineering faculty; Naval Academy 'Nikola Vaptsarov' (Varna) — maritime engineering education
Identified Gaps	No national strategy for green shipbuilding transition (LNG/ammonia/hydrogen retrofit); skills gap in alternative fuel systems, digital ship systems, and cyber-security; limited R&D investment and collaboration with research institutions; new ship construction capacity underutilised relative to repair demand; limited access to EU Innovation Fund and Horizon Europe for shipbuilding SMEs; no joint Black Sea shipbuilding network for cross-border procurement and standards
Development Outlook and Key Opportunities	The sector's transition from new construction to repair and retrofit presents an opportunity: demand for green retrofit services (scrubber installation, LNG conversion, digital systems integration) is growing EU-wide. Workforce upskilling in alternative propulsion systems and cyber-secure ship systems is the principal development need. Collaboration between yards and the Naval Academy on training is a structural opportunity.

3.2.6 Marine Non-Living Resources

Marine non-living resources in Bulgaria encompass offshore oil and gas exploration, natural gas extraction from coastal fields, and salt production from coastal lakes. The sector generated 18.1 million EUR GVA in 2022 (EUBO). Bulgaria's Black Sea EEZ contains two major active exploration blocks: Block 1-14 Silistár/Khan Kubrat (6,893 km²; Shell International 50%, Woodside Energy Bulgaria 30%, Repsol Bulgaria 20%) and Block 1-21 Khan Asparuh (14,019 km²; TotalEnergies 40%, OMV 30%, Repsol 30%). No commercial production from offshore blocks has commenced to date.

Onshore coastal natural gas is extracted from several fields (Galata, Kaliakra, Kavarna, Tyulenovo) by Petroceltik Bulgaria and 'Prouchvane i dobiv na نفت i gaz' AD. Salt production is operated exclusively by Chernomorski Solnitsi AD at Pomorie, with annual output of approximately 40,000 tonnes (peak 75,000 tonnes in 2003) and revenues of 7.1 million BGN (2017). The company holds a national market share of approximately 30% in table salt. No seabed sand or gravel extraction takes place in the open Black Sea; a sand concession operates in Lake Varna.

Sector	Marine Non-Living Resources (Oil, Gas, Salt, Minerals)
Maturity	Tier 1 — Established (extraction); Tier 2 — Emerging (offshore exploration)
GVA (EUR, latest)	18.1 million EUR (2022, EUBO); GVA growth +38% (2009–2017, MSP)
Employment (FTE)	~400 FTE (2022, EUBO estimate)
Key Actors / Target Groups	Ministry of Energy (MoE) — concessions and licensing authority; Shell International, TotalEnergies, OMV, Repsol, Woodside — exploration block holders; Chernomorski Solnitsi AD (Pomorie) — sole salt producer; Petroceltik Bulgaria — coastal gas extraction; Bulgarian Energy Holding (BEH) — state energy company, coordination role
Identified Gaps	absence of a coherent national framework for transition from fossil fuel extraction to Blue Economy renewable alternatives. offshore wind priority zones (required under the Renewable Energy Sources Act — RESA) not yet designated, creating spatial conflict between energy exploration and renewables development; no updated Strategic Environmental Assessment for offshore blocks post-2020; Chernomorski Solnitsi facing production decline due to climate-driven rainfall changes.
Development Outlook and Key Opportunities	Salt production at Pomorie faces long-term climate risk (reduced evaporation capacity). Offshore oil and gas exploration blocks have not yet produced commercial discoveries. The sector's long-term trajectory is shaped by the EU energy transition — the spatial footprint of existing exploration concessions requires integration into MSP planning for offshore renewable energy development.

3.3 Tier 2 — Emerging Sectors

3.3.1 Marine Renewable Energy

Marine renewable energy (offshore wind, wave and other emerging marine energy technologies) is identified as a priority area under the Common Maritime Agenda (CMA), the Strategic Research and Innovation Agenda (SRIA) for the Black Sea, and Bulgaria's Integrated National Energy and Climate Plan (NECP) 2021–2030. Although Bulgaria currently has no operational offshore renewable energy installations and the sector remains at an early stage of development, it represents one of the most promising emerging Blue Economy opportunities due to the country's favourable wind resource potential, established maritime engineering capabilities, and growing participation in European research and innovation initiatives.

Bulgaria possesses relevant scientific, engineering, and testing capabilities that could support participation in European offshore renewable energy value chains, including the development, testing, and validation of technologies and services for floating offshore wind applications. Institutions such as the Bulgarian Ship Hydrodynamics Centre and Technical University of Varna are actively involved in research, innovation, and pilot activities related to floating offshore wind technologies, positioning Bulgaria to contribute not only as a future deployment location but also as a provider of engineering, testing, simulation, and innovation services for international markets.

The principal constraint on sector development remains the absence of a comprehensive regulatory and planning framework for offshore renewable energy deployment. As of 2026, the designation of wind energy priority zones foreseen under the Renewable Energy Sources Act (RESA) has not been completed. This limits the integration of offshore renewable energy into maritime spatial planning processes and creates uncertainty for potential investors. Consequently, while Bulgaria possesses favourable natural conditions and emerging innovation capacity, the transition from research and planning activities to commercial-scale deployment remains at an early stage.

Sector	Marine Renewable Energy (Offshore Wind, Wave, Tidal)
Maturity	Tier 2 — Emerging (pre-commercial; regulatory gap)
GVA (EUR, latest)	Not quantified nationally; EU sector GVA: 0.4% of Blue Economy (2022, EU Blue Economy Report 2025)
Employment (FTE)	Not quantified nationally
Key Actors / Target Groups	Ministry of Energy (MoE) — designated zone obligation under the Renewable Energy Sources Act (RESA); MRDPW — MSP authority for offshore spatial planning; Energy and Water Regulatory Commission (EWRC) — licensing; Bulgarian Wind Energy Association (BWEA); Bulgarian Ship Hydrodynamics Centre (BSHC) — research, testing, and pilot activities related to floating offshore wind technologies; Technical University of Varna — floating offshore wind research and innovation; international offshore wind developers (monitoring Bulgarian EEZ); IO-BAS Varna — environmental baseline research for offshore development; I3Float project (and other EU initiatives) — supporting offshore energy start-ups
Identified Gaps	Renewable Energy Sources Act (RESA) offshore wind zone designation not fulfilled — the primary regulatory gap blocking the entire sector; no MSP-integrated offshore wind spatial plan; no national offshore wind permitting procedure; no dedicated EIA methodology for offshore wind in the Black Sea; limited domestic financial capacity and commercial-scale deployment experience, despite relevant scientific, engineering, and testing capabilities; no port infrastructure adapted for offshore wind installation and maintenance; absence of a national offshore wind supply chain
Development Outlook and Key Opportunities	Bulgaria's Black Sea EEZ has commercially viable offshore wind resources, but the sector is entirely pre-commercial due to the absence of designated offshore wind priority zones. Development of the enabling regulatory framework — Renewable Energy Sources Act (RESA) zone designation, MSP spatial allocation, dedicated EIA methodology — is the prerequisite for any investment. In parallel, Bulgaria's engineering, testing, and research capabilities — through institutions such as BSHC and Technical University of Varna — position it to participate in European floating offshore wind value chains as a provider of testing, simulation, and innovation services, even ahead of domestic commercial-scale deployment. Supply chain and port infrastructure development would be secondary steps.

Marine renewable energy is an emerging Blue Economy opportunity for Bulgaria, combining favourable offshore wind resources with growing national capabilities in maritime engineering, testing, simulation, and innovation. Bulgarian organisations, including the Bulgarian Ship Hydrodynamics Centre and Technical University of Varna, are already contributing to the development and piloting of solutions for floating offshore wind applications, creating opportunities for participation in European offshore renewable energy value chains. However, the transition from research and innovation activities to commercial deployment remains constrained by the absence of designated wind energy priority zones under the Renewable Energy Sources Act (RESA), which limits the integration of offshore renewable energy into maritime spatial planning and creates uncertainty for future investment.

3.3.2 Marine Biotechnology

Marine biotechnology is a strategically emerging sector at the intersection of biodiversity, health, food, and bioeconomy. In Bulgaria, the sector is at an early development stage, characterised by active research, particularly at the Institute of Oceanology-BAS (IO-BAS) and Varna Medical University (VMU), without yet generating systematic commercial activity or national-level economic statistics.

Identified areas of marine biotechnology activity in Bulgaria include: research into bioactive compounds from Black Sea algae species (VMU is conducting large-scale research on five algae species — one red, two green, two brown — for cosmetic, pharmaceutical, and nutraceutical applications); therapeutic and cosmetic use of mineral brine from coastal salt lakes (Pomorie lake, Tuzlata near Balchik, Shabla, Lake Varna); therapeutic mud therapy from Black Sea coastal lakes; and research on marine microbial diversity. EU projects SEAREFINERY and WASTE2TASTE have been active in Bulgaria, developing marine biotechnology value chains. The Black Sea Accelerator (EC initiative) supports start-up development in marine biotechnology.

The new EU Bioeconomy Strategy (adopted December 2025, led by Commissioner Roswall, DG Environment) establishes the overarching policy framework within which marine biotechnology development in Bulgaria should be positioned. The Strategy is structured around four pillars: Pillar I (circular and resource-efficient bioeconomy), Pillar II (From Lab to Fab — scaling up biotech innovations and biomanufacturing), Pillar III (securing sustainably-sourced biomass), and Pillar IV (globally competitive European bioeconomy). For Bulgaria, Pillar II is the most immediately relevant: it directly addresses the research-to-market gap that characterises the current stage of Bulgarian marine biotechnology — active research at IO-BAS and VMU without yet generating systematic commercial output. The Strategy explicitly identifies biotechnology as one of four critical technology pillars under the Strategic Technologies for Europe Platform (STEP), alongside digital, clean energy, and defence technologies, signalling elevated funding priority across all EU programmes (European Commission, Tikkanen, EBSF2025 presentation, 2025; EU Bioeconomy Strategy Factsheet, KH-01-25-224-EN-N, November 2025). The European Oceans Pact (2025) is explicitly listed in the Strategy's policy interplay map as the blue economy linkage instrument, connecting the Bioeconomy Strategy directly to EMFAF-funded activities and the Common Fisheries Policy. This is the formal policy architecture enabling EMFAF blue bioeconomy innovation calls to align with Bioeconomy Strategy Pillar II objectives.

At EU level, the blue biotechnology sector recorded a turnover of EUR 973 million in 2023 (+3% year-on-year), with GVA of EUR 317 million and approximately 2,500 persons directly employed (average wage EUR 65,600 per year). The EU blue biotech enterprise base comprised at least 203 companies as of April 2026, with a total economic valuation of EUR 3.2 billion — a 421% increase since 2018. Investment activity has accelerated: from 90 deals in the period 2000-2018, the sector attracted 114 deals between 2018 and 2023 (average 19 per year), with 55 deals

concluded in 2023-2024 alone; total disclosed investment exceeded EUR 450 million over the full period. Despite this growth trajectory, the sector remains at an early investment stage: 67% of all deals are seed or early-stage, with only 2% reaching growth stage, reflecting the long validation cycles and high CAPEX characteristic of marine-derived compound development (EU Blue Economy Observatory, Blue Biotechnology sector profile, updated May 2026). EU geographic concentration is pronounced — Germany (20% of jobs, 25% of GVA), France (16% / 20%), Spain (11% / 10%), and Italy (10% / 12%) account for the majority of sector activity. Bulgaria is not currently represented in EU blue biotechnology economic statistics, indicating that the research base at IO-BAS and VMU has not yet translated into enterprises captured in national or EU reporting.

The primary applications most relevant to Bulgaria's resource base are: (a) bioactive compounds from Black Sea macroalgae and microalgae for pharmaceutical, cosmetic, and nutraceutical applications — supported by VMU's existing five-species research programme and by EU demand for omega-3 fatty acids, antioxidants, and anti-inflammatory compounds from marine sources; (b) valorisation of fisheries and aquaculture by-products (rapana shells, mussel processing waste, fish processing side-streams) through circular biorefinery approaches — an area explicitly supported under the EU Algae Initiative (COM 2022/592) and the Bioeconomy Strategy's Pillar I; (c) bioremediation using marine microorganisms for Black Sea pollution management, which addresses the World Bank-identified coastal pollution legacy (10 highly polluted beaches) while generating commercial value; and (d) standardisation and EU certification of therapeutic brine and mineral lake resources (Pomorie, Tuzlata, Shabla) for integration into health tourism and functional cosmetics value chains. The proposed EU Biotech Act (2025) — providing fast-track permitting and priority EIB financing for strategic biotech projects — directly reduces the regulatory barriers that have historically impeded Bulgarian marine biotech SME development. Funding pathways include: Horizon Europe Cluster 6 (marine biotechnology calls), the Circular Bioeconomy Europe Joint Undertaking (CBE JU), EMFAF Priority 2 innovation calls under PMFA 2021-2027, BlueInvest technical and financial support, and the Sustainable Blue Economy Partnership (SBEP) annual calls.

Sector	Marine Biotechnology
Maturity	Tier 2 — Emerging (research active; commercial stage nascent)
GVA (EUR, latest)	EU sector: EUR 317M GVA, EUR 973M turnover (2023, EUBO); Bulgaria: not yet quantified nationally (pre-commercial stage)
Employment (FTE)	EU sector: ~2,500 FTE directly employed (2023, EUBO); Bulgaria: research community ~50-100 researchers (estimated, IO-BAS + VMU)
Key Actors / Target Groups	IO-BAS Varna (Institute of Oceanology, BAS) — marine biodiversity and monitoring research; Varna Medical University (VMU) — algae bioactive compound research (5 species); Pomorie Rehabilitation and Recreation Centre — therapeutic brine and mud; Balneological complex Tuzlata (Balchik) — mineral lake therapeutic services; Bulgarian National Science Fund — research co-funding; CBE JU / Horizon Europe Cluster 6 — EU R&I funding channels
Identified Gaps	No national programme connecting marine research outputs to commercial application; no dedicated funding instrument for blue biotech SME development at national level; limited IP protection framework for marine biological resources (Nagoya Protocol/ABS Regulation compliance capacity low); therapeutic brine and mud facilities lack EU-standard certification for health claims; no marine biobank or shared biological sample infrastructure; access to Horizon Europe Blue Bioeconomy and CBE JU calls limited by administrative capacity; absence of lab-

	to-pilot scale infrastructure for marine-derived compound processing; Bulgaria absent from EU blue biotechnology enterprise statistics (EUBO 2023)
Development Outlook and Key Opportunities	The EU Bioeconomy Strategy 2025 (Pillar II: From Lab to Fab) and the proposed EU Biotech Act create a materially more enabling regulatory and funding environment than existed under previous programming periods. Bulgaria's marine biotech assets — Black Sea algae biodiversity (5 species under active VMU research), endemic species (rapana, endemic microalgae, therapeutic brine organisms), mineral lake therapeutic resources (Pomorie, Tuzlata, Shabla), and institutional capacity at IO-BAS and VMU — constitute an underutilised but credible foundation for sector development. The primary bottleneck is the absence of a national research-to-market pathway and lab-to-pilot-scale infrastructure. The European Oceans Pact (2025) as the explicit blue economy linkage to the Bioeconomy Strategy opens EMFAF Priority 2 (Aquaculture and Processing) as a co-financing channel for blue bioeconomy innovation under PMAF 2021-2027.

3.3.3 Ocean Monitoring and Data

Ocean monitoring, data management, and environmental observation underpin all other Blue Economy sectors but are not captured as a standalone economic sector in national statistics. Bulgaria has a comparatively strong scientific infrastructure for Black Sea monitoring relative to its size, but significant gaps exist in the coherence, continuity, and accessibility of monitoring data. Environmental pressures add urgency to this monitoring mandate: the World Bank (2020) identified 10 highly polluted beaches along the Bulgarian Black Sea coast, with plastics comprising 84.3% of items found (dominated by cigarette filters, plastic caps, and packaging); 77 of 105 coastal industrial sites in the Black Sea basin have been identified as significant wastewater sources; and the most severe conditions were recorded at Varna Bay and the Kamchia River mouth, and in Burgas Bay. The national monitoring programme currently covers only 5 of the 11 descriptors required under MSFD, a coverage gap that is directly linked to Bulgaria's MSFD compliance procedure before the Court of Justice of the EU.

Bulgaria is the only full member of the Euro-Argo ERIC (Argo float programme) in the Black Sea, providing autonomous underwater profiling observations. IO-BAS Varna maintains the national marine research vessel fleet and participates in JERICO-RI (coastal observatory) and BRIDGE-BS (Black Sea data integration) projects. Bulgaria operates two submarine fibre optic cable systems (KAFOS: Varna–Odessa–Istanbul, 504 km; Caucasus Cable System: Balchik–Poti, capacity 12.6 Tbit/s) — critical for the digital connectivity of the Black Sea basin. The Black Sea participates in the EU Digital Twin of the Ocean (DTO) initiative, in which integrated, interoperable monitoring data is a prerequisite.

Sector	Ocean Monitoring, Data, and Submarine Infrastructure
Maturity	Tier 2 — Emerging (public good sector; research-driven)
GVA (EUR, latest)	Not directly quantified; submarine cable infrastructure: nationally strategic
Employment (FTE)	Not directly quantified; research community at IO-BAS, VMU, BAS institutes
Key Actors / Target Groups	IO-BAS Varna (Institute of Oceanology, BAS) — lead monitoring institution; Euro-Argo ERIC — Bulgaria is Black Sea member; Ministry of Environment and Water (MEW/MOCB) — environmental monitoring mandate; Executive Environment Agency (IAOC) — national environmental data system; Varna and Burgas Regional Inspectorates for Environment and Water (PIOCB); BTC (Bulgarian Telecommunications Company) — KAFOS cable operator; Vivacom — Caucasus Cable System; BRIDGE-BS project consortium; EMODnet (European Marine Observation and Data Network) — Bulgaria participates

Identified Gaps	No Black Sea equivalent of EuroGOOS (coordinated operational oceanography); Bulgaria does not fully participate in EuroGOOS despite Euro-Argo membership; monitoring data fragmented across MOCB, IO-BAS, IAOC, and municipal systems with limited interoperability; no national marine data centre with open-access policy; research vessel capacity insufficient for continuous Black Sea coverage; Digital Twin of the Ocean (DTO) integration requires data quality and format standardisation not yet achieved at national level
Development Outlook and Key Opportunities	Bulgaria's Euro-Argo ERIC membership and IO-BAS research infrastructure represent comparative advantages in the Black Sea basin. The primary development need is institutional: integration of fragmented monitoring data into interoperable national and EU systems (EMODnet, CMEMS, DTO). A national marine data centre with open-access policy would significantly increase the economic and scientific value of existing monitoring investments.

3.3.4 Maritime Infrastructure (Submarine Cables, Pipelines, Coastal Engineering)

Maritime infrastructure in Bulgaria encompasses submarine communications cables, coastal and port engineering works, and maintenance of maritime aids to navigation. As noted above, three submarine fibre optic cable systems traverse Bulgarian Black Sea waters, providing critical digital connectivity for the wider Black Sea basin. The Trans-Balkan Pipeline and associated offshore infrastructure are also relevant subsea assets. Coastal engineering — including beach nourishment, coastal protection works, and dredging — is carried out by BPIC, the Ministry of Regional Development and Public Works (MRDPW, and municipal authorities. Based on orthophoto mapping, 402 coastal protection segments covering a total length of 69.89 km have been identified along the entire Bulgarian coastline, with engineered structures covering approximately 16.2% of the coast. Despite these interventions, approximately 48% of sand beaches remain affected by erosion. Cliff erosion rates vary by geology: 0.30 m/year in the northern loess formations between Cape Sivriburun and Shabla, and 0.22 m/year in the clay formations between Pomorie and Cape Lahna (World Bank 2020, citing Stanchev, Young, and Stancheva 2013). Sea level rise is estimated at 1.5–3 mm/year along the Bulgarian Black Sea coast, and eleven stretches totalling approximately 267 km have been identified as at significant risk of coastal flooding, with Nessebar and Burgas identified as most vulnerable by affected population (World Bank 2020).

Sector	Maritime Infrastructure (Cables, Pipelines, Coastal Engineering)
Maturity	Tier 2 — Emerging (strategically significant; limited sector organisation)
GVA (EUR, latest)	Not separately quantified; included in port activities and ICT sectors
Employment (FTE)	Not separately quantified
Key Actors / Target Groups	BPIC — port infrastructure maintenance and dredging; MRDPW — coastal protection and sea defence works; BTC, Vivacom — submarine cable operators; Bulgartransgaz EAD — gas pipeline infrastructure; Executive Agency for Exploration and Maintenance of the Danube River (EAEMDR); Ministry of Regional Development and Public Works (MRDPW) — coastal management
Identified Gaps	No integrated coastal zone management plan (required under EU ICZM Protocol); coastal erosion accelerating in several municipalities (Shabla, Kavarna, Byala); no standardised environmental baseline for subsea cable routing; limited national capacity for offshore infrastructure inspection and maintenance; coordination between cable operators and MSP authorities not formalised
Development Outlook and Key Opportunities	Coastal erosion management and sea defence are urgent development needs in several municipalities (Shabla, Kavarna, Byala). The submarine cable infrastructure (KAFOS, Caucasus Cable System) is a strategic national asset requiring maintenance investment and MSP protection zoning. Integrated coastal

zone management planning, required under the EU ICZM Protocol, has not yet been implemented.

3.4 Tier 3 — Nascent and Pre-Commercial Sectors

The following sectors are at research, pilot, or pre-commercial stages in Bulgaria. Economic quantification is not available at national level. Their inclusion in this analysis reflects their strategic relevance to the CMA, the SRIA, and BlueDial objectives, and their potential for development through cross-border cooperation. Where information is not available, this is explicitly noted.

Table 3.2. Tier 3 — Nascent Sectors: Status, Actors, and Development Outlook for Bulgaria

Sector	Status in Bulgaria	Key Actors / Institutions	Development Outlook for Bulgaria
Marine Ecosystem Protection and Restoration	Active — 282,000 ha marine Natura 2000 network; 3 marine reserves; MOEW leads; Natura 2000 management plans partially developed	MOEW; RIEW Varna and Burgas; IO-BAS; WWF Bulgaria; National Trust Ecoglobe; MOEW-funded projects	282,000 ha marine Natura 2000 network provides a foundation for marine protected area management. Development priorities: completing Natura 2000 management plans; developing blue carbon accounting for coastal wetlands; scaling up marine litter monitoring and reduction under the MSFD. Regional coordination with Romania and Türkiye on transboundary MPAs is a shared need.
Blue Carbon and Coastal Wetland Habitats	Research stage — Black Sea posidonia (<i>Zostera marina</i>) meadows and coastal wetlands assessed as carbon sinks; no voluntary or compliance carbon market mechanism active. Bulgaria has internationally recognised coastal wetland assets: Atanasovsko Lake (Ramsar, 1983; 1,700 ha), Pomorie Lake (Ramsar, 1995; 1,044 ha), Mandrensko Lake, and Burgas Lake — all designated Natura 2000 sites in the Burgas lake system. No national blue carbon accounting or certification framework exists.	IO-BAS Varna — marine habitat carbon research; MOEW — Ramsar site national authority; Bulgarian Biodiversity Foundation; WWF Bulgaria (Burgas coastal wetland programme); Black Sea NGO Network; Municipalities of Burgas and Pomorie (wetland managers)	Bulgaria's Ramsar-designated coastal wetland complex in the Burgas region (Atanasovsko Lake, Pomorie Lake, Mandrensko Lake, Burgas Lake) represents one of the most significant Blue Carbon assets in the Black Sea basin. In addition, Black Sea posidonia meadows are recognised carbon sinks under the emerging EU Blue Carbon framework. Development priorities: scientific quantification of carbon sequestration capacity at the Burgas Ramsar sites; development of a voluntary blue carbon certification methodology applicable to Bulgarian coastal ecosystems; piloting blue carbon in nature-based solutions and biodiversity offsetting schemes under the EU Nature Restoration Law; and cross-border collaboration with Romania

			(Danube Delta Ramsar site) on shared carbon accounting methodologies.
Waste Management and Pollution Control	Active — marine litter monitoring under MSFD (MOEW); beach litter surveys; no national marine litter reduction plan; port waste reception facilities required under EU Directive 2019/883 (being implemented)	MOEW; EAMA (port waste); regional municipalities; Coastguard; NGOs (Black Sea NGO Network, Zero Waste Alliance Bulgaria); BPIC (port reception facilities)	Port waste reception facilities are being implemented under EU Directive 2019/883. Marine litter monitoring is conducted under the MSFD. Development priorities: a national marine litter reduction action plan; ghost fishing gear retrieval programmes; and regional coordination on riverine plastic input reduction (Danube and coastal rivers).
Seabed Mining	No commercial activity; legislative framework under revision. Historically, sand extraction in Lake Varna (not open sea). No exploration licences for deep-sea minerals in Bulgarian waters.	Ministry of Energy (licensing); Geological Institute BAS (research)	No commercial seabed mining activity exists or is planned in Bulgarian Black Sea waters. The legislative framework is under revision. The primary relevance is MSP: ensuring any future licensing is spatially compatible with fishing grounds, cable corridors, and marine protected areas.
Desalination	No commercial-scale desalination in Bulgaria. Research interest in small-scale desalination for island and remote coastal communities. Pilot studies referenced in EU-funded projects.	Technical University Sofia and Varna (research); water utilities (limited interest)	No commercial desalination activity in Bulgaria. Relevant in the context of climate adaptation planning for water-stressed coastal communities (Shabla, northern coast) and for small island-equivalent infrastructure. Not a current development priority.

3.5 Summary — Sector Mapping Matrix

The sector analysis confirms that Bulgaria's Blue Economy is built primarily on a set of established maritime sectors — maritime transport (shipping, shipbuilding and ship repair, ports and logistics), coastal tourism and marine living resources — which together generate the overwhelming majority of Blue Economy gross value added and employment. Among these, maritime transport, represent some of the country's most strategic and internationally competitive maritime activities, supported by significant infrastructure, industrial capacity, specialised skills, and integration into European and global value chains.

The principal challenge facing these sectors is not their economic relevance, but the need to accelerate technological modernisation, green and digital transition, workforce renewal, and investment in innovation and productivity improvements. At the same time, stronger coordination between industry, research organisations, public authorities, and financing instruments is needed to support their long-term competitiveness and resilience.

Emerging Blue Economy activities, including marine renewable energy, marine biotechnology, ocean observation and monitoring, and other innovation-intensive maritime activities, provide opportunities for future diversification and value creation. Bulgaria possesses important research, engineering, and scientific capabilities in several of these domains, but their development remains constrained by regulatory, financial,

and commercialisation challenges. Their future contribution to the Blue Economy is therefore likely to depend on stronger links between research, innovation, entrepreneurship, and market deployment.

Table 3.3. Bulgaria — Blue Economy Sector Mapping Matrix

Sector	Tier	Development Priority	Key Actors
Fisheries and Aquaculture	1	High	EAFA, fishers' associations, mussel farms, MCB
Coastal and Maritime Tourism	1	High	Ministry of Tourism, coastal municipalities, tourism enterprises
Maritime Transport (Black Sea)	1	High	EAMA, ship owners' association, Naval Academy
Inland Waterway Transport (Danube)	1	High	EAEMDR, MTC, Danube port operators (Vidin, Lom, Ruse, Silistra)
Port Activities and Logistics	1	High	BPIC, Port Varna EAD, Port Burgas EAD
Shipbuilding and Ship Repair	1	High	Bulyard, MTG Dolphin, Odessos Shiprepair Yard, TEREM–KRZ Flotski Arsenal, KRZ Port Burgas, BNAKK
Marine Non-Living Resources	1	Low	Ministry of Energy, Chernomorski Solnitsi
Marine Renewable Energy	2	High	Ministry of Energy, MRDPW (MSP), BWEA
Marine Biotechnology	2	High	IO-BAS, VMU, biotech SMEs, MCB
Ocean Monitoring and Data	2	Medium	IO-BAS, MOEW, ExEA, Euro-Argo ERIC
Maritime Infrastructure	2	Medium	BPIC, MRDPW, cable operators
Marine Ecosystem Protection	3	High	MOEW, RIEW, IO-BAS, WWF Bulgaria
Blue Carbon / Coastal Wetland Habitats	3	Medium	IO-BAS, MOEW, Burgas/Pomorie municipalities, WWF Bulgaria
Waste Management / Pollution	3	High	MOEW, EAMA, coastal municipalities, NGOs
Seabed Mining	3	Low	Ministry of Energy (monitoring only)
Desalination	3	Low	Technical universities (research only)

The sector and target group analysis presented in this section, combined with the institutional mapping (Section 1), strategic framework (Section 2), and funding landscape (Section 4), provides the complete analytical baseline of Deliverable D.1.1. These findings will be validated, enriched, and cross-referenced against primary data collected through stakeholder consultations, the results of which are presented in Section 5. Section 6 will synthesise findings across all dimensions to identify strategic priorities and recommendations for Blue Economy development in the Black Sea region.

Section 4. Funding Instruments for the Blue Economy in Bulgaria

Bulgaria's Blue Economy funding is characterised by a high degree of EU dependency and fragmented programme management across multiple sectoral operational programmes. The absence of a national Blue Economy strategy — identified in Section 2 as the central governance gap — means that no single authority coordinates cross-sectoral investment prioritisation. Funding flows to individual sectors through separate managing authorities, limiting coherence and strategic targeting.

4.1 National and Nationally Managed Funding Programmes

Bulgaria does not operate a dedicated national funding programme covering the full spectrum of Blue Economy sectors. Instead, Blue Economy development is supported through a portfolio of EU-funded programmes implemented and managed at national level, complemented by national co-financing and direct sectoral public investment. Sectoral ministries — in particular the Ministry of Transport and Communications (MTC), through the Bulgarian Ports Infrastructure Company (BPIC), and the Ministry of Agriculture and Food (MAF), through the Executive Agency for Fisheries and Aquaculture (EAFA) — administer direct state allocations to their respective Blue Economy sub-sectors, covering regulatory infrastructure, inspection and control, monitoring, and national co-financing of EU programme implementation; specific annual budget figures for these Blue Economy sub-components are not publicly disaggregated and were not available for this analysis. Together, the programmes presented in this section support business competitiveness, research and innovation, skills development, transport connectivity, environmental protection, territorial development, fisheries and aquaculture, and the green and digital transition. Most combine EU resources with national co-financing and are accessible to a wide range of public and private stakeholders relevant to the Blue Economy. **There is no funding instrument on national level specifically targeting the development of Blue Economy.**

4.2.1 Programme "Competitiveness and Innovation in Enterprises" (PCIE) 2021–2027

Managed by the Ministry of Innovation and Digital Transformation and financed through the ERDF and national co-financing, PCIE is one of the most important programmes for Blue Economy enterprises. It supports SME competitiveness, innovation, digitalisation, energy efficiency, industrial modernisation, circular economy solutions, and business growth. Relevant beneficiaries include maritime manufacturing companies, shipbuilding and ship repair supply chains, port-related services, marine technology providers, fisheries and aquaculture value chains, and coastal tourism enterprises.

4.2.2 Programme "Research, Innovation and Digitalisation for Smart Transformation" (RIDST) 2021–2027

RIDST supports research infrastructures, technology transfer, science-business collaboration, digitalisation, and innovation ecosystems. It is particularly relevant for marine science, ocean observation, marine technologies, maritime digitalisation, biotechnology, and Blue Economy innovation. Potential beneficiaries include universities, research organisations, innovation clusters, Digital Innovation Hubs, SMEs, and research-business partnerships.

4.2.3 Programme "Education" 2021–2027 and Programme "Human Resources Development" (HRD) 2021–2027

These ESF+ programmes provide support for education, vocational training, lifelong learning, workforce development, reskilling, and upskilling. They are particularly relevant for addressing skills shortages in maritime transport, shipbuilding, fisheries, aquaculture, coastal tourism, and emerging Blue Economy sectors. Beneficiaries include schools, universities, VET providers, training organisations, employers, and employees.

4.2.4 Programme "Environment" 2021–2027

The Programme Environment supports biodiversity conservation, ecosystem restoration, climate adaptation, pollution prevention, and environmental monitoring. For the Blue Economy, it provides important financing opportunities related to marine biodiversity, coastal ecosystems, water quality, climate resilience, and environmental governance. Beneficiaries include public authorities, municipalities, environmental agencies, research organisations, NGOs, and protected area managers.

4.2.5 Programme "Regional Development" 2021–2027

The **Programme for Regional Development 2021–2027** is Bulgaria's main instrument for supporting regional and local development. It is managed by the **Ministry of Regional Development and Public Works** and is co-financed by the **European Regional Development Fund (ERDF)** and the **Cohesion Fund**. The programme finances investments aimed at improving economic competitiveness, urban development, tourism, innovation, environmental sustainability, and public infrastructure.

For the Blue Economy, the programme is particularly important because it provides funding directly to municipalities and regional partnerships for projects related to coastal tourism, waterfront regeneration, sustainable urban development, innovation ecosystems, environmental protection, climate resilience, and the valorisation of maritime and cultural heritage.

A key feature of the programme is the use of **Integrated Territorial Investments (ITI)**, which allow groups of complementary projects to be financed through a single territorial development approach. ITIs are implemented through **Municipal Integrated Development Plans (MIDPs)** and **Integrated Territorial Strategies (ITS)**, enabling municipalities, businesses, universities, research organisations, NGOs, and other stakeholders to jointly address local development challenges. Blue Economy activities are eligible under several programme priorities, particularly those supporting economic development, tourism, innovation, environmental sustainability, and regional competitiveness.

In the Black Sea region, the programme plays a key role in financing the development priorities of **Varna** and **Burgas**, including sustainable tourism infrastructure, urban waterfront regeneration, innovation and entrepreneurship support, environmental improvements, climate adaptation measures, and cultural and maritime heritage projects. The programme therefore represents one of the most important sources of EU funding for municipalities seeking to translate Blue Economy strategies into concrete local investments.

4.2.6 Programme "Transport Connectivity" 2021–2027

The **Programme for Transport Connectivity 2021–2027** is Bulgaria's main national instrument for financing transport infrastructure and mobility projects. It is managed by the **Ministry of**

Transport and Communications and is co-financed by the **European Regional Development Fund (ERDF)** and the **Cohesion Fund**, with a total budget of approximately **EUR 1.9 billion**.

For the Blue Economy, the programme is particularly important for the modernisation, digitalisation and decarbonisation of port infrastructure. It complements the Connecting Europe Facility (CEF) by supporting investments that are not limited to the TEN-T Core Network and by financing operational equipment and infrastructure upgrades that are generally not eligible under CEF.

The most relevant intervention is **Priority 3 – Improving Intermodality, Modernised Traffic Management, and Transport Security and Safety**, with a budget of over **EUR 403 million**. It supports investments in port infrastructure, intermodal terminals, rail-port connectivity, alternative fuel infrastructure, vessel traffic management systems, navigation safety, and low-emission transport solutions. Eligible beneficiaries include the Bulgarian Ports Infrastructure Company (BPIC), port operators, intermodal terminal operators, and other transport infrastructure entities.

In the maritime sector, the programme finances the modernisation of ports, the acquisition of specialised vessels for dredging, navigation marking, search and rescue, and pollution response, as well as digital traffic management systems and alternative fuel supply infrastructure. These investments contribute directly to the implementation of EU transport and maritime decarbonisation policies, including FuelEU Maritime and the EU Sustainable and Smart Mobility Strategy.

A notable example is the project implemented by Port of Varna EAD for the purchase of zero-emission cargo-handling equipment and the rehabilitation of railway infrastructure within the port area. The project supports both the decarbonisation of port operations and the strengthening of intermodal transport connections. For the Port of Varna, which has more limited access to CEF funding than Burgas, the Programme for Transport Connectivity represents one of the most important EU co-financing instruments during the 2021–2027 period.

4.2.7 Programme for Maritime Affairs, Fisheries and Aquaculture (PMFA) 2021–2027

PMFA, financed through EMFAF and national co-financing and managed by the Ministry of Agriculture and Food (MAF) through the Executive Agency for Fisheries and Aquaculture (EAFA), remains the principal sector-specific funding instrument for fisheries, aquaculture, seafood processing, coastal communities, Fisheries Local Action Groups (FLAGs), and Blue Economy diversification. While highly important for fisheries-dependent sectors, it represents only one component of the broader Blue Economy funding landscape. The programme supports fisheries and aquaculture enterprises, producer organisations, research organisations, public authorities, and local fisheries partnerships.

4.2.8 Recovery and Resilience Plan (RRP)

The Recovery and Resilience Plan provides additional, time-limited support (grants financed by EU RRF borrowing, with a 2026 implementation deadline) for the green and digital transition, innovation, research infrastructure, energy efficiency, renewable energy, sustainable transport, and business competitiveness. For the Blue Economy, it has contributed to investments in port digitalisation, green port infrastructure, and sustainable coastal tourism. Its contribution to the structural development of Bulgaria's Blue Economy is limited by its timeline and by the absence of sector-specific strategic targeting; the Burgas Blue Growth Strategy 2024–2030 nonetheless identifies the RRF as a potential source for short-to-medium term support of marine biotechnology and offshore renewable energy activities.

4.3 EU Programmes

In contrast to the nationally managed programmes presented in Section 4.2, this section covers EU instruments that are managed centrally by the European Commission and its executive agencies, or delivered through competitive calls open directly to Bulgarian applicants. These instruments are particularly relevant to ports, shipbuilding and maritime industries, marine research organisations, municipalities, innovation ecosystems, environmental organisations, and Blue Economy SMEs.

4.3.1 Connecting Europe Facility (CEF)

The Connecting Europe Facility (CEF) is the European Union's principal instrument for financing transport infrastructure within the Trans-European Transport Network (TEN-T). For Bulgaria's Blue Economy, CEF is particularly relevant for investments in port infrastructure, multimodal transport connections, rail accessibility, digitalisation, alternative fuel infrastructure, and port decarbonisation. The programme supports both the Port of Burgas, which is part of the TEN-T Core Network, and the Port of Varna, which is included in the TEN-T Comprehensive Network.

CEF has been a major source of investment for the modernisation of Bulgaria's maritime transport infrastructure. Projects supported under the programme have focused on increasing port capacity, improving rail-port connectivity, enhancing multimodal freight transport, and supporting the transition towards low-emission port operations. Notable examples include the REBIRTH28 project at Burgas Port, which delivered a new deep-water berth, upgraded rail infrastructure and shore-side electricity supply, and the FE2WC project, which strengthened rail connectivity between port terminals and the national rail network. Together, these investments have improved the competitiveness and connectivity of Bulgaria's main maritime gateway within European transport corridors.

Looking ahead, CEF remains one of the most important funding sources for strategic investments in Bulgarian ports, including onshore power supply (OPS), alternative fuel bunkering infrastructure, smart port technologies, vessel traffic management systems, and other measures required under the EU's maritime decarbonisation agenda. As the implementation of FuelEU Maritime, EU ETS and revised TEN-T requirements progresses, CEF is expected to play a central role in supporting the green and digital transition of both the Varna and Burgas port systems.

4.3.2 Horizon Europe — Mission 'Restore our Ocean and Waters by 2030'

Horizon Europe is the European Union's flagship research and innovation programme for 2021–2027, with a total budget of EUR 95.5 billion. It is the main source of competitive funding for research, innovation, demonstration and pilot projects relevant to the Blue Economy.

Blue Economy stakeholders can access funding primarily through **Cluster 5 (Climate, Energy and Mobility)** and **Cluster 6 (Food, Bioeconomy, Natural Resources, Agriculture and Environment)**, as well as through the EU Mission *Restore our Ocean and Waters by 2030*. Eligible activities include marine and maritime research, sustainable fisheries and aquaculture, marine biotechnology, ocean observation and monitoring, digitalisation, coastal resilience, ecosystem restoration, circular economy solutions, maritime decarbonisation, renewable energy, and smart port technologies.

The programme is open to universities, research organisations, public authorities, clusters, NGOs and businesses, typically through international consortia. Bulgaria has an active scientific community participating in Horizon Europe projects, particularly through the Institute of

Oceanology – BAS, the Nikola Vaptsarov Naval Academy, Technical University Varna and other research institutions. Increasing the participation of Bulgarian organisations as project coordinators remains an important opportunity for strengthening national research and innovation capacity.

Horizon Europe is complemented by the Sustainable Blue Economy Partnership (SBEP) and Mission Ocean initiatives, which provide additional opportunities for Bulgarian organisations to participate in transnational projects addressing Digital Twins of the Ocean, marine biodiversity, blue bioresources, resilient coastal communities, blue economy governance and circular blue economy solutions.

According to statistics, presented by CINEA, until June 2025, Bulgaria has participated in the following blue economy related projects under **Cluster 5 Horizon**:

⇒ **Cluster 5 Horizon pillar II: Supporting the transition to sustainable, secure and efficient energy.**

BG has participated in 66 projects representing 32,683,441€ of EU contribution of which related to blue economy:

- *Innovation on **floating wind energy** deployment optimized for deep waters and different sea basins (Mediterranean Sea, Black Sea, Baltic Sea, North-east Atlantic Ocean)*
- ***Smart Cities and Communities** lighthouse projects*
- ***Next generation of renewable energy** technologies*

⇒ **Cluster 5 Horizon pillar II: Developing solutions and services for clean, competitive, safe, smart and resilient transport and mobility.**

BG has participated in 29 projects representing 6,329,171€ of EU contribution of which related to blue economy:

- *The Autonomous Ship*
- *Decarbonising long distance shipping*
- *System modelling and life-cycle cost optimisation for waterborne assets*

⇒ **Cluster 5 Horizon pillar II: mitigation and adaptation Horizon Mission Ocean (BG):**

- *Danube river basin lighthouse – 9 projects: 4 046 526€*
- *European Blue Parks – 2 projects: 841392,5€*
- *Community-led actions to restore our ocean, seas and waters – 1 project: 245.625€*
- *Support for the Coalition of waterfront cities, regions and islands for Mission Ocean and Waters 1 61.875*
- *Choose your fish: a campaign for responsible consumption of products from the sea 1 13.313*

4.3.3 Interreg NEXT Black Sea Basin 2021–2027

Interreg NEXT Black Sea Basin 2021–2027 is the primary transboundary cooperation instrument for the Black Sea region, co-financed by the ERDF and the European Neighborhood Instrument (ENI) for non-EU partner countries (Georgia, Moldova, Ukraine, Armenia, Azerbaijan). Bulgaria is

an EU partner country and participates in all priorities. The programme addresses: sustainable Blue and Smart Region development (Priority 1); Clean and Green Region (Priority 2); and Better Governance and Cooperation (Priority 3).

Priority 1 (Blue and Smart Region) is of direct relevance to Bulgaria's blue economy: it supports research and innovation for the Blue Economy, digital transformation of maritime sectors, and sustainable use of marine resources. Priority 2 (Clean and Green Region) addresses marine pollution (marine litter, plastics, nutrients), climate adaptation in coastal areas, and biodiversity conservation — areas of identified need in the Black Sea basin.

For Bulgarian Blue Economy actors, Interreg NEXT Black Sea Basin is a uniquely valuable instrument because it enables cooperation with the non-EU Black Sea states (Georgia, Ukraine, Moldova) that are not eligible for standard ERDF or Horizon Europe cooperation. This is particularly relevant for shared Black Sea challenges: fisheries stock management (GFCM), marine pollution from the Danube basin, transboundary Marine Protected Areas (MPAs), and the development of a common regional vision for a sustainable Blue Economy — the core objective of the Common Maritime Agenda (CMA) for the Black Sea.

4.3.4 LIFE Programme

The LIFE Programme (2021–2027) supports environmental and climate action with a total budget of EUR 5.43 billion. It is centrally managed by the European Climate, Infrastructure and Environment Executive Agency (CINEA) and operates through four sub-programmes: Nature and Biodiversity; Circular Economy and Quality of Life; Climate Change Mitigation and Adaptation; and Clean Energy Transition. All four sub-programmes include calls relevant to Bulgaria's Blue Economy, with open calls confirmed for 2026.

For Bulgaria's coastal zone, the most directly relevant sub-programmes are Nature and Biodiversity and Climate Change Mitigation and Adaptation. Under Nature and Biodiversity, LIFE funds conservation and management of Natura 2000 marine and coastal habitats, species recovery plans, and biodiversity restoration measures. Bulgaria's Black Sea coast contains several Natura 2000 sites, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) designating marine and coastal habitats for which LIFE is an eligible funding source. Under Climate Change Mitigation and Adaptation, LIFE supports coastal resilience measures, nature-based solutions for flood and erosion risk, and blue carbon ecosystem management — all identified as priority needs in the analysis of Bulgaria's Black Sea coastal municipalities in Section 2.

LIFE 2026 calls open across all four sub-programmes, including a two-stage call for Strategic Integrated Projects (SIPs) under Nature and Biodiversity (LIFE-2026-STRAT-ENV-SIP), which can leverage co-financing from EU structural funds, Horizon Europe, and national programmes. Bulgarian environmental NGOs, municipal administrations, and research institutions have participated as partners in LIFE projects, though project coordination from Bulgarian lead applicants remains limited. A persistent constraint is the requirement for substantial co-financing and institutional capacity to manage multi-year LIFE projects, which limits access particularly for smaller coastal municipalities.

4.3.5 Innovation Fund

The EU Innovation Fund, funded by revenues from the EU Emissions Trading System (ETS), supports large-scale demonstration of innovative low-carbon technologies. For Bulgaria's Blue Economy, it is relevant for offshore renewable energy demonstration projects (pending resolution of the RESA designation gap) and for low-carbon port technology pilots. Access is through

centrally managed competitive calls (CINEA). Bulgarian maritime actors have limited track record in this instrument, and dedicated investment readiness support for the Innovation Fund is not available at national level.

4.3.6 Interregional Innovation Investments (I3)

The **Interregional Innovation Investments (I3) Instrument** is an EU funding programme managed by the European Commission (DG REGIO) that supports the commercialisation and scale-up of innovative solutions through cooperation between regions with shared smart specialisation priorities. The programme aims to strengthen interregional value chains, accelerate market uptake of innovation, and improve the innovation capacity of less-developed regions.

For the Blue Economy, the I3 Instrument offers opportunities to support innovation and investment projects in areas such as sustainable fisheries and aquaculture, marine biotechnology, maritime technologies, renewable energy, circular economy solutions, and digital technologies for maritime and coastal sectors. The programme is particularly relevant for SMEs, clusters, research organisations, innovation centres, public authorities and other actors participating in interregional innovation ecosystems.

The instrument supports both investment-oriented projects and capacity-building activities, including the development of regional innovation ecosystems, cross-border business collaboration, demonstration activities, and the integration of SMEs into European value chains. This makes it particularly suitable for emerging Blue Economy sectors that require cooperation between industry, research organisations and public authorities across different European regions.

4.3.7 EIT Water — Emerging Knowledge and Innovation Community

The European Institute of Innovation and Technology (EIT) operates a network of Knowledge and Innovation Communities (KICs) — public-private partnerships that support innovation, entrepreneurship, and education within defined thematic challenge areas. EIT Water is the KIC with a confirmed institutional role specific to Bulgaria's Blue Economy.

EIT Water is the EIT's tenth KIC, formally launched in November 2025 under the coordination of Aarhus University (the consortium includes 50 partners from 24 countries, including universities, ports, industry, SMEs, and NGOs), adopting an integrated approach across freshwater, marine, and maritime environments. Its three priority challenge areas — (1) water scarcity, drought, and floods; (2) marine and freshwater ecosystem degradation; and (3) the development of a circular and sustainable Blue Economy — map directly onto Bulgaria's Black Sea coastal needs, particularly coastal water quality, marine ecosystem restoration, and sustainable blue business development. EIT Water is currently in its launch phase (EIT startup grant of up to EUR 5 million for 2026), with open calls expected once the KIC is fully operational in 2027 — representing a post-2027 opportunity rather than a current funding source. MCB serves as the EIT Water Black Sea Regional Hub.

4.4 International Finance and Private Investment

4.4.1 BlueInvest and EIF / EIB Group

BlueInvest is the European Commission's investment platform for the Blue Economy, operated by DG MARE and funded through EMFAF. Since its launch in 2019, BlueInvest has supported 430 technical and financial assistance beneficiaries, facilitated 92 companies in securing investment, and enabled a total of EUR 532 million in disclosed investment raised across 36 countries (European Commission, DG MARE, 2026). The platform is explicitly open to Bulgarian

stakeholders and provides investment readiness support, matchmaking with the European Investment Fund (EIF), and access to EU co-investment instruments through InvestEU. However, the BlueInvest Investor Report 2026 does not identify any Bulgarian company among the portfolio of companies that have secured investment, nor does it record Bulgaria among the most investor-attractive countries for blue economy finance — a ranking dominated by France, the Netherlands, and Spain. This absence reflects the early-stage character of Bulgaria's blue economy investment ecosystem rather than any formal ineligibility.

The BlueInvest Investor Report 2026 explicitly notes, in its assessment of the aquaculture and marine food sector, that: 'In regions such as South-East Europe and the Black Sea, access to finance has improved compared to a decade ago, but sustained support remains necessary for risk-heavy innovations' (European Commission, DG MARE, 2026, p. 67). This assessment applies equally to other blue economy sub-sectors active in the Black Sea basin and confirms that the gap between EU-level instrument availability and effective access at national level remains a structural challenge for Bulgaria.

The European Investment Fund (EIF) currently supports 10 dedicated Blue Economy funds as a Limited Partner (LP), providing anchor capital that enables private fund managers to raise additional capital from institutional investors. The EIB Group offers two specific instruments for maritime green transition: the Clean Shipping Guarantee Programme (credit guarantees for LNG and hydrogen vessel finance) and the Clean Shipping Loan Programme (direct loans for vessel decarbonisation). Both are available to Bulgarian shipping and shipbuilding companies, though awareness and take-up at national level is limited.

The World Bank has been cited in the Burgas Blue Growth Strategy as a potential partner for a future Black Sea marine pollution and marine litter programme covering Bulgaria alongside other riparian states. No specific World Bank programme for Bulgaria's Blue Economy is currently active.

4.4.2 Private Venture Capital and Private Equity

The European private investment market for the Blue Economy has grown substantially: total assets under management (AuM) by funds with a clear Blue Economy interest stands at approximately EUR 11 billion across 159 identified funds — comprising 105 venture capital, 29 corporate venture capital, and 25 private equity funds — with up to EUR 20 billion in partially exposed capital (BlueInvest Investor Report 2026, DG MARE). Fully dedicated blue VC funds average EUR 92.8 million in AuM. The dominant investment stage is pre-Series A to Series B, with exit markets still underdeveloped.

Bulgaria's presence in this European ecosystem is minimal. The BlueInvest Investor Report 2026 maps 159 funds across Europe by headquarters location; only two funds are identified with a Bulgarian headquarters — one with full blue economy exposure and one with partial exposure. By comparison, France accounts for 22 funds, the Netherlands for 13, and the United Kingdom for 12. Bulgaria is not listed among the countries investors consider most attractive for blue economy investment, a group that includes France (49%), the Netherlands (49%), Spain (26%), and Denmark (18%). The geographic concentration of private blue capital in Western and Northern Europe is a structural barrier to access for Bulgarian blue economy ventures seeking equity finance.

For Bulgarian Blue Economy companies, engagement with this capital market requires prior investment readiness development. The Bulgarian start-up ecosystem in blue economy sectors — marine biotechnology, ocean monitoring, maritime digital services — is at an early stage, with few companies meeting the due diligence criteria of European blue funds. Programmes such as

BlueInvest's Technical and Financial Assistance and Horizon Europe's European Innovation Council (EIC) represent the primary available pathways to build investment readiness before engaging private VC or PE capital.

4.4.3 Blue Finance Instruments — Blue Bonds and Public-Private Partnerships

Blue bonds — debt instruments whose proceeds are earmarked for sustainable ocean and coastal projects — are referenced in the EU Blue Economy investment landscape as an emerging instrument, but have not yet been deployed in Bulgaria. Their applicability in the Bulgarian context is limited by: the absence of a national sovereign blue bond framework; the small scale of the domestic capital market; and the limited pipeline of large-scale, investment-grade blue infrastructure projects outside the port sector.

Public-private partnerships (PPPs) are identified as a funding source in the Burgas Blue Growth Strategy 2024–2030 action plan alongside EU structural funds, international financial institution loans, and bilateral donor programmes. In practice, Blue Economy PPPs in Bulgaria remain limited: the most developed example is the concession model for beach facilities and small marina operations. Large-scale PPPs for port expansion, offshore renewable energy, or marine research infrastructure have not yet been implemented.

4.5 Accessibility and Effectiveness of Funding Instruments

4.5.1 Barriers to Access

Multiple categories of barriers limit the effective utilisation of available funding instruments by Bulgarian Blue Economy actors. These barriers operate at different levels of the governance and private sector ecosystem:

- Administrative burden and bureaucratic complexity: identified in the Burgas Blue Growth Strategy as a primary constraint for both the private sector and research institutions accessing equipment, technology, and state support. Bureaucratic barriers are cited alongside weak investment certainty as the two main institutional disincentives to Blue Economy private investment in Bulgaria.
- Limited investment readiness at SME level: the primary bottleneck for EMFAF, BlueInvest, and Horizon Europe access is not the absence of instruments but the limited capacity of Bulgarian Blue Economy SMEs to develop bankable project proposals. The DBAN assessment explicitly identifies this as Bulgaria's principal funding mobilisation constraint.
- Limited private sector liquidity and banking finance: the Burgas Blue Growth Strategy SWOT identifies 'reduced liquidity in the private sector and limited financing from the banking system' as a structural threat. Commercial bank lending to Blue Economy innovation sectors is very limited in Bulgaria; risk appetite is low for pre-commercial or early-stage marine technology ventures.
- Fragmented programme management: six or more managing authorities administer EU funds relevant to the Blue Economy (MRDPW for PRD; Ministry of Agriculture and Food for EMFAF; MOEW for environment; MLSP for ESF+; MTC for transport; CINEA/EC centrally for Horizon Europe, CEF2, Innovation Fund). There is no inter-ministerial coordination mechanism to ensure coherent allocation of these instruments to Blue Economy priorities.
- There is no funding cross-sectoral support mechanism at national level, specifically targeting the Blue Economy.
- Workforce skills deficit: brain drain and the absence of qualified personnel in key maritime sectors is explicitly identified as a structural threat to Blue Economy development. Skills gaps are particularly acute in alternative fuel systems, marine digital technologies, offshore energy,

and blue biotechnology — exactly the sectors where EU funding instruments offer the most growth potential.

4.5.2 Gaps in Funding Coverage

Analysis of available instruments against the Blue Economy sector profiles developed in Section 3 reveals the following structural gaps in funding coverage:

Table 4.2. Funding Coverage Gaps by Blue Economy Sector

Sector	Available Instruments	Coverage Gap
Fisheries and aquaculture	EMFAF/ 2021–2027 (primary; 8 procedures planned for 2026, EUR ~17M), incl. BG14MFPR001-2.009 'Productive Investments and Innovations in Aquaculture' (EUR 10.2M; indicative launch May 2026; grants 60% SMEs / 50% non-SMEs); Priority 4 marine habitat/MPA fishing activity plans (2026 pipeline); FLAG; PRD; LIFE	Processing and marketing investments remain only partially covered by EMFAF allocations; no dedicated national co-financing scheme to complement EMFAF for operators below the SME threshold; limited technical assistance capacity for preparing bankable aquaculture investment projects at local level
Coastal and maritime tourism	PRD / MIDP Priorities 1, 4; CEF2 (cruise port expansion)	No national tourism innovation fund; Action Plan for National Tourism Strategy 2014–2030 expired July 2021; no cross-border nautical tourism fund
Maritime transport	CEF2 (limited); Innovation Fund; EIB Clean Shipping programmes	No national decarbonisation support scheme for Bulgarian-flagged vessels; EU ETS compliance cost uncompensated for SME operators
Port activities	CEF2 (Burgas core TEN-T); Innovation Fund; EMFAF blue ports	Varna (TEN-T comprehensive only) has lower CEF2 priority; no dedicated OPS/shore power national co-financing scheme
Shipbuilding and ship repair	PRD (SME support); EIB Clean Shipping Guarantee	No dedicated green retrofit support programme; limited R&D collaboration funding for yards and universities
Marine renewable energy	Innovation Fund; InvestEU; Horizon Europe	All instruments require regulatory precondition (zone designation under LRES) that has not been met; no national co-financing scheme for offshore wind feasibility
Marine biotechnology	Horizon Europe; EMFAF blue biotech; BlueInvest; Black Sea Accelerator	No national research-to-market programme; no dedicated national marine biobank or shared infrastructure fund
Ocean monitoring and data	Horizon Europe; EMFAF; Interreg NEXT Black Sea; LIFE	No national marine data centre co-financing; limited operational oceanography budget in MOEW and IO-BAS annual allocations
Marine ecosystem protection	LIFE; EMFAF; PPP (green ecosystems priority); Cohesion Fund	Natura 2000 management plan implementation underfunded; no marine litter national action plan with dedicated budget

Overall Funding Gap Assessment

Bulgaria's Blue Economy benefits from access to a diverse portfolio of European and national funding instruments supporting business competitiveness, research and innovation, skills development, transport connectivity, environmental protection, territorial development, fisheries and aquaculture, and the green and digital transition. Collectively, these programmes provide significant opportunities for Blue Economy stakeholders across established sectors such as

maritime transport (shipping, shipbuilding and ship repair, ports and logistics) tourism, fisheries, and aquaculture, as well as emerging areas including marine technologies, marine renewable energy, biotechnology, and ocean observation.

The analysis indicates that the main opportunity lies in strengthening the strategic coordination and mobilisation of existing funding instruments. Areas with potential include the development of integrated Blue Economy investment pipelines, stronger support for innovation commercialisation and research-to-market pathways, enhanced investment readiness of SMEs and start-ups, and improved access to funding for emerging Blue Economy activities. Continued efforts to strengthen governance, stakeholder cooperation, project development capacity, and alignment between funding programmes and strategic priorities would help maximise the impact of the resources already available to support sustainable Blue Economy development in Bulgaria.

The establishment of innovation funding mechanism at national level, specifically targeting the Blue Economy SMEs would help overcome the barriers in access to funding to Bulgarian BE innovative companies with high growth potential.

4.5.3 Outlook: The 2028–2034 Multiannual Financial Framework

The funding architecture described in this section reflects the 2021–2027 programming period. In July 2025, the European Commission proposed a substantially restructured EU budget for 2028–2034 (European Commission, 2025), currently under negotiation between the European Parliament and the Council and expected to be finalised during 2026–2027. Three elements of the proposal are of direct relevance to Bulgaria’s Blue Economy funding landscape. First, a new European Competitiveness Fund (ECF), proposed at around EUR 409 billion, would consolidate Horizon Europe with a range of programmes supporting the green and digital transition, biotechnology, defence, security and space — bringing together, under a single instrument, much of the research and innovation funding on which Bulgaria’s emerging Blue Economy sectors (marine renewable energy, marine biotechnology, ocean monitoring) currently rely on programmes like Horizon Europe, the Innovation Fund, etc. (Section 4.3). Second, EMFAF and other shared-management funds, including the ERDF-based programmes described in Section 4.2, would be merged into a single European Fund delivered through country-specific National and Regional Partnership Plans negotiated directly between the Commission and Member States, replacing the current landscape of separate operational programmes. Third, Interreg — including Interreg NEXT Black Sea Basin (Section 4.3.3) — would retain a distinct, dedicated envelope of around EUR 10 billion rather than being absorbed into either the ECF or the National and Regional Partnership Plans, preserving territorial and cross-border cooperation as a separate funding track. As these proposals are still under negotiation, the precise design of successor instruments and Bulgaria’s allocation under them cannot yet be determined; Blue Economy stakeholders should nonetheless begin tracking this transition now, so that Blue Economy and Black Sea priorities are reflected in the national programming choices and partnership plans to be negotiated ahead of 2028.

Section 5. Stakeholder Consultation Results

This section presents the results of a structured stakeholder consultation conducted by Marine Cluster Bulgaria as part of Activity 1.1 of the BlueDial project, complementing the desk-based institutional, legal, and sectoral mapping presented in Sections 1 to 4. The consultation was

designed to capture the perceptions, experiences, and recommendations of national, regional, and local actors directly engaged in Bulgaria's Blue Economy, providing an evidence base against which the desk-research findings of this report can be validated and enriched.

5.1 Methodology and Respondent Profile

Data collection was carried out using a structured questionnaire, “State of the Art of the Blue Economy (BE) Framework,” developed for the BlueDial project and administered through the European Commission's EUSurvey platform. The questionnaire was organised into six thematic sections: (1) respondent and institutional profiling; (2) legal and strategic framework; (3) institutional framework and cooperation; (4) funding instruments; (5) business environment; and (6) potentials, gaps, and recommendations. It combined closed questions (single- and multiple-choice, and five-point Likert-scale ratings) with open-ended questions, allowing both quantitative comparison and qualitative depth. The questionnaire was translated in Bulgarian and distributed to national, regional, and local public institutions, academic and research organisations, businesses, industry associations, and civil society organisations engaged in Bulgaria's Blue Economy. Outreach was carried out in two complementary ways: 58 questionnaires were sent directly to identified institutions by e-mail and by official letter, and the target audience was additionally reached through a Blue Economy stakeholders' event organised by Marine Cluster Bulgaria.

A total of 27 valid responses were received and form the empirical basis for this section. Where a respondent did not answer a given question, the missing value is excluded from the corresponding calculation and the applicable sample size (n) is reported.



Source: BlueDial stakeholder consultation survey, Bulgaria, 2026 (n = 27).

Figure 5.1. Respondent Profile by Organisation Type (n = 27).

National administrations and ministries represent the largest respondent group (9 of 27, 33%), reflecting the cross-sectoral distribution of Blue Economy competences described in Section 1. Businesses and private enterprises (6, 22%) and academic/research organisations (5, 19%) form the second and third largest groups, followed by NGOs and civil society organisations (3, 11%), local and municipal administrations (2, 7%), and one respondent each from a state-owned enterprise and an industry association/cluster.

In terms of sectoral engagement, respondents most frequently identified with maritime transport, shipbuilding/ship repair, ports and logistics (14 of 27 respondents), ocean monitoring and marine data (11), waste management and pollution control (10), maritime security and surveillance (7),

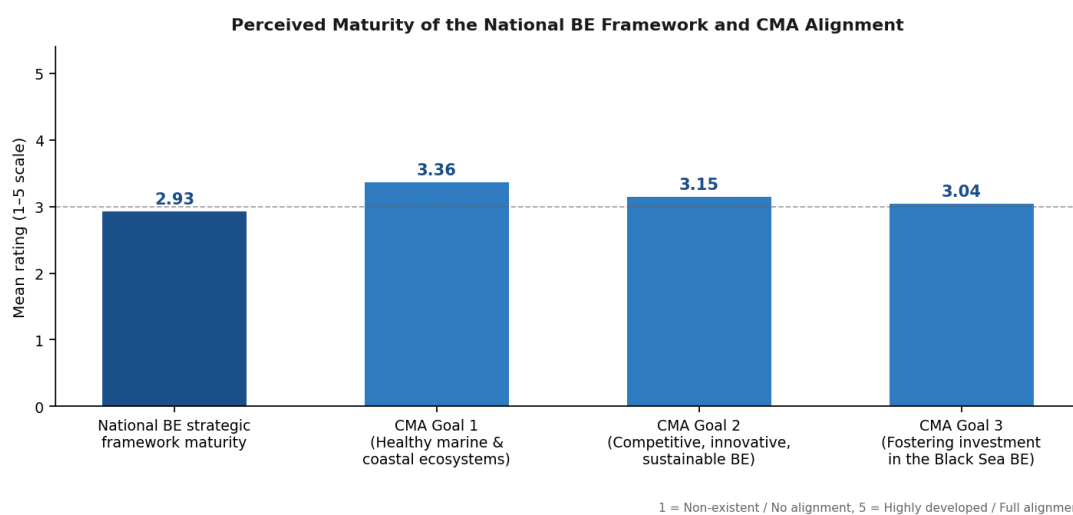
and marine ecosystem protection and restoration (6). Emerging sectors were markedly less represented among respondents' primary fields of engagement: marine biotechnology (2) and marine renewable energy (1). This distribution mirrors the established-versus-emerging sector divide identified in Section 3 and should be considered when interpreting the sector-specific findings presented below.

5.2 Perceptions of the Strategic and Legal Framework

Respondents rated the maturity of Bulgaria's national strategic framework for the Blue Economy at a mean of 2.93 on a five-point scale (1 = non-existent, 5 = highly developed and integrated; n = 27), indicating a framework perceived as partially developed at best.

These ratings are supported by open question, providing a better overview on the drivers and constraints to establishing a common BE vision and strategy. Regarding the strategic framework, holistic approach should be applied in the policies related to the sea, integrating the blue economy principles into the national strategic and legislation framework. Focus is placed on the need of better coordination between the different BE sectors, between the business and administration as well as between the different levels of government and between the institutions, related to BE. Other important aspects include: building of administrative and technical capacity in combination with funding mechanisms, targeted at the development of BE. One of the barriers worth mentioning is the unstable political environment which leads to inconsistencies in the implementation of policies, measures and strategic processes and projects (e.g. related to maritime transport).

Alignment with the three goals of the Common Maritime Agenda (CMA) for the Black Sea was rated somewhat higher: 3.36 for Goal 1 (healthy marine and coastal ecosystems; n = 25), 3.15 for Goal 2 (a competitive, innovative, and sustainable Blue Economy; n = 27), and 3.04 for Goal 3 (fostering investment in the Black Sea Blue Economy; n = 27). The comparatively lower rating for Goal 3 corroborates the funding and investment-coordination gaps identified in Section 4.



Source: BlueDial stakeholder consultation survey, Bulgaria, 2026 (n = 27; CMA Goal 1, n = 25).

Figure 5.2. Perceived Maturity of the National BE Framework and CMA Alignment (mean ratings).

When asked which EU strategies and frameworks related to the Blue Economy they were familiar with, respondents most frequently cited the Common Maritime Agenda for the Black Sea (17 of 27, 63%) and the Maritime Spatial Planning Directive (13, 48%), followed by the European Ocean Pact, the EU Ports Strategy, the EU Strategic Approach to the Black Sea Region, and the Marine Strategy Framework Directive (11 each, 41%). The EU Mission “Restore our Ocean and Waters”

was cited by 10 respondents (37%), the EU Maritime Security Strategy by 6 (22%), and the EU Industrial Maritime Strategy by only 3 (11%); 4 respondents (15%) indicated familiarity with none of the listed instruments.

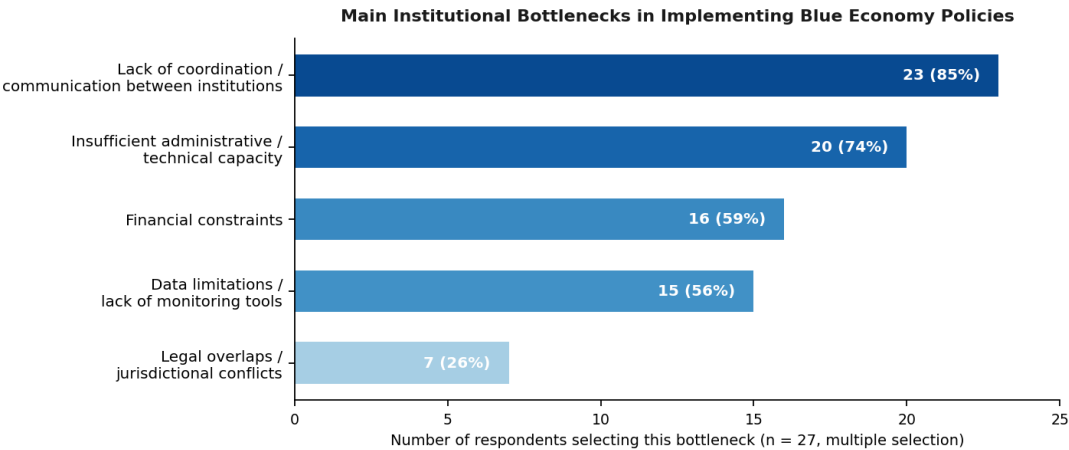
Asked to identify the most significant legal or regulatory gaps hindering Blue Economy development, respondents most frequently pointed to the absence of a dedicated Blue Economy law or unified legal framework, the lack of a clear national vision or strategy, weak enforcement of existing legislation, and insufficient inter-ministerial coordination mechanisms.

Complicated administrative procedures and lack of unified legal framework with long term and financially supported measures for support of blue economy are among the main barriers hindering blue economy investments. Other barriers are related to the lack of communication on institutional level and between business, industry and other stakeholders as well as inconsistencies in the available information (scattered data and operational incompatibility).

These responses directly correspond the central governance gap identified in Section 2 of this report: the absence of a dedicated national Blue Economy strategy and coordinating mechanism. The results from the stakeholders survey provide more detail to other aspects with regard to overlapping or gaps of institutional jurisdictions, fragmented implementation of the existing framework, insufficient integration between sectoral policies, inefficient coordination between the institutions, etc.

5.3 Institutional Framework and Cooperation

A majority of respondents, 20 of 27 (74%), described coordination between national institutions on Blue Economy governance as “poor” (overlapping responsibilities, lack of communication), while the remaining 7 (26%) described it as “good/adequate” (functional, but sectorally divided or fragmented). No respondent selected the most favourable rating. This finding reinforces the institutional mapping presented in Section 1, which identified the absence of a dedicated cross-sectoral Blue Economy coordination body as a structural feature of Bulgaria’s governance landscape.



Source: BlueDial stakeholder consultation survey, Bulgaria, 2026 (n = 27).

Figure 5.3. Main Institutional Bottlenecks in Implementing Blue Economy Policies (n = 27, multiple selection).

Lack of coordination or communication between agencies was the most frequently selected institutional bottleneck (23 of 27, 85%), followed by insufficient administrative or technical capacity (20, 74%), financial constraints (16, 59%), data limitations and lack of monitoring tools (15, 56%), and legal overlaps or jurisdictional conflicts (7, 26%). The consistency between this ranking and

the qualitative legal-gap findings in Section 5.2 indicates that coordination and capacity, rather than the absence of any legal basis, are perceived as the principal constraints on implementation.

Regarding transnational cooperation at Black Sea level, respondents rated their organisation's cooperation at a mean of 3.11 (1 = non-existent/very weak, 5 = highly developed and integrated; n = 27), indicating moderate engagement overall. Successful cooperation was most frequently reported through EU-funded project frameworks (Horizon Europe, Interreg, and earlier programmes such as MARSPLAN-BS), typically involving partners from Romania, Turkey, Ukraine, Georgia, and Greece. Several respondents noted that such cooperation tends to be project-based rather than the result of standing intergovernmental coordination mechanisms, and that regional bodies such as the Commission for the Protection of the Black Sea Against Pollution have faced disruption since the start of the war between Russia and Ukraine, which several respondents identified as a current barrier to regional cooperation. Other reported barriers included misalignment of regulatory and financial frameworks between countries and, for smaller organisations, limited capacity to engage in international cooperation independently of cluster-based support. Lack of information from the national institutions on BE initiatives as well as lack of funding measures and instruments on national level are pointed out as a barrier to widening the partnerships and development of the BE.

5.4 Funding Instruments and Accessibility

Respondents were asked to identify the funding instruments currently supporting Blue Economy initiatives in their sector or organisation. EMFAF and Horizon Europe were the most frequently cited, each selected by 20 of 27 respondents (74%), followed by the Interreg NEXT Black Sea Basin Programme (16, 59%), EU investment instruments such as InvestEU and BlueInvest (9, 33%), the LIFE Programme (8, 30%), national or local grants (6, 22%), and the Erasmus+ Programme (5, 19%).

Table 5.1. Funding Instruments Cited as Currently Supporting BE Initiatives (n = 27, multiple selection)

Funding Instrument	Respondents	Share of Respondents
EMFAF (European Maritime, Fisheries and Aquaculture Fund)	20	74%
Horizon Europe (incl. Mission Restore our Ocean and Waters / SBEP)	20	74%
Interreg NEXT Black Sea Basin Programme	16	59%
EU investment instruments (InvestEU, BlueInvest, etc.)	9	33%
LIFE Programme	8	30%
National or local grants	6	22%
Erasmus+ Programme	5	19%

Accessibility of these instruments for local stakeholders was rated at a mean of 3.0 on a five-point scale (1 = very difficult to access, 5 = very accessible; n = 27), indicating a moderate but unresolved accessibility gap. The most frequently cited barriers to accessing funding were complex bureaucratic procedures, insufficient awareness of available opportunities, and limited capacity to provide the required co-financing — particularly among smaller organisations.

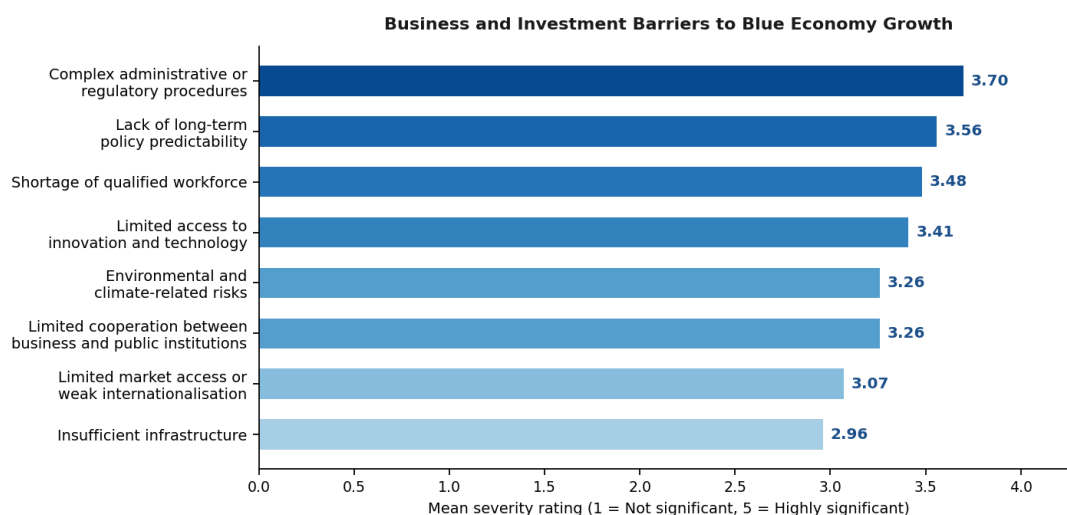
From the business perspective, the application for EU funding is highly competitive and in combination of the heavy administrative requirements is limiting the access of start-up companies to EU grants.

The Blue Economy sector with the greatest lack of adequate funding or investment are marine renewable energy and marine biotechnology/blue innovation due to the absence of a dedicated legal framework for offshore energy development and the high commercialisation risk and limited private investor interest for early-stage marine biotechnology — followed by decarbonisation and green infrastructure investment in ports and maritime transport, monitoring of the marine environment and introduction of new technologies for sustainable management of the marine resources.

These findings are directly consistent with the investment gaps identified for these sectors in Section 3.

5.5 Business Environment and Blue Skills

From a business and investment perspective, respondents rated complex administrative or regulatory procedures as the most significant barrier to Blue Economy growth (mean 3.70 on a five-point severity scale), followed by lack of long-term policy predictability (3.56), shortage of qualified workforce (3.48), and limited access to innovation and technology (3.41). Insufficient infrastructure was rated the least significant of the eight barriers assessed (2.96), suggesting that, in stakeholders' perception, governance predictability and administrative simplification are more pressing constraints than physical infrastructure deficits. Limited access to funding for blue economy investments remains a significant barrier due to the high capital expenditures for modernization and decarbonisation of BE businesses. Other sectoral aspects limiting BE growth include the seasonality of some of the sectors (like coastal and maritime tourism) and competition for space between different technology related sectors (maritime non-living resources, maritime renewable energy), and others related to the environment (blue bioeconomy, aquaculture and fisheries, etc).

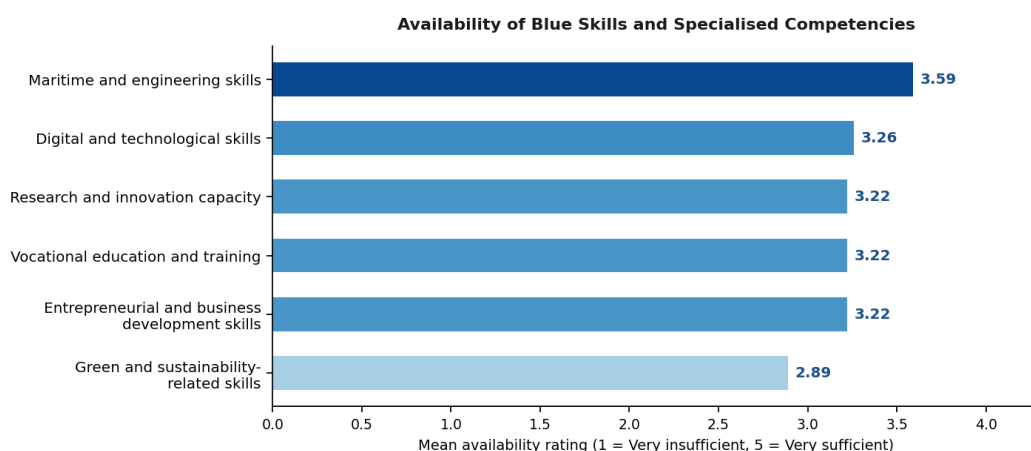


Source: BlueDial stakeholder consultation survey, Bulgaria, 2026 (n = 27).

Figure 5.4. Business and Investment Barriers to Blue Economy Growth (mean severity rating, n = 27).

On the availability of blue skills and specialised competencies, maritime and engineering skills received the highest mean rating (3.59 on a five-point sufficiency scale), followed by digital and technological skills (3.26), and research and innovation capacity, vocational education and training, and entrepreneurial/business development skills (3.22 each), and more specifically the commercialization of innovations and research results. Green and sustainability-related skills

received the lowest rating of the six categories assessed (2.89), identifying this as the most significant skills gap reported by respondents.



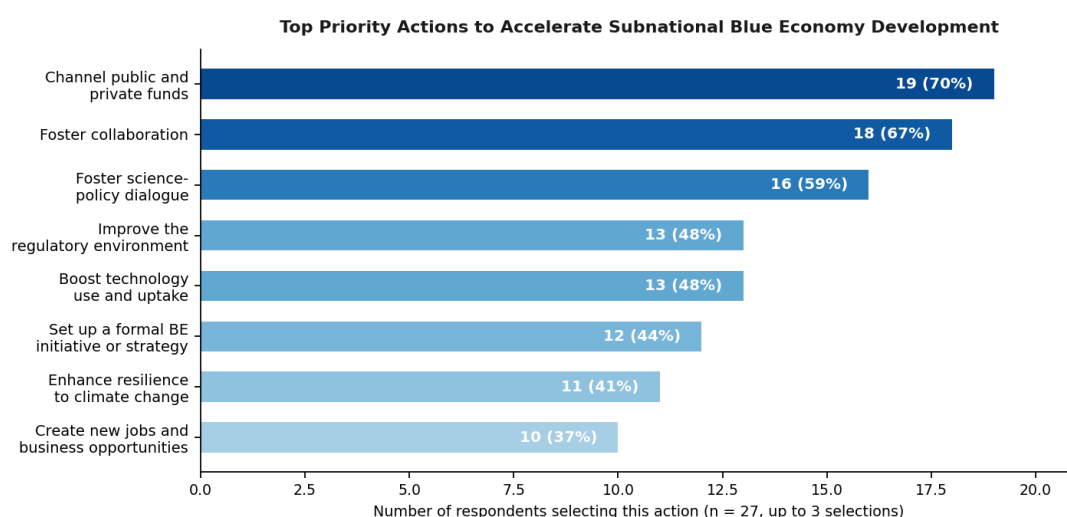
Source: BlueDial stakeholder consultation survey, Bulgaria, 2026 (n = 27).

Figure 5.5. Availability of Blue Skills and Specialised Competencies (mean sufficiency rating, n = 27).

Asked which measures would help address blue skills gaps, respondents most frequently recommended strengthening cooperation between business and academia, participation in transnational research-industry projects, updating and modernising curricula to reflect digital and “green” competencies, and expanding continuing and vocational education for the existing workforce. Several respondents also noted that academic staff and teaching content in maritime-related programmes have not kept pace with technological change, reinforcing the case for structured industry-academia cooperation mechanisms.

5.6 Subnational Priorities and Recommendations

At the subnational (regional or local) level, respondents most frequently identified lack of financial resources (20 of 27, 74%), lack of coordination between levels of government (16, 59%), lack of a clear and comprehensive Blue Economy strategy (15, 56%), financial risks for businesses (13, 48%), and inadequate technical and administrative capacities (13, 48%) as the most significant challenges hindering Blue Economy development.



Source: BlueDial stakeholder consultation survey, Bulgaria, 2026 (n = 27).

Figure 5.6. Top Priority Actions to Accelerate Subnational Blue Economy Development (n = 27, up to 3 selections).

Correspondingly, the priority actions most frequently selected to accelerate subnational Blue Economy development were channeling public and private funds into the sector (19, 70%), fostering collaboration (18, 67%), fostering science-policy dialogue (16, 59%), improving the regulatory environment (13, 48%), and boosting technology use and uptake (13, 48%).

When asked about the greatest untapped potential for the Blue Economy in Bulgaria and the wider Black Sea region, blue biotechnology and marine renewable energy were the two most frequently cited categories (17 of 27 each, 63%), followed by maritime digitalisation (15, 56%) and the circular blue economy (13, 48%). This perception of untapped potential in precisely the sectors identified above as facing the greatest funding gaps points to a consistent stakeholder view: Bulgaria's emerging Blue Economy sectors carry significant promise but require dedicated investment and regulatory support to develop.

Asked to recommend one major policy change or strategic action, respondents converged strongly around a single theme, independently proposing measures such as a National Council for the Blue Economy under the Council of Ministers, a dedicated Blue Economy law, a unified national strategy with integrated management of marine resources, and an interdepartmental or integrated national coordination mechanism bringing together public administration, business, science, and local authorities. This conclusion from the stakeholders' survey confirms the institutional and legal coordination gap identified as the central finding of Sections 1 and 2 of this report.

5.7 Synthesis and Key Findings

The stakeholder consultation results presented in this section are highly consistent with, and substantially reinforce, the desk-research findings of Sections 1 to 4. Respondents across different institutions, from national ministries to businesses and civil society organisations, independently identify the same structural gap: the absence of a dedicated national Blue Economy strategy, law, or coordination body. Where the desk research identifies this gap through institutional and legal mapping, the consultation confirms it as the most salient constraint as experienced directly by practitioners.

Stakeholders agree on the need for a dedicated national Blue Economy coordination mechanism, strategy, or legal framework, confirming the central governance gap identified elsewhere in this report. Coordination and administrative/technical capacity, rather than the absence of legal provisions, are perceived as the principal implementation constraints. Respondents are mostly from established sectors (maritime transport, ocean monitoring, pollution control) while marine renewable energy and blue biotechnology — though comparatively underrepresented in the respondent profile — are simultaneously flagged as the areas of greatest untapped potential and the greatest funding gap. Among business and investment barriers, administrative complexity and policy predictability, are rated more significant than physical infrastructure; among blue skills categories, green and sustainability-related competencies are identified as the weakest.

These findings, together with the institutional mapping (Section 1), legal and strategic framework (Section 2), funding landscape (Section 4), and sector and target group analysis (Section 3), complete the analytical and empirical baseline of Deliverable D.1.1. Section 6 will synthesise findings across all dimensions to identify strategic priorities and recommendations for Blue Economy development in Bulgaria and the wider Black Sea region.

Section 6. Potentials and Gaps (SWOT Analysis)

This section synthesises the findings of Sections 1 to 5 into a structured cross-sectoral assessment of Bulgaria's Blue Economy, organised around two dimensions: strengths and opportunities, and weaknesses and gaps. Rather than repeating the detailed institutional, legal, sectoral, funding, and stakeholder consultation analysis presented earlier in this report, this section draws out and consolidates the recurring cross-cutting themes that emerge when those five analytical strands are read together, with cross-references to the relevant sections.

6.1 Strengths and Opportunities

6.1.1 Established Sectors as an Economic Foundation

Bulgaria's Blue Economy is built on a set of established maritime sectors — maritime transport (shipping, shipbuilding and ship repair, ports and logistics), coastal and maritime tourism, and marine living resources — which together generate the large majority of Blue Economy gross value added and employment (Section 3). These sectors are supported by significant infrastructure, industrial capacity, specialised skills, and integration into European and global value chains; maritime transport in particular is rated a high development priority in the sector mapping matrix (Table 3.3). This is a foundation to build on rather than a constraint to manage: the principal opportunity lies in accelerating technological modernisation, the green and digital transition, and workforce renewal across these sectors, rather than in creating new economic activity from a low base.

6.1.2 Emerging Sectors and Innovation Potential

Bulgaria possesses meaningful research, engineering, and scientific capabilities in several emerging Blue Economy domains — marine renewable energy, marine biotechnology, ocean observation and monitoring, and blue carbon and coastal wetland restoration (Section 3.3, Section 3.4). The stakeholder consultation corroborates this from the perspective of practitioners: marine biotechnology and marine renewable energy were jointly identified as the areas of greatest untapped Blue Economy potential (63% of respondents each), followed by maritime digitalisation (56%) and the circular blue economy (48%) (Section 5.6).

6.1.3 Funding Portfolio, Institutional Assets, and Cooperation Opportunities

Bulgaria's Blue Economy benefits from access to a diverse portfolio of European and national funding instruments spanning business competitiveness, research and innovation, skills development, transport connectivity, environmental protection, territorial development, and fisheries and aquaculture (Section 4.5.2). The principal opportunity identified throughout this report is strengthening of strategic coordination and mobilisation of the instruments that already exist, including the development of integrated investment pipelines and stronger support for innovation commercialisation. This is reinforced by an institutional ecosystem that, while fragmented (Section 6.2.1), already spans public authorities, research and educational institutions, and private sector and civil society actors engaged across Blue Economy sectors (Section 3). Transnational cooperation, while assessed as moderate overall (mean 3.11 of 5), is most frequently reported as successful through EU-funded project frameworks — Horizon Europe, Interreg, and historic programmes such as MARSPLAN-BS — with partners from Romania, Turkey, Georgia, and Greece (Section 5.3), providing a working basis for deeper regional cooperation under BlueDial and successor initiatives.

6.2 Weaknesses and Gaps

6.2.1 Institutional and Governance Fragmentation

The single most consistent finding across this report is the absence of a dedicated, cross-sectoral Blue Economy coordination body, strategy, or legal framework. Section 1 finds that Blue Economy competences are distributed across different ministries and subordinate agencies without a coordination mechanism; Section 2 identifies the absence of a dedicated national Blue Economy strategy as the central governance gap; and Section 4 shows that, in the absence of such a strategy, Blue Economy investment is channelled through separate managing authorities without coordinated cross-sectoral prioritisation. The stakeholder consultation directly confirms this: 74% of respondents rated institutional coordination on Blue Economy governance as poor, lack of coordination or communication between agencies was the most frequently cited institutional bottleneck (85%), and when asked to recommend a single policy change, respondents independently converged on proposals for a national coordination mechanism, strategy, or law (Section 5.3, Section 5.6).

6.2.2 Capacity, Skills, and Technical Expertise Gaps

Bulgaria's Blue Economy workforce faces a skills mismatch consistent with the EU-wide pattern identified by the European Commission's BlueComp framework (CINEA/EMFAF, 2025): gaps concentrate in green transition competences, digital and data skills, blue entrepreneurship and EU funding access, and governance and multi-level coordination skills, compounded by an ageing workforce and a broader brain-drain dynamic. The stakeholder consultation identifies green and sustainability-related skills as the weakest of six skills categories assessed (mean 2.89 of 5), and points to a parallel capacity gap among institutional actors, particularly limited research-to-market pathways between research institutions and businesses, and constrained capacity among Blue Economy SMEs to access EU funding and the green and digital transition (Section 5.5).

6.2.3 Funding Access and Sector-Specific Gaps

Access to funding to Bulgarian BE innovative companies with high growth potential remains limited due to the high risk and high capital costs related to the development of BE businesses. The establishment of innovation funding mechanism at national level combined with investment readiness support, specifically targeting the Blue Economy would help overcome this barrier.

Beyond the absence of coordinated strategic prioritisation, specific structural gaps in funding coverage are identified for individual sectors: marine renewable energy development is constrained by an unmet regulatory precondition (offshore zone designation) rather than by an absence of eligible instruments; marine biotechnology lacks a national research-to-market programme or shared infrastructure fund; and fisheries processing and marketing investment remains only partially covered by EMFAF allocations (Section 4.5.2). The stakeholder consultation reaches a consistent conclusion from a different angle: marine renewable energy and marine biotechnology are simultaneously identified as the sectors with the untapped potential (Section 6.1.2) and the greatest funding gap, and complex administrative or regulatory procedures and a lack of long-term policy predictability are rated more significant barriers to Blue Economy investment than physical infrastructure constraints (Section 5.4, Section 5.5).

6.2.4 Spatial Concentration and Missing Actor Coordination

Blue Economy activity in Bulgaria is spatially concentrated in two main clusters — the Varna agglomeration (an estimated 58% of coastal Blue Economy revenues) and the Burgas agglomeration (22%) — leaving smaller coastal municipalities, despite hosting significant fisheries, aquaculture, and eco-tourism assets, comparatively underserved by capacity-building and investment activity. This compounds the institutional fragmentation noted above: a persistent gap exists between Bulgaria's research base and the business and policy actors positioned to apply its outputs (Section 1).

6.3 Synthesis

Key Finding — Potentials and Gaps

Bulgaria's Blue Economy combines a strong, economically significant foundation of established maritime sectors with genuine and potential for the development of emerging domains — marine renewable energy, marine biotechnology, digitalization of the maritime sectors, ocean monitoring and maritime security, and the circular blue economy. The principal constraint on realising this potential is not the absence of economic activity, research capability, or funding instruments, but the fragmented nature of governance, investment coordination, and skills development. The same sectors flagged as carrying the greatest opportunity are, consistently, those facing the greatest funding and regulatory gaps — indicating that targeted coordination, rather than new instruments, is the most direct lever available to Bulgaria's Blue Economy stakeholders and policymakers.

These findings provide the evidence base for the strategic priorities and policy recommendations to be developed under Activity 1.5 of the BlueDial project, and complete the analytical baseline of Deliverable D.1.1.

Section 7. Conclusions and Recommendations

This section presents the principal conclusions emerging from the institutional, legal, sectoral, funding, and stakeholder consultation analysis carried out in Sections 1 to 6, and translates them into a set of recommendations structured around four priority areas: policy improvements, institutional strengthening, funding optimisation, and the enhancement of Black Sea-level cooperation. These recommendations are formulated at the level of strategic direction; their further elaboration into actionable strategic priorities for Bulgaria's Blue Economy will be carried out under Activity 1.5 of the BlueDial project, building on the evidence base established by this report.

7.1 Key Conclusions

The following conclusions are confirmed throughout the six sections of the report, including institutional, legal, sectoral, financial, and results from the stakeholder survey.

- **Need for a common Blue Economy vision and framework.** Blue Economy-related policies and responsibilities in Bulgaria are distributed across multiple ministries and subordinate agencies, reflecting the cross-sectoral nature of maritime and coastal activities. While relevant policy frameworks exist across different sectors, there is currently no dedicated mechanism for coordinating Blue Economy priorities across policy areas (Sections 1, 2, 6.2.1). This challenge is also reflected in the stakeholder consultation, where 74% of respondents assessed inter-institutional coordination as poor (Section 5).
- **Strong formal alignment, uneven practical implementation.** Bulgaria's legal and strategic framework is broadly aligned with EU policy objectives and the Common Maritime Agenda for the Black Sea. Key instruments, including the Maritime Spatial Plan, the Marine Strategy, and the EMFAF Programme, are in place. However, implementation capacity and stakeholder engagement remain more developed at national level than at regional and local level. (Section 2).
- **Established sectors like** Maritime transport, tourism, and marine living resources together generate the large majority of Blue Economy value added and employment and are the immediate priority for modernisation and the green and digital transition; (Section 3).
- **Funding is available but fragmented.** Multiple European and national funding instruments are available to support Blue Economy development in Bulgaria, managed by different authorities and target different sectors and stages of development. Access to funding for blue economy Businesses remains low due to complicated administrative procedures and lack of support for application to the EU programmes combined with relatively high capital expenditures for modernization and decarbonisation of BE sectors. BE funding mechanism needs to be established at national level, specifically targeting the Blue Economy combined with investment readiness support to Bulgarian BE innovative companies with high growth potential. (Section 4).
- **Stakeholder consultation confirms the desk research.** Respondents identified coordination and communication between institutions and stakeholders as one of the main challenges facing Blue Economy development, cited by 85% of participants. Similarly, many respondents highlighted the potential value of a dedicated coordination mechanism or strategic framework to support a more integrated approach to Blue Economy governance. (Section 5).
- **Regional cooperation is institutionally mature but operationally project-based.** Bulgaria participates actively in Black Sea regional frameworks the (Common Maritime Agenda, the Bucharest Convention, BSEC, and Interreg NEXT Black Sea Basin, etc.), but transnational cooperation is rated only moderate by stakeholders (mean 3.11 of 5) and is sustained mainly through individual EU-funded projects rather than established structural mechanisms (Section 5, Section 6.1.3).

7.2 Recommendations

The following recommendations respond directly to the conclusions set out above. They are grouped into four priority areas: **policy improvements, institutional strengthening, funding optimisation, and the enhancement of Black Sea-level cooperation**, recognising that these

areas are interdependent: progress on institutional coordination, for example, both depend on and reinforces progress on policy and funding integration.

7.2.1 Policy Improvements

- **Initiate a discussion for the development of a national Blue Economy strategy** (or a dedicated cross-sectoral chapter within an existing strategic instrument) providing a unifying policy framework across sectors. Lack of common vision and strategy on BE is identified as the main gap in both the institutional mapping (Section 1) and the stakeholder consultation (Section 5).

7.2.2 Institutional Strengthening

- **Research on available GPs for Establishing an inter-ministerial Blue Economy coordination body** (e.g. a National Council for the Blue Economy under the Council of Ministers), as directly proposed by stakeholders during the consultation (Section 5) or **Broadening the mandate of the Consultative Council on Maritime Spatial Planning**, or create a complementary mechanism, to cover cross-sectoral Blue Economy coordination beyond spatial planning alone (Section 1, Section 2).
- **Further explore and promote the Burgas Municipality model** of a dedicated Blue Economy directorate and municipal strategy to other coastal municipalities, to support exchange of experience and institutional capacity building (Section 6.2.4).
- **Strengthen research-to-business linkages and technology transfer mechanisms** between research institutions and the private sector to translate Bulgaria's marine biotechnology and ocean monitoring research capacity into commercial application (Section 3.3, Section 6.1.2).
- **Address blue skills and workforce gaps**, in particular digital and sustainability skills (rated lowest by stakeholders) and alternative-fuel and digital skills for the maritime workforce, including through curriculum development with maritime education and training institutions (Section 5, Section 6.2.2).

7.2.3 Funding Optimisation

- **Promote the establishment of BE funding mechanism at national/ regional level.**
- **Develop an integrated Blue Economy investment pipeline** that aggregates and sequences EMFAF, ERDF, Horizon Europe, LIFE, CEF, Interreg, and national co-financing instruments under coordinated strategic prioritisation, addressing the fragmentation across multiple managing authorities identified in Section 4.5.
- **Strengthen investment-readiness support for Blue Economy SMEs** — as stakeholder consultations suggest that limited investment readiness remains a more significant barrier than access to funding (Section 4).

7.2.4 Enhancing Black Sea-Level Cooperation

- **Strengthen Black Sea collaboration Black Sea Region** at all stakeholder levels, support the development of a coordinated Black Sea networks (for example: facilitate dialogue and cooperation among Black Sea stakeholders to support the development of a coordinated Short Sea Shipping (SSS) network and improve regional transport connectivity).

Across all four recommendation areas, the analysis points to the potential value of stronger coordination mechanisms linking existing policy frameworks, funding instruments, institutions, and stakeholder initiatives. Bulgaria has established a foundation for Blue Economy development

through its policy framework, access to European and national funding, research and education capacities, and active stakeholder community. Enhanced coordination across these elements could further support the pursuit of shared strategic priorities and improve the effectiveness of implementation. These conclusions are confirmed consistently from both the desk research (Sections 1–4) and the stakeholder consultations (Section 5) and will serve as the basis for the strategic priorities to be developed under Activity 1.5 of the BlueDial project.

These conclusions and recommendations, together with the institutional mapping (Section 1), legal and strategic framework (Section 2), sector and target group analysis (Section 3), funding landscape (Section 4), and stakeholder consultation results (Section 5), complete the analytical baseline of Deliverable D.1.1 and provide the evidence base for the strategic priorities and policy recommendations to be developed under Activity 1.5 of the BlueDial project.

ANNEX I. Legal and Regulatory Instruments Applicable to Bulgaria's Blue Economy

This Annex provides a detailed inventory of the international, EU and national legal instruments underpinning Bulgaria's maritime and Blue Economy governance framework, complementing the legal and strategic analysis presented in Section 2 of this report. Instruments are grouped by source and subject matter: international conventions (I.1–I.5); EU regulations (I.6–I.9); EU directives and framework decisions (I.10); national laws (I.11); national secondary legislation (I.12); and maritime spatial planning and public maritime relations (I.13). Bracketed numbers reproduce the source citation markers from the underlying legal mapping exercise on which this Annex is based; they are retained for traceability but do not resolve to a reference list within this document.

I.1 Maritime Law, Maritime Spaces, Jurisdiction and Disputes

- **United Nations Convention on the Law of the Sea, 1982 (UNCLOS)**, ratified by law and in force for Bulgaria since 14 June 1996; used as the basis for the regime governing maritime spaces, the EEZ, the continental shelf, and the marine environment. [7][8][9]

I.2 Shipping Safety, Navigation and Technical Standards

- **Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREG 72).**
- **International Convention on Load Lines, 1966 (Load Lines / LL 66).**
- **International Convention on Tonnage Measurement of Ships, 1969 (ITC 69).**

I.3 Pollution from Ships, the Marine Environment and Liability

- **International Convention for the Prevention of Pollution from Ships, 1973/1978 (MARPOL 73/78)**, including the 1997 Protocol. [11][12][14]
- **International Convention on Civil Liability for Oil Pollution Damage, 1969 (CLC).**
- **International Convention on Civil Liability for Oil Pollution Damage, 1992 (CLC 92).**
- **International Convention on Civil Liability for Bunker Oil Pollution Damage, 2001 (Bunkers Convention 2001).** [14]
- **International Convention on the Control of Harmful Anti-fouling Systems on Ships, 2001 (AFS 2001).** [14]
- **Convention on the Protection of the Black Sea Against Pollution (Bucharest Convention).**

I.4 Search, Rescue and Distress

- **International Convention on Maritime Search and Rescue, 1979 (SAR Convention).**

I.5 Maritime Labour, Crews and Social Standards

- **Maritime Labour Convention, 2006 (MLC 2006).** [14][23]
- **ILO Convention No. 147 concerning Minimum Standards in Merchant Ships.** [16]
- **Seafarer recruitment and placement intermediary activity** is carried out in accordance with the ILO and IMO conventions ratified by, and in force for, Bulgaria. [24]

I.6 Maritime Safety, Shipping, Ports and Information Systems (EU Regulations)

- **Regulation (EC) No 2099/2002** establishing a Committee on Safe Seas and the Prevention of Pollution from Ships, aimed at improving the implementation of EU law on maritime safety, the prevention of pollution from ships, and on-board living and working conditions. [29]
- **Regulation (EU) 2019/1239** establishing a European Maritime Single Window environment (EMSWe), including databases on ships, locations, and dangerous and polluting cargo; repeals Directive 2010/65/EU. [30][31]
- **Regulation (EU) 2025/2434** on the European Maritime Safety Agency (EMSA), covering maritime safety, security, search and rescue, border control, fisheries, customs control, law enforcement, and the environment. [32][33]
- **Regulation (EU) No 1257/2013** on ship recycling and the control of hazardous materials such as asbestos, ozone-depleting substances, PCBs, PFOS, and anti-fouling systems. [34]
- **Regulation (EC) No 391/2009** on common rules and standards for ship inspection and survey organisations, applied in the authorisation of recognised organisations. [35]
- **Regulation (EC) No 725/2004** on enhancing ship and port facility security, referenced in connection with security assessments and plans. [36]

- **Regulation (EU) 2023/1805** on the use of renewable and low-carbon fuels in maritime transport (FuelEU Maritime). [37]
- **Implementing Regulation (EU) 2023/2599** on the administration of shipping companies for the purposes of the EU Emissions Trading System; refers to Regulation (EU) 2015/757 on the monitoring, reporting and verification of emissions from maritime transport and to Directive 2002/59/EC. [38][39]
- **Implementing Regulation (EU) 2024/1975** implementing Directive 2014/90/EU on marine equipment; repeals Implementing Regulation (EU) 2023/1667. [40][41]

I.7 Maritime Borders, Coast Guard and Frontex (EU Regulations)

- **Regulation (EU) No 656/2014** establishing rules for the surveillance of the external sea borders in the context of operational cooperation coordinated by Frontex. [21][42]
- **Regulation (EU) 2019/1896** on the European Border and Coast Guard; maritime operations must guarantee the safety of persons apprehended or rescued, of participating units, and of third parties. [22][43]

I.8 Fisheries, the Fishing Fleet and Marine Biological Resources (EU Regulations)

- **Regulation (EU) No 1380/2013** on the Common Fisheries Policy. [44][45]
- **Regulation (EC) No 1005/2008** establishing a system to prevent, deter and eliminate illegal, unreported and unregulated (IUU) fishing, applicable to IUU fishing activities on the territory of the Member States, in Community waters, in waters under the jurisdiction of third countries, and on the high seas. [46]
- **Regulation (EU) 2017/2403** on the sustainable management of external fishing fleets. [47]
- **Regulation (EU) No 1379/2013** on the common organisation of the markets in fishery and aquaculture products. [48]
- **The Fisheries and Aquaculture Act** additionally references Regulation (EU) 2019/1241, Regulation (EU) 2019/833, Regulation (EU) 2019/473, Regulation (EU) 2017/1130, Regulation (EU) 2017/625, Regulation (EU) 2016/1139, Regulation (EU) No 508/2014, Implementing Regulation (EU) No 1420/2013, Implementing Regulation (EU) No 404/2011, Regulation (EC) No 1224/2009, Regulation (EC) No 216/2009, Regulation (EC) No 762/2008, Regulation (EC) No 1921/2006, and other regulations in the fields of fisheries, control, statistics, technical measures, and fishing vessels. [49]

I.9 Environment, Emissions, Registers and Programmes (EU Regulations)

- **Regulation (EC) No 166/2006** concerning the establishment of a European Pollutant Release and Transfer Register, applied through reporting obligations. [51]
- **Regulation (EU) 2021/783** establishing the LIFE Programme, referenced among the functions of the Minister of Environment and Water. [52]
- **Regulation (EU) 2015/757** on the monitoring, reporting and verification of greenhouse gas emissions from maritime transport, referenced in connection with the application of the EU ETS to shipping companies. [38]
- **Regulation (EC) No 336/2006** on the implementation of the International Safety Management Code within the Community, referenced in connection with EU maritime law. [38]

I.10 EU Directives and Framework Decisions Transposed or Referenced in Bulgarian Legislation

- **Directive 2009/15/EC** on common rules and standards for ship inspection and survey organisations and for the relevant activities of maritime administrations. [53][54]
- **Directive 2009/18/EC** establishing the fundamental principles governing the investigation of accidents in the maritime transport sector. [53]
- **Directive 2009/20/EC** on the insurance of shipowners for maritime claims. [53]
- **Directive 2009/21/EC** on compliance with flag State requirements. [53]
- **Directive 2000/59/EC** on port reception facilities for ship-generated waste and cargo residues. [55]
- **Directive 2002/59/EC** establishing a Community vessel traffic monitoring and information system. [55]
- **Directive 2005/35/EC** on ship-source pollution and the introduction of penalties for infringements. [55][56]
- **Council Framework Decision 2005/667/JHA** to strengthen the criminal-law framework for the enforcement of the law against ship-source pollution. [55]
- **Directive 2014/90/EU** on marine equipment. [57]
- **Implementing Directive 2014/111/EU** amending Directive 2009/15/EC. [54]
- **Directive 2014/103/EU** adapting to scientific and technical progress the provisions on the inland transport of dangerous goods. [54]

- **Directive (EU) 2016/1629** laying down technical requirements for inland waterway vessels. [54]
- **Directive 2010/65/EU** on reporting formalities for ships arriving in and/or departing from ports of the Member States; identified in the sources as transposed by national ordinance, although Regulation (EU) 2019/1239 repeals it at EU level. [58][31]
- **Directive 2011/15/EU** amending Directive 2002/59/EC. [58]
- **Directive (EU) 2017/2109** on the registration of persons on board passenger ships and on reporting formalities. [58]
- **Directive (EU) 2019/883** on port reception facilities for the delivery of waste from ships. [58]
- **Directive 2005/65/EC** on enhancing port security. [59]
- **Directive 2009/45/EC** on safety rules and standards for passenger ships, referenced in connection with exemptions from voyage data recorder (VDR) requirements. [60]
- **Directive 2000/60/EC** — the Water Framework Directive. [61]
- **Directive 2007/60/EC** on the assessment and management of flood risks. [61]
- **Directive 2008/105/EC** on environmental quality standards in the field of water policy. [61]
- **Council Directive 92/43/EEC** on the conservation of natural habitats and of wild fauna and flora. [62]
- **Directive 79/409/EEC** on the conservation of wild birds. [62]
- **Directive 2006/105/EC** adapting environmental directives by reason of the accession of Bulgaria and Romania. [62]
- **Directive 2008/56/EC** — the Marine Strategy Framework Directive, referenced in the context of the Common Fisheries Policy. [63]
- **Directive 2006/87/EC** laying down technical requirements for inland waterway vessels, referenced in connection with emergency routes and exits on ships. [64]

I.11 National Laws

- **Law on Maritime Spaces, Internal Waterways and Ports of the Republic of Bulgaria** — the principal law governing the legal regime of maritime spaces, internal waterways and ports; regulates sovereignty, sovereign rights, jurisdiction and control in accordance with international law. [65]
- **Commercial Shipping Code** — governs commercial shipping, the Bulgarian nationality of ships, ship and transport documents, masters and crews, carriage, rights in rem, charter, insurance, accidents, salvage at sea and on rivers, and safety. [66]
- **Law on the Adoption of a Declaration under Article 287(1) of UNCLOS Recognising the Jurisdiction of the International Tribunal for the Law of the Sea.** [7]
- **Environmental Protection Act** — the general law on environmental protection, control, monitoring and information, environmental impact assessment, transboundary pollution, and international agreements. [67][68][69][70]
- **Water Act** — transposes the EU water directives; explicitly refers the protection of coastal waters, internal sea waters and the territorial sea from pollution from sources not based on land to the Law on Maritime Spaces, Internal Waterways and Ports. [61][71]
- **Waste Management Act** — the Executive Agency for Maritime Administration exercises control over the transboundary shipment of waste in accordance with this Act, international instruments, the Law on Maritime Spaces, Internal Waterways and Ports, and the Commercial Shipping Code. [72]
- **Black Sea Coast Spatial Development Act** — governs spatial planning of the territory and the water area, environmental protection, biodiversity, coastal protection, protected zones, cultural assets, and the adjoining water area. [73][74]
- **Fisheries and Aquaculture Act** — governs the ownership, management, use and protection of fishery resources in internal sea waters, the territorial sea, the contiguous zone, the continental shelf, and the EEZ. [75][76]
- **Defence and Armed Forces of the Republic of Bulgaria Act** — governs the defence of the territorial sea and the navigation regime in the exercise of defence. [77]
- **Regional Development Act** — refers the scope, content, preparation and adoption of the Maritime Spatial Plan to the Law on Maritime Spaces, Internal Waterways and Ports. [78]
- **Biological Diversity Act** — transposes the Habitats and Birds Directives, applicable also to protected marine/coastal zones falling within their scope. [62]

I.12 National Secondary Legislation

- **Ordinance on the Protection of the Environment in Marine Waters** — governs the procedure for achieving and maintaining good marine environmental status; applies to Bulgaria's marine waters, including the waters, seabed and subsoil up to the outer limit of sovereign rights, jurisdiction and control. [79][9]

- **Ordinance on Vessel Traffic Monitoring, Reporting and Management Systems and Information Services for Shipping in the Maritime Spaces of the Republic of Bulgaria** — governs vessel traffic systems, reporting, VTS, SafeSeaNet, dangerous and polluting cargo, places of refuge, and LRIT. [80][81][82][18]
- **Ordinance No 12 of 16.12.2010 on Port State Control Inspections** — lists the applicable international conventions: LL 66, SOLAS, MARPOL, STCW, COLREG, ITC, CLC, MLC, AFS, Bunkers, and their protocols/amendments. [14]
- **Ordinance No 11 of 26.04.2004 on Surveys of Ships and Shipowners** — governs surveys for safety, security, pollution prevention, and on-board working and living conditions. [26][25][83]
- **Ordinance No 5 of 01.09.2004 on Ship Documents** — governs the type, form, issuing authority, validity and retention of ship documents required by international agreements and national legislation. [84][85]
- **Ordinance No 4 of 15.12.2011 on the Authorisation and Withdrawal of Authorisation for the Survey of Ships and Shipowners** — governs recognised organisations, agreements with them, control, assessment and compliance with international conventions. [35][27][86][87]
- **Ordinance No 54 of 29.12.2016 on the Technical Requirements for and Conformity Assessment of Equipment on Seagoing Ships** — transposes Directive 2014/90/EU and refers to SOLAS, MARPOL and COLREG as “international instruments”. [11][57]
- **Ordinance No 20 of 08.09.2011 on Safety Rules and Standards for Passenger Ships** — defines sea areas A, B, C, D, lists of such areas, and requirements for ro-ro passenger ships. [13]
- **Ordinance No 16 of 20.06.2006 on the Handling and Carriage of Dangerous and/or Polluting Cargo by Sea and Dangerous Cargo on Internal Waterways** — refers to SOLAS, MARPOL, the IMDG Code, the INF Code, the IGC Code and the IBC Code. [12][88]
- **Ordinance on the Organisation of Border Passport, Customs, Health, Veterinary and Phytosanitary Control, and Control of Means of Transport, at Ports Serving Ships in International Traffic** — transposes EU acts on reporting formalities for ships and on port reception facilities. [58]
- **Ordinance on the Conditions and Procedure for Achieving Ship and Port Security under Article 106a of the Law on Maritime Spaces, Internal Waterways and Ports** — transposes Directive 2005/65/EC and implements the regime linked to Regulation (EC) No 725/2004. [59][36]
- **Ordinance No 7 of 23.05.2001 on the Procedure for the Visit, Manoeuvring and Stay of Ships in Ports and Anchorages, Loading/Unloading, and Communication with the Shore** — the Executive Agency for Maritime Administration assesses the admission and departure of ships with a view to safety and pollution avoidance. [89]
- **Ordinance No 8 of 25.01.2001 on the Quality of Coastal Marine Waters** — defines coastal marine waters, the baseline, the nautical mile, and marine and coastal ecosystems. [90]
- **Ordinance No H-8 of 09.03.2011 on the Navigation Regime in the Territorial Sea, Internal Waters, Ports and Anchorages in the Exercise of National Defence** — governs military control of shipping, prohibited zones, maritime corridors, and inspection and detention of foreign non-military vessels in the event of infringement. [91]
- **Ordinance on Navigation and the Border Regime in Internal Sea Waters, the Territorial Sea and Internal Waterways for Yachts, Boats and Other Craft Used for Sport, Tourism, Recreation and Water-Based Entertainment Services** — refers to COLREG and governs control by the Executive Agency for Maritime Administration, the Border Police Directorate, and the Naval Forces. [15][92][93]
- **Ordinance on Labour and Directly Related Relations between Crew Members/Service Personnel and the Shipowner** — governs crew manning, safe operation, working conditions, and the application of MLC 2006. [23][64]
- **Ordinance on the Conditions and Procedure for Carrying Out Employment Intermediary Activity** — for seafarers, refers to the ILO and IMO conventions ratified by, and in force for, Bulgaria. [24]
- **Ordinance on the Conditions and Procedure for the Carriage of Radioactive Substances** — for carriage by sea and internal waterways, this ordinance, SOLAS, and the international instruments to which Bulgaria is a party apply. [94]
- **Ordinance on Requirements for the Prevention of Major Accidents in the Search for, Exploration of, or Production of Oil and Natural Gas in the Territorial Sea, Continental Shelf and EEZ of Bulgaria in the Black Sea** — governs safety, the prevention of major accidents, emergency response, and oil spills. [95][96][97]
- **Organisational Rules of the Executive Agency for Maritime Administration** — governs functions relating to safety, ship control, environmental control, search and rescue, registers, ports, security, and participation in the IMO, the Danube Commission, and EU structures. [98][20]

- **Rules on the Functions, Tasks and Composition of the Consultative Council on Maritime Spatial Planning** — governs coordination on the Maritime Spatial Plan, the sustainable use of the marine water area and resources, the ecosystem approach, and the sea–land interface. [99][100]

I.13 Maritime Spatial Planning and Public Maritime Relations

- **Bulgaria's maritime spaces** comprise internal sea waters, the territorial sea, the contiguous zone, the continental shelf, and the exclusive economic zone. [101]
- **Internal sea waters** are defined under Article 6 of the Law on Maritime Spaces, Internal Waterways and Ports — waters between the coastline and the baselines, port waters, the Varna and Burgas bays, and waters between specified straight baselines. [102]
- **Exclusive Economic Zone (EEZ)**: its boundaries are determined by agreement with adjacent and opposite neighbouring states; within the zone, Bulgaria exercises sovereign rights over biological, mineral and energy resources, jurisdiction over artificial islands, scientific research, and the protection of the marine environment; all states enjoy freedom of navigation, overflight, and the laying of cables and pipelines. [1][103][104]
- **The Maritime Spatial Plan of the Republic of Bulgaria** covers the maritime spaces under Article 5(1) of the Law on Maritime Spaces, Internal Waterways and Ports and the coastal marine waters; it is not used for the determination or delimitation of maritime boundaries under UNCLOS. [105][106][8]
- **Maritime spatial planning** takes into account the specific characteristics of the Black Sea region, its resources, activities, environmental impacts, land–sea interactions, and cross-border cooperation; Bulgaria cooperates with Black Sea states, including within the framework of the Organization of the Black Sea Economic Cooperation and the Commission on the Protection of the Black Sea Against Pollution. [107]

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