



# Interreg



EUROPEAN UNION

## Danube Transnational Programme DAPhNE

### PORT ADMINISTRATION PROCESSES

#### **National report for Bulgaria**

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## List of abbreviations

- Minister of Transport, Information, Technologies and Communication (MTITC)
- Bulgarian Ports Infrastructure Company (BPICo)
- Executive Agency Maritime Administration (EAMA)
- Executive Agency for Exploration and Maintenance of the Danube River (EAEMDR)
- Maritime Space, Inland Waterways and Ports of the Republic of Bulgaria Act (MSIWPRBA)
- NUTS 3 (Classification of Territorial Units for Statistics)
- European Federation of Inland Ports (EFIP)
- European Sea Ports Organisation (ESPO)

## 1 The national report template – objective and description

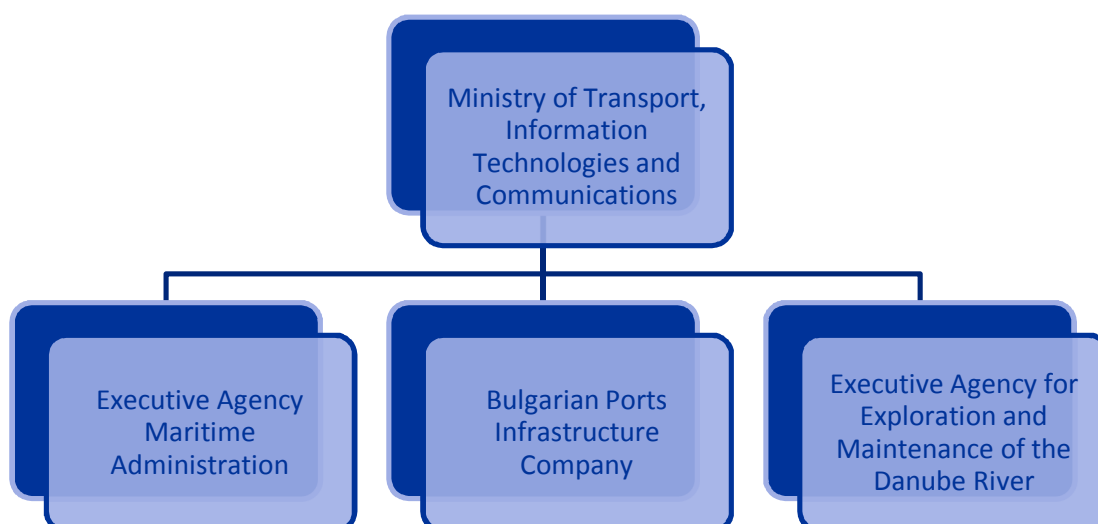
The objective of work package 4 of DAPhNE Project is to analyze the procedures that port authorities/administrations apply to vessel and terminal operators as well as to other users of port infrastructure and services, and its goal is to determine what aspects need to be simplified, modified, and eliminated to increase efficiency and reduce the red tape in connection to port administration processes.

To this end, surveys will be conducted in five countries and the survey results will be incorporated in five national reports, created based on the present national report template.

## 2 Introduction to Bulgarian port authorities

For the purpose of this report, the administrative structure in the water transport sector of the Republic of Bulgaria, as well as all the participants in this sector, will be examined. The policy of each state is judged precisely on the type of administrative structures, created by the executive authority in order to ensure the implementation of legislation and the political and strategic goals set. All the necessary administrative structures in the field of water transport in the Republic of Bulgaria are established and operate successfully in full interaction with the other participants in this sector. The main administrative structures, related to the water transport in the Republic of Bulgaria are as follows:

**Figure № 1 Main administrative structures, related to the water transport in Bulgaria**



**I. Minister of Transport, Information Technologies and Communications** is a central sole body of the executive authority for conducting the state policy in the field of transport. In the field of water transport, the Minister implements his powers, assisted by his subordinate administrations.

1. The Minister of Transport, Information Technologies and Communications conducts state policy in the field of:

- transport;
- development of road infrastructure, together with the Minister of Regional Development and public Works;
- information technologies and electronic communications;
- postal services.

The Minister of Transport, Information Technologies and Communications manages and represents the Ministry of Transport, Information Technologies and Communications (MTITC).

2. The Minister exercises his powers in accordance with the Constitution and the laws of the country, such as:

- conducts the state investment policy in the sphere of transport, information technology and communications;
- participates in the development, organization, coordination and control of the implementation of the state policy in his competence for full membership of the Republic of Bulgaria in the European Union;
- participates in the definition and implementation of the policy for participation in the Cohesion Fund and the Structural Funds of the European Union, in the pre-accession programs and projects of the European Union, in the areas of his competence;
- carries out bilateral cooperation with the Member States of the European Union, in the areas of his competence;
- participates in the implementation of the policy of joining Collective security organizations;
- prepares projects of international treaties to which the Republic of Bulgaria is a party in the areas of his competence and ensures the implementation of international treaties in these fields;
- represents the Republic of Bulgaria in the international transport organizations, the international organizations in the field of electronic communications and the information society, the Universal Postal Union, as well as in the European and regional organizations and structures of the postal services managing bodies;
- organizes and manages the preparation of transport and communication sectors for work in the context of military and non-military crises, disasters and threats related to national security;

- distributes and controls the spending of funds from the state budget for transport, information technology and communications;
- controls the activity of the secondary budget spenders;
- exercises the rights of the sole owner of the capital in the state-owned enterprises and in the commercial companies with state participation in the capital in the system of transport and communications;
- carries out the preparatory actions and submits proposals for the granting of concessions for state-owned objects, carries out other actions related to the granting and implementation of the concessions for which is authorized by law or by an act of the grantor under the conditions and by the order of the Law for Concessions and the Regulations for the Implementation of the Concessions Act;
- exercises other powers conferred by a law or a decree of the Council of Ministers,

### **3. The Minister shall exercise his powers in the field of transport by:**

- develops a strategy for the development and restructuring of transport;
- jointly with the Minister of Regional Development and Public Works, proposes to the Council of Ministers a road infrastructure development strategy and a medium-term program for its implementation;
- maintains and develops international initiatives, concludes international contracts for the construction of sections of the trans-European road network on the territory of the country, including for cross-border road connections, and concludes international contracts for construction and operation of transport corridors;
- creates safety conditions for commercial shipping and controls compliance with them;
- organizes and controls technically the investigation of accidents in maritime areas and inland waterways;
- maintain a system for mandatory and voluntary reporting of accidents in maritime areas and inland waterways;
- organizes the control of compliance with the conditions for carrying out public transport of passengers and cargo and the documents related to the transport;
- defines the transport documents, the conditions and procedures for approving the types of road vehicles and the modifications to their design and the requirements to be met by the drivers;
- issues technical capacity, technical fitness and nationality and market access rights in the field of transport and supervise the fulfillment of obligations related to them;
- assists the international representation of transport organizations and their participation in the international transport market;

- organizes the search, rescue and assistance activities for people, boats or aircraft in need in the search and rescue area for which the Republic of Bulgaria is in charge of the international treaties;
- controls the spending of the funds for transport provided by funds and banking institutions with state guarantee;
- issues radio licenses to radio operators of the Global Maritime Distress and Safety System for the maritime mobile service and the maritime mobile satellite service, radio operators of inland waterway vessels;
- conducts international coordination of radio frequencies and radio frequency bands, as well as radio equipment, which use them for the needs of national security and defense and for sea mobile, satellite navigation, maritime radionavigation and maritime radionavigation - satellite.

**II. Executive Agency Maritime Administration (EAMA)** is a national authority of the Republic of Bulgaria in the field of port state control, flag administration and coastal state control. It is a subordinate administrative structure to MTITC. Basically, the Agency's functions include the following:

- monitoring the implementation of provisions ensuring the security of:
  - a) ships flying the Bulgarian flag;
  - b) ports in the Republic of Bulgaria;
- collection and submitting information to the Minister of Transport, Information technology and Communications about the execution of the requirements for exploitation fitness of ports and objects under art. 111a, par. 1 of the Maritime Space, Inland Waterways and Ports of the Republic of Bulgaria Act (MSIWPRBA);
- shall give proposal to the Minister of Transport, Information technology and Communications for suspension of the activity or for temporary or permanent limitation of the operation of ports that do not meet the requirements of the law or deliver port services in violation of Art. 116, para. 5 of MSIWPRBA;
- shall exercise control on the observation of the technical safety of the port facilities, labor safety and of the safely conduct of cargo operations;
- shall set security levels on ships flying the Bulgarian flag and for the ports of the Republic of Bulgaria;
- shall exercise control on the observation of the requirements for open access to ports for public transport;
- shall give proposals to the Minister of Transport, Information technology and Communications about the revision of the amount of port dues;
- shall support the Minister of Transport, Information technology and Communications in the monitoring of the implementation of the concession contracts as well as the implementation of the contracts under § 74 para. 3 of MSIWPRBA;



- shall exercise control on the implementation of the contracts under art. 117b, para. 1 of MSIWPRBA;
- shall support the Minister of Transport, Information technology and Communications in the programming of the activities and monitoring the investments in the construction, reconstruction and modernization of the transport corridors in the field of maritime transport (ports, waterways, inland waterways), financed by the state budget or by loans, guaranteed by the state;
- shall support the Minister of Transport, Information technology and Communications in the coordination of detailed structural plans through which the territory and aquatory for construction of ports under art. 107 – 109 and of objects under art. 111a, para. 1 of MSIWPRBA;
- shall support the Minister of Transport, Information technology and Communications in the coordination of documents for the allotment of land and water areas for construction along the Black Sea and The Danube coastline, in the inland waterways and the territorial sea and areas of operation of the means of navigation security;
- shall submit to the Minister of Transport, Information technology and Communications motivated positions on the investment initiatives for construction of new or expansion of existing ports for public transport;
- shall approve the plans for the accepting and processing of waste;
- shall coordinate the port operators' plans prepared in cases of disasters, emergencies and accidents;
- shall execute other functions, assigned by the law or by an act of the Council of Ministers.

The Agency shall examine the European experience and shall propose to the board of the Fund “Inland waterways” measures for the regulation of the inland waterways fleet’s capacity and shall carry out the organizational and technical insurance of the Fund’s activity.

The Agency conducts examinations for professional competence for licensing of carriers of cargo on the inland waterways.

The territorial jurisdiction of the Agency covers:

- internal sea waters;
- territorial sea;
- the Bulgarian section of the Danube river;
- the land-based coastline, 100 meters wide, reported from the largest tide line; where there are settlements or a height less than 100 meters from the line of greatest outflow, the boundaries of the coastline coincide with the features of the settlement by the sea or at the height of the sea;
- the land-based coastline at a distance of 100 meters, measured from the line where the water surface of the Danube crosses the land of the Bulgarian section at the lowest water levels;

- the territory of the ports, including the zones under Art. 103, para. 6 and the objects under Art. 111a, para. 1 LMISPR, excluding military ports.

**II.** The Executive Agency for exploration and maintenance of the Danube river (EAEMDR) may be designated as another important structure within MTITC. The Agency provides administrative services to natural and legal persons, as well as it is responsible for implementation of activities and services related to the provision of the activities of the state authorities for safe navigation in accordance with the domestic and international law regarding the maintenance of the conditions and security for the navigation along the river Danube.

To ensure the safety and security of Danube shipping, the Agency carries out the following actions:

- continuous monitoring of the condition of the river;
  - timely removal and restoration of the damaged navigation signs and maintenance of the shipping route in accordance with the requirements and recommendations of the Danube Commission;
  - Providing operational information on the gauges of the shipping route;
  - Making corrections on the fairway;
  - Maintaining an active navigational conditions in the Bulgarian section of the Danube;
  - elaboration of water images of the risk sections for the navigation;
  - carrying out hydrographic measurements in the sections critical for shipping and for the security of the Ruse - Giurgiu Bridge;
  - continuous monitoring of hydromorphological changes, notification of critical stretches of the river (river thresholds) and taking appropriate action;
  - measurements of water quantities with Doppler technology;
  - daily dissemination of water level forecasts for hydro-meteorological stations Ruse and Silistra;
  - performing meteorological and climatic observations;
  - Issuing permits for use of a water settlements for extraction of sediment deposits from the Danube;
  - maintaining the conditions for timely localization and liquidation of potential oil spills;
- creating an optimal organization for timely forecasting of the nature and consequences of disasters, accidents and catastrophes.

**IV.** Highly significant for the development of the port activities along the sea ports and along the inland waterways in Republic of Bulgaria is **Bulgarian Ports Infrastructure Company**.

The Company shall exercise the powers of the Minister of Transport, Information Technology and Communications on the management and control of the port activities in the Republic of Bulgaria.

The MSIWPRBA regulates the object of activity and the status of Bulgarian Ports Infrastructure Company. Bulgarian Ports Infrastructure Company manages the port infrastructure of the public transport ports of national importance in accordance with the Maritime Spaces, Internal Waterways and Ports of the Republic of Bulgaria Act and is responsible for provision of information on traffic management and information services for shipping, distribution of marine information on safety and maintenance.

According to Art. 115 l of the MSIWPRBA Bulgarian Ports Infrastructure Company (BPICo) is a legal person within the meaning of Art. 62, para. 3 of the Commercial Law, with Headquarters in Sofia and Branches – Territorial Directorates in Burgas, Varna, Lom and Ruse.

The State grants to Bulgarian Ports Infrastructure Company property – public and private state property, determined by the Council of Ministers for implementation of the object of activities.

The object of activities of BPI Co includes:

- construction, reconstruction, rehabilitation and maintenance of the public transport ports of national importance;
- maintenance of the existing and the building of new approach canals, port aquatories, sea and river depots for the disposal of dredging mass, breakwaters, protection facilities and other servicing public transport ports of national importance;
- management of the property in public transport ports of national importance;
- elaboration, maintenance and storage of the register containing data on the port infrastructure of public transport ports of national importance;
- assistance to the Minister of Transport, Information Technology and Communications in exercising control over the implementation of the concession contracts and the contracts with the single-shareholder commercial companies for performance of the port services and activities;
- responsibility for the preparation, implementation and maintenance of security plans for port areas which include a public transport port of national importance;
- provision of access to public transport ports;
- construction and maintenance of facilities servicing the system for monitoring of ship movements and information and the Bulgarian river information system;

- securing the navigation safety in the territorial sea, the internal sea waters, the canals and the port aquatory.

Bulgarian Ports Infrastructure Company is responsible for provision of information on traffic management and information services for shipping, distribution of marine information on safety and maintenance. BPICo provides:

- services through the Global Maritime Distress & Safety System (GMDSS);
- telecommunication ship-shore / shore-ship services;
- services pertinent to traffic control and information support of shipping and the provision of river information services to ship traffic;
- hydrometeorological information.

Funds for the implementation of the Annual Program of BPICo shall be provided in accordance with Art. 115c, para. 1 of MSIWPRBA from:

- ✓ Port charges under Art. 103c, para. 1 of MSIWPRBA;
- ✓ Port services as per Art. 116, para 2 of MSIWPRBA;
- ✓ Revenues from own activities;
- ✓ Interest on deposits of own funds and defaults;
- ✓ State Budget;
- ✓ Activities related to the implementation of the object of activity of Art. 115m, para. 1;
- ✓ Funds provided free (donations);
- ✓ Grants under European Union Programs.

The spending of the funds forming the annual budgets of the BPICo. must ensure, in accordance with the provisions of the law:

- ❖ to implement the object of activity of BPI Co under Art. 115m, para. 1;
- ❖ to ensure safety of navigation channels and water area of public transport ports of national importance;
- ❖ BPICo sustentation.

Bulgarian Ports Infrastructure Company has head office, four branches-territorial directorates and three specialized divisions.

The General Management of Bulgarian Ports Infrastructure Company performs administrative, technical, financial, information and legal security and control of the company's activity.

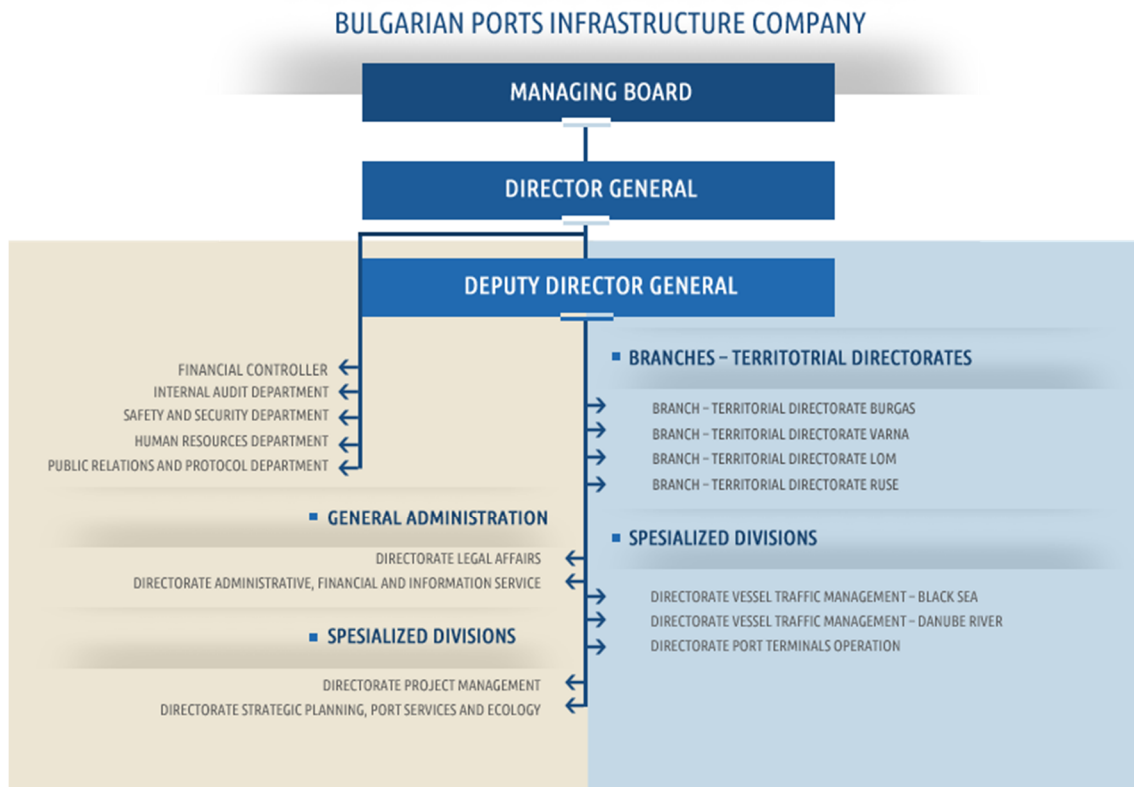
The Branches-Territorial Directorates are located in Burgas, Varna, Ruse and Lom.

The Specialized Divisions are:

- Directorate Vessel traffic Management – Black Sea;
- Directorate Vessel Traffic Management – Danube River;

- Directorate Port Terminals Operation.

**Figure № 2 Administrative Structure of Bulgarian Ports Infrastructure Company**



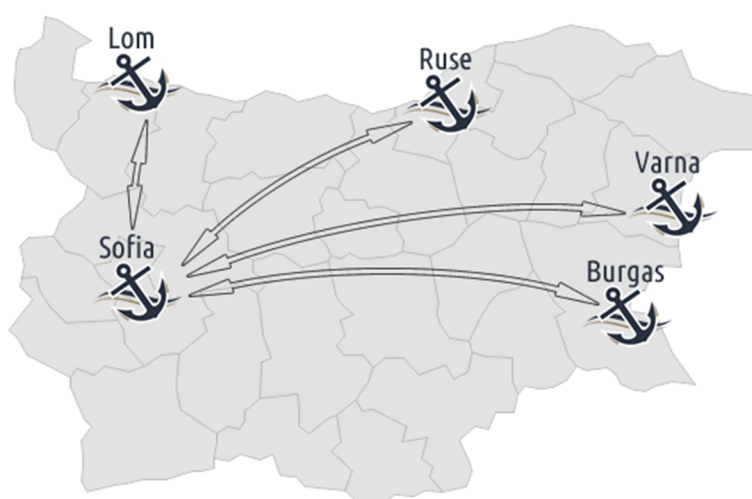
Source: [www.bgports.bg](http://www.bgports.bg)

The Branches-Territorial Directorates of Bulgarian Ports Infrastructure Company:

- implement the policy of BPICo in their area of operation;
- carry out in the region of operation navigational securing of shipping in the territorial sea, internal waterways, canals and ports water area;
- construct, reconstruct, rehabilitate and maintain the infrastructure of the public transport ports of national importance;
- maintain existing and build new approach canals, port water areas, sea and river landfills for disposal of dredge spoil, breakwaters, protective equipment and others service ports for public transport of national importance;
- exercise control, analyze and forecast the state of the port infrastructure, including the monitoring of facilities in public transport ports of national importance;
- approving the annual investment program of the port operators and their updates, exercise control over their implementation;
- participate in the development of master plans for public transport ports of national importance and their revision;

- participate in drafting a seven-year-program for construction, reconstruction, rehabilitation, maintenance, development and management of the infrastructure of public transport ports of national importance;
- prepare, maintain and keep a register containing data on port infrastructure of public transport ports of national importance;
- are responsible for the availability, performance and maintenance of the security plans for port areas, which include the ports for public transport of national significance of their region of operation;
- jointly with the structures of the Ministry of Defense implement defense mobilization events in the territory of which extend their powers;
- establish contacts with state authorities and local authorities of the territory in the area of environmental development of the region and overcoming the consequences of natural disasters and accidents.

**Figure № 3 Location of Branches-Territorial Directorates of BPICo**



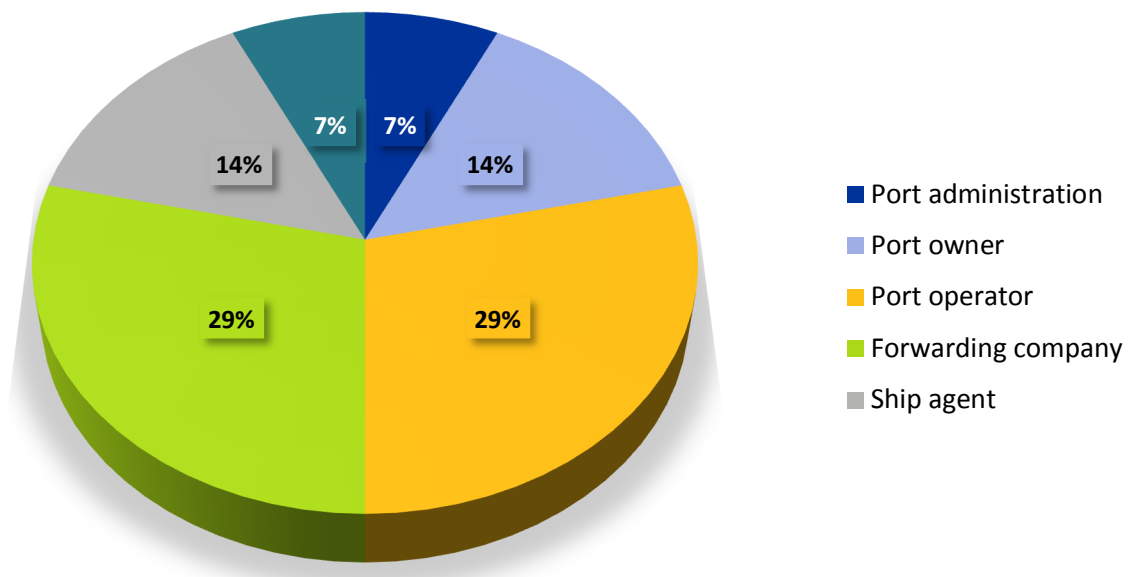
Source: [www.bgports.bg](http://www.bgports.bg)

### **3 Summary of the national report for Bulgaria**

In the scope of this survey, related to the implementation of administrative processes in ports, questionnaires were sent to 74 participants, belonging to different groups, which form the market of port services on the territory of the Republic of Bulgaria.

17 filled in questionnaires were received from the above described participants, which were broken down by relevant groups and by the completed part of the questionnaire. It should be noted that 4 of the participants responded to both parts, 9 responded only to part A and 13 only to part B. The respondents belong to the following groups, part of river water transport sector:

**Figure № 4 Distributionn by groups of respondents**



**I. Port administration/ authority<sup>1</sup>**

1. MTITC and secondary administrations within its structure;
2. Executive Agency for Exploration and Maintenance of the Danube River;
3. Bulgarian Ports Infrastructure Company.

**II. Port operators**

1. Port Invest ltd. – operator for port terminal Lom;
2. Rousse Free Zone JSCo.;
3. Port Complex Ruse JSCo. – operator of terminals Ruse – East, Ruse – Center, Tutrakan and Silistra;
4. Dredging fleet “Istar” JSCo. – operator for port terminal Svishtov.

**III. Private port owners and operators**

<sup>1</sup> The current port management structure in Bulgaria is characterized by typical responsibilities and responsibilities in port management, shared between the government, in conjunction with MTITC, EA Maritime Administration and BPICo. There is no independent port authority in the current Bulgarian model of port management. For the purposes of the survey conducted and with regard to the functions and responsibilities of the various entities, MTITC and BPICo. are designated as port authority, and the EAEMDR - as port administration.



1. Port Svishtov West JSCo. – operator of Port Svishtov – Sviloza;
2. ADM Bulgaria Logistics ltd. – operator of Port ADM Silistra.

**IV. Forwarding companies**

1. Donau Transit ltd.;
2. Holleman Bulgaria ltd.;
3. Werta ltd.;
4. Rubicon Shipping ltd.;
5. Hermes Lind ltd.;
6. Despred AD Branch Ruse.

**V. Ship agents**

1. Andreea Shipping and Trading ltd.
2. Port Invest ltd. as a ship agent
3. Holleman Bulgaria ltd.

The distributed questionnaire was not completed by control organizations and inspections. It has been filled in by the BPICo. and MTITC in their capacity as authorities, and the EAEMDR as an administration.

The analyzed questionnaires were received from different categories of respondents with headquarters in Silistra, Ruse, Svishtov, Lom and Sofia. Except information about smaller terminals, the report presents the views of the port authorities and port users about the biggest port centers on the Danube in Bulgaria - Ruse-East, Svishtov and Lom.

## **4 General information regarding the research conducted**

Period of the research: **04.09.2017 – 16.11.2017**

Number of filled in questionnaires: **17 (23%)**

Rate of non-responses: **77% (57 out of 74)**

### **Particular problems encountered during the research process:**

According to the work plan that BPICo created to conduct the survey, in September, October and November, a questionnaire template was sent to different port stakeholders. One of the problems encountered was the amendment of the questionnaire after it was already sent to the recipients. This resulted in receiving partial information from some of the respondents, as only some of the questions of the original template are retained in the latest version of the document. The change of the questionnaire led to the need for additional contact with respondents to supplement the information or if they refused to cooperate - a further study by the Consultant of this report.



Another problem was the lack of feedback from a large number of respondents. Although BPICo had conversations with recipients such as the Executive Agency Maritime Administration and a lot of companies, they didn't fill the questionnaire. This led to incomplete coverage of the situation in Bulgaria. To get a clear view of the current situation, besides analyzing the received questionnaires, a further study of publicly known data on the port sector in the country was carried out.

Another major obstacle was the circumstance that some of the respondents expressed the opinion that the questions are either not relevant to their activity or do not correctly and fully reflect the information they provide. This had an additional negative effect on the level of feedback.

The willingness of the participants to fill in the questionnaire quickly has led to a formal answer to questions from most respondents and where open responses are required, they are not filled in at all.

## 5 General presentation of Danube Ports in Bulgaria

There are 38 port terminals in the Bulgarian section of the Danube River. 15 of them are public transport ports of national importance, 20 are ports of regional importance and 3 are ports of special purpose.

The study of the port terminals located in the Bulgarian section of the Danube River falls within the territorial scope of the two Branches-Territorial Directorates of BPICo, Ruse and Lom respectively. The territorial distribution of the ports and their terminals is based on NUTS 3 (Classification of Territorial Units for Statistics).

Region of operation of Branch-Territorial Directorate Ruse is from kilometer 374,100 to kilometer 645 of the Bulgarian section of the Danube River with head office Ruse. Branch-Territorial Directorate Ruse serves the infrastructure of:

### **Public transport ports of national importance Ruse**

1. **Port terminal Ruse - east** is part of public transport port of national importance Ruse. It is specialized for general, bulk and liquid cargo, ro-ro and containers; mooring services; supply of electricity, water and communications to vessels; supply of food and other products.

Berths: 14

Capacity: 2 500 000 t/y.

Total Length of Berths: 1490 m

Maximum actual depth in front of berths: 2,50 m

Opened storage area: 190 500 sq.m.

Covered storage area: 15 800 sq.m.

Operator: Port Complex Ruse JSCo.

**Figure № 5 Port terminal Ruse – East**



*source: <http://www3.bgports.bg>*

**2. Port terminal Ruse – centre** is part of public transport port of national importance Ruse. It is specialized for passenger services; mooring services; supply of electricity, water and communications to vessels.

Berths: 3 /currently equipped with only one pontoon for one berth/

Total Length of Berths: 270 m

Maximum actual depth in front of Berths: 2,50 m

Operator: Port Complex Ruse J.S.Co.

**3. Port terminal Ruse – West** is part of Public transport port of national importance Ruse. It is designed for handling cargo and mail; mooring services; supply of electricity and communications to vessels; supply of food and other products.

Berths: 12

Total Length of Berths: 1395 m

Maximum actual depth in front of Berths: 2,50 m

Capacity: approx. 2 000 000 t/y

Opened storage area: 27 600 sq.m.

Covered storage area: 8 900 sq.m.

Operator: Bulgarian Ports Infrastructure Company

**Figure № 6 Port terminal Ruse – West**



Source: <http://www3.bgports.bg>

4. **Port terminal Silistra /passenger/** is part of Public transport port of national importance Ruse. It is designed for passenger services; mooring services; supply of electricity and communications to vessels; ship bunkering /water, fuel, oils/; supply of food and other products.

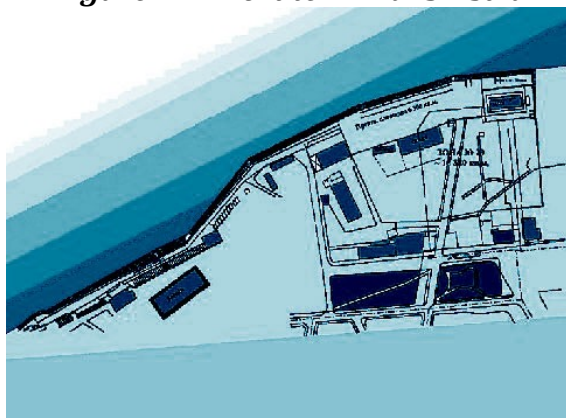
Berths: 3

Total Length of Berths: 300 m

Maximum actual depth in front of Berths: 2,00 m

Operator: Port Complex Ruse J.S.Co.

**Figure № 7 Port terminal Silistra**



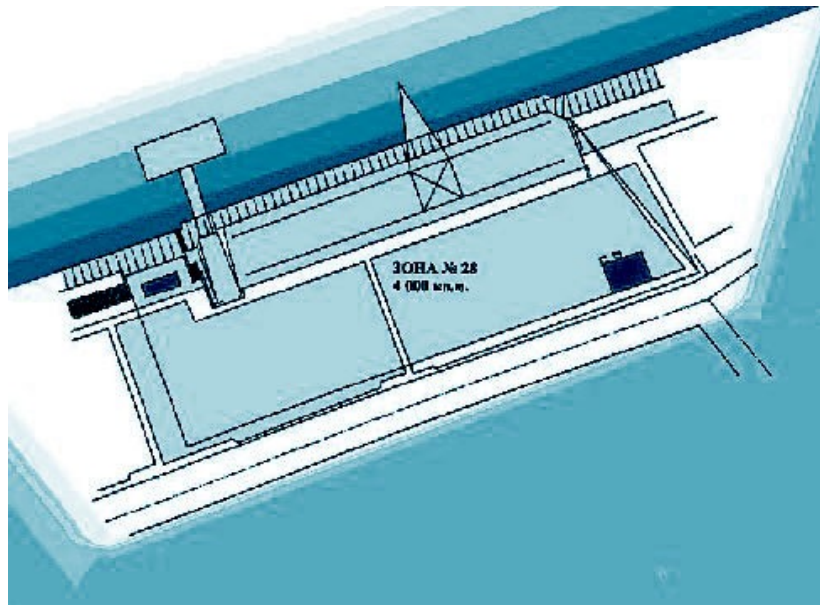
source: <http://www3.bgports.bg>

5. **Port terminal Tutrakan** is part of Public transport port of national importance Ruse. It is designed for general and bulk cargo handling; passenger services; mooring services; supply of electricity, water and communications to vessels; supply of food and other products.

Berths: 2

Total Length of Berths: 110 m  
Maximum actual depth in front of Berths: 1,00 m  
Capacity: 100 000 t/y  
Opened storage area: 2 500 sq.m.  
Covered storage area: 0 sq.m.  
Operator: Port Complex Ruse J.S.Co.

**Figure № 8 Port terminal Tutrakan**



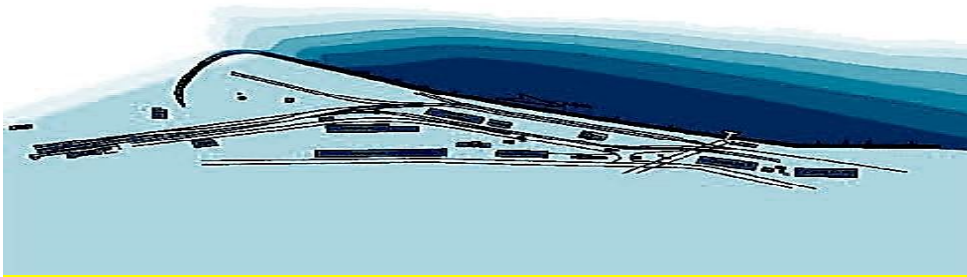
source: <http://www3.bgports.bg>

6. **Port terminal Svishtov** is part of Public transport port of national importance Ruse. It is designed for general, bulk and liquid cargo handling; passenger services; Ro-Ro services.

Berths: 8  
Total Length of Berths: 902 m  
Maximum actual depth in front of Berths: 2,50 m  
Capacity: 1 000 000 t/y  
Opened storage area: 22 800 sq.m.  
Covered storage area: 6 100 sq.m.  
Concessionaire: Dredging fleet "Istar" JSCo.

**Figure № 9 Port terminal Svishtov**





Source: <http://www3.bgports.bg>, <http://www.df-istar.com/services.html>

7. **Port terminal Somovit** is part of Public transport port of national importance Ruse. It is designed for general and bulk cargo handling; passenger services; mooring services; mooring; supply of electricity, water and communications to vessels; supply of food and other products.

Berths: 3

Total Length of Berths: 300 m

Maximum actual depth in front of Berths: 2,50 m

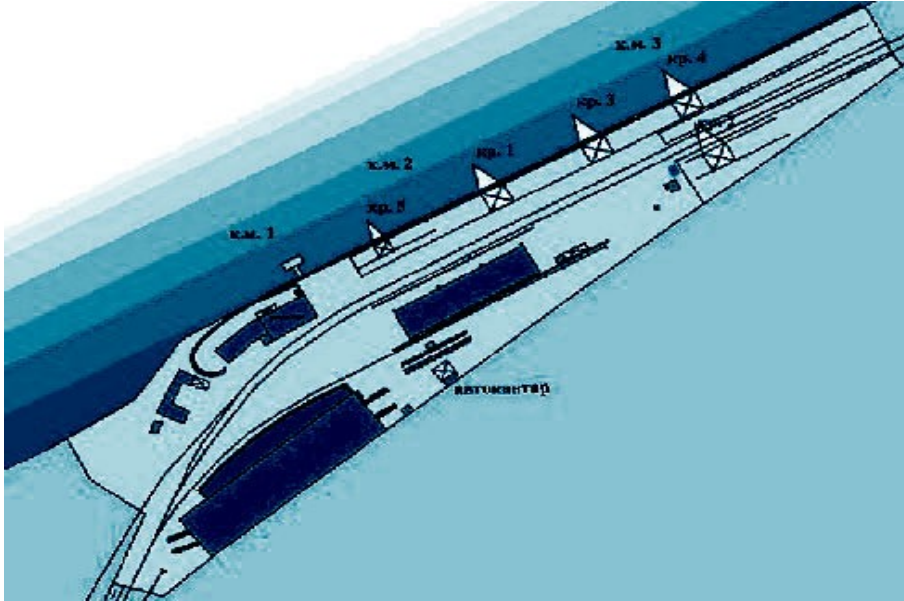
Capacity: approx. 500 000 t/y

Opened storage area: 9 700 sq.m.

Covered storage area: 2 175 sq.m.

Concessionaire: „Octopod - C” ltd.

**Figure № 10 Port terminal Somovit**



source: <http://www3.bgports.bg>

8. **Ferryboat terminal Silistra** (not in exploitation ) is part of Public transport port of national importance Ruse for Ro-Ro and mail handling; passenger services.

Berths: 1

Total Length of Berths: 30 m

Maximum actual depth in front of Berths: 1,10 m

Operator: Bulgarian Ports Infrastructure Company

**Figure № 11 Ferryboat terminal Silistra**



source: <http://www3.bgports.bg>

9. **Ferryboat terminal Nikopol** is part of Public transport port of national importance Ruse. It is designed for ro-ro and ferry services for vehicles, buses, agricultural and other self-propelled machines; passenger services; mooring; supply of electricity and communications to vessels; supply of food and other products.

Berths: 1  
Total Length of Berths: 30 m  
Maximum actual depth in front of Berths: 2,50 m  
Concessionaire: Bulgarian River Shipping J.S.Co.

**Figure № 12 “Ferry terminal Nikopol”;**



source: <http://www.nikopol-bg.com/>

**Public transport ports of regional importance Ruse**

1. Silistra – Polaris 8 – general and bulk cargo handling;
2. Silistra - Lesil – general and bulk cargo handling; mooring; supply of electricity and communications to vessels;
3. ADM Silistra – bulk cargo handling;
4. Ruse – Oil terminal Arbis - processing of oil products and bunkering;
5. Port Bulmarket – Ruse – general, bulk and liquid cargo handling, including dangerous cargo – classes 2, 3 and 9; mooring services; supply of electricity and communications to vessels; bunkering; reception and processing of ship generated waste;
6. Danube dredging fleet - Ruse - general and bulk cargo handling; supply of electricity, water and communications to vessels; mooring services; bunkering; towing;
7. Sviloza terminal - general and bulk cargo handling; supply of electricity, water and communications to vessels;
8. TPP Sviloza terminal - general and bulk cargo handling; supply of electricity, water and communications to vessels; towing/dragging/; supply of food and other products and services related to vessels;
9. Petrol – Somovit – processing of oil products and bunkering;
10. Ruse – Free zone - processing of oil products; mooring; bunkering;
11. Belene - general and bulk cargo handling;

12. Nikopol – passenger services;
13. Dubal Ve Ko – Ruse - general and bulk cargo handling; supply of electricity and communications to vessels;
14. East Point – Silistra – passenger services; mooring; supply of electricity, water and communications to vessels; bunkering; supply of food and other products;
15. Pristis - passenger services; mooring; supply of electricity, water and communications to vessels; bunkering; supply of food and other products.

### **Special purpose ports under art. 109 of MSIWPRBA**

1. Special purpose port of Executive Agency for Exploration and Maintenance of the Danube River - Ruse - Stay and repair of vessels, mooring and supply of electricity and water, hydrotechnical research and construction;
2. Special purpose port „Rousse Shipyard West” - Shipbuilding and repair;
3. Special purpose port „River service - Ruse” - repair of vessels; mooring; supply of electricity and communications to vessels; bunkering.

Region of operation of Branch-Territorial Directorate Lom is from kilometer 645 to kilometer 845,650 of the Bulgarian section of the Danube River with Head office in Lom. Branch- Territorial Directorate Lom serves the infrastructure of:

### **Public transport ports of national importance Lom**

1. **Port terminal Lom** is part of Public transport port of national importance Lom and is specialized in general and bulk cargo handling.

Berths: 13

Total Length of Berths: 1335 m

Maximum actual depth in front of Berths: 2,40 m

Capacity: approx. 2 500 000 t/y.

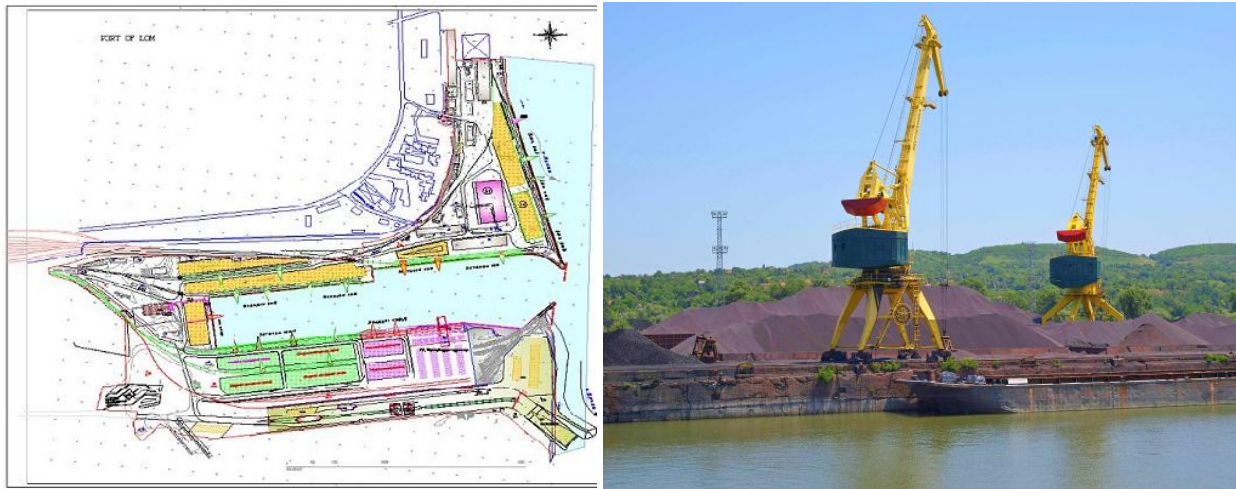
Opened storage area: 58 000 sq.m.

Covered storage area: 8 343 sq.m.

Operator: Port Invest ltd.

**Figure № 13 Port terminal Lom**





source: <http://www3.bgports.bg>

2. **Port terminal Oryahovo** is part of Public transport port of national importance Lom and is specialized in general and bulk cargo handling; passenger services; supply of electricity and water to vessels.

Berths: 3

Total Length of Berths: 221 m

Maximum actual depth in front of Berths: 2,40 m

Capacity: approx. 500 000 t/y

Opened storage area: 4 400 sq.m.

Covered storage area: 962 sq.m.

Concessionaire: Slanchev Dar AD

**Figure № 14 Port terminal Oryahovo**



source: <http://www3.bgports.bg>

3. **Port terminal Vidin - Center** is part of Public transport port of national importance Vidin and is specialized in passenger services; supply of electricity and water to vessels.

Berths: 4

Total Length of Berths: 1 440 m

Maximum actual depth in front of Berths: 2,40 m

Operator: Port Vidin ltd.

**Figure № 15 Port terminal Vidin – Center**



source: <http://www3.bgports.bg>

4. **Port terminal Vidin – South** is part of Public transport port of national importance Vidin and is specialized in general and bulk cargo handling; supply of electricity to vessels.

Berths: 2

Total Length of Berths: 208 m

Maximum actual depth in front of Berths: 2,40 m

Capacity: approx. 500 000 t/y

Opened storage area: 18 000 sq.m.

Operator: Bulgarian Ports Infrastructure Company

**Figure № 16 Port terminal Vidin – South**



source: <http://www.marad.bg>



5. **Port terminal Vidin – North** is part of Public transport port of national importance Vidin and is specialized in general, bulk, non-hazardous liquid cargo and containers handling; supply of electricity, water and communications to vessels; supply of food and other products; preventing oil spills and cleaning of oil pollution; and other services.

Berths: 3

Total Length of Berths: 300 m

Maximum actual depth in front of Berths: 2,40 m

Capacity: approx. 300 000 t/y

Opened storage area: 10 000 sq.m.

Concessionaire: Bulgarian River Shipping J.S.Co.

**Figure № 17 Port terminal Vidin – North**



source: <http://www3.bgports.bg>

6. **Port terminal Ferryboat Complex Vidin** is part of Public transport port of national importance Vidin and is specialized in Ro-Ro and passenger services; supply of electricity, water and communications to vessels.

Berths: 1

Total Length of Berths: 40 m

Maximum actual depth in front of Berths: 2,40 m

Concessionaire: Bulgarian River Shipping J.S.Co.

*Figure No 18 Port terminal Ferry Complex Vidin*



source: <http://www.airgroup2000.com>

**Public transport ports of regional importance Lom**

1. Ro-Ro SOMAT – Vidin – Ro-Ro handling; mooring; supply of electricity, water and communications to vessels;
2. Ferryboat Complex – Oryahovo - Ro-Ro handling and passenger services;
3. Ecopetroleum – Vidin (Taifun) – processing of oil products and bunkering;
4. Danube dredging fleet Dunim – Kozloduy - general and bulk cargo handling;
5. Danube dredging fleet Badin – Vidin - general and bulk cargo handling; mooring; supply of electricity and water to vessels;
6. Free zone – Vidin - processing of oil products and bunkering.

## 5 Research results

### 5.1. Research conducted on port owners/authorities – data obtained from the ports under survey

**Number of filled in questionnaires: 9 out of 17 /53%/**

**Rate of non-responses: 47%**

The responses received reflect the opinion of a significant part of the authorities and owners of Bulgarian Danube ports - Lom, Svishtov, Ruse, Tutrakan and Silistra (the regions are marked on the map).

**Figure № 19 Map of Republic of Bulgaria**



source: <http://www.nationsonline.org/oneworld/map/bulgaria-political-map.htm>

### 5.1.1 The cargo types handled

The highest percentage of positive responses were received for the groups: dry bulk cargo (22 %) and break bulk (19 %), followed by moisture resistant break bulk (16 %). Without a share in the cargo types handled are refined petroleum products, crude oil and dangerous goods. Cargo handling information is irrelevant for a total of 4 respondents – authorities and terminal owners: MTITC – administrative structure; BPICo’s Branch-Territorial Directorate Lom and Branch-Territorial Directorate Ruse; Executive Agency for Exploration and Maintenance of the Danube River.

Crude oil and petroleum products are handled at terminals, which are not included in the scope of the current study. Usually these are private regional ports.

**Table № 1 Distribution of cargo types handled by terminals**

№	Cargo type	Lom	Svishtov	Ruse	Silistra/ Tutrakan	Total
		availability				
1.	Dry bulk	X	X	X	X	6
2.	Container		X	X		2
3.	Break Bulk	X	X	X		5
4.	High and heavy cargo	X		X		2
5.	Petroleum products refined					0
6.	RO-RO Cargo		X	X		2
7.	Liquid bulk			X		1
8.	Moisture resistant break bulk	X	X	X		4
9.	Crude oil					0
10.	Dangerous goods					0
11.	Other	General – metals and others		Machinery and equipment; местодомуване and repair of vessels, etc.		3

Cargo types, which are handled in port terminals included in this study can be gathered to the following main groups:

- Agricultural products and live animals - maize, wheat, etc.;
- Solid mineral fuels - coal;
- Products of ferrous and non-ferrous metallurgy - hot-rolled steels, steel wire, etc.;
- Fertilizers;
- Break bulk – pallets, big-bags and others similar to them.



In its response Port terminal Svishtov, with a port operator Dredging fleet Istar, pointed out that the main cargo types handled are: dry bulk, break bulk and ro-ro cargo. The capacity of the terminal for cargo handling per year is 1 000 000 t.

Terminal Svishtov - Svilosa indicated that the main cargo types handled are: dry bulk, break bulk and containers. The capacity of the terminal for cargo handling per year is 200 000 t.

Port ADM Silistra is specialized in dry bulk cargo handling (grain). Grain trade is also the core business of the private company, which operates it.

The terminals within the area of BPICo Lom can handle dry bulk; break bulk; moisture resistant bulk; as well as general, metal and other cargoes. In this case the answers overlap with the operator's responses (Port Invest ltd in this case)

The terminals within the area of BPICo Ruse can handle: dry bulk, break bulk, containers, high and heavy cargo, liquid cargo, as well as ro-ro cargo. The processing capacity of listed cargo at the terminals per year is up to 8 million tons. Ruse – East, Ruse-West, Svishtov, Somovit and Tutrakan terminals and Ferry complex Nikopol can handle different cargo types. Port Ruse – Centre is mainly used for stay of ships and Ferry complex Silistra is currently not functioning. Again, the answers overlap with the operators' responses (for example Port Complex Ruse and others).

The experts from Port Complex Ruse J.S.Co. point out that terminals Ruse – East and Tutrakan can handle: dry bulk, containers, break bulk, high and heavy cargo, ro-ro cargo, liquid, moisture resistant bulk cargo and machinery and equipment. The capacity of the two terminals for cargo handling per year is respectively 2 500 000 t and 100 000 t.

According to the answers given by the concessionaire of the port of Lom about the types of cargo which it is able to handle, it is clear that it owns equipment for handling of dry bulk, break bulk, high and heavy cargo and moisture resistant bulk cargo. The capacity of the port is not mentioned in the response of the questionnaire.

### 5.1.2 Storage and warehousing facilities

**MTITC** has a role of port authority and has no direct responsibility for storage and warehousing facilities in ports. **BPICo** is owner of the open and closed storage and warehousing facilities in the **ports of national importance**. Operators and concessionaires, which responded to this question, use these facilities under a contract with MTITC. Private ports such as ADM Silistra are also the owners of the storage and warehousing facilities.

Of all the respondents, 5 stated availability of open warehouses and again 5 - presence of closed warehouses. Out of a total of 9 respondents, 56% own storage and warehousing facilities.

None of the respondents stated the availability of a dangerous goods warehouses. Such facilities are present at terminals, which do not fall in the scope of the respondents.

ADM Silistra owns silos and doesn't own open storages.

Port Tutrakan, which is operated by Port Complex Ruse J.S.Co. and Port Svishtov Sviloza (private) have only open storages. All other operators, which responded to the question, own open and closed storage and warehousing facilities.

Port Svishtov, which is concessioned until 2038, states that it owns 60 000 sq.m. open and 4 500 sq.m. closed storage area, which proves its ability to reach the maximal cargo handling capacity of the port for one year. In this case, the information provided by the concessionaire contradicts the officially published data. The official data says that the area of the storage and warehousing facilities is about 29 000 sq.m. The total area of the port is 81 917 sq.m. and it has 8 berths.

The total area of Port Svishtov – Sviloza, owned and operated by Port Svishtov West AD, is 15 882 sq.m. and it has 2 470 sq. m. open storage area.

ADM Bulgaria Logistics ltd. is owner and operator of Port ADM Silistra. The total area of the port is 21 000 sq.m. and it has 1 berth. The port has only closed storage facilities – silos.

As it was already mentioned, in Bulgaria there is no autonomous port authority. Currently BPICo, through its branches – territorial directorates, exercises lot of the functions and obligations that are typical for an European port authority. In the area of Branch-Territorial Directorate Lom there are 4 port terminals granted on a concession – Lom for 35 years, Oryahovo for 25 years, Vidin-North and Ferry Complex Vidin for 30 years.

In the territorial scope of BPICo's Branch-Territorial Directorate Lom there is a port granted for management according to §74, paragraph 3 of the MSIWPRBA<sup>2</sup> - Port Terminal Vidin - Center, as well as terminal operated by BPICo, because of terminated concession contract on 11.04.2016 – Port Terminal Vidin – South (currently MTITC is in procedure to sign a contract with a new concessionaire).

The total area of the above listed ports is 570 336 sq.m<sup>3</sup>. These terminals own open and closed storage and warehousing facilities.

In the area of BPICo's Branch-Territorial Directorate Ruse fall Port terminals of national importance, which are:

- Ruse – East – not concessioned;

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<sup>2</sup> Contracts between MTITC and port operators with state ownership for the provision of port services.

<sup>3</sup> BPICo carries out port services in the event that a port operator contract has been terminated earlier. In this case, the BPICo. shall provide port services in the relevant port until the conclusion of a new contract in accordance with the law.



- Ruse – West – not concessioned;
- Svishtov – under concession for 31 years since 2007;
- Somovit – under concession for 22 years since 2009;
- Tutrakan – not concessioned;
- Ferryboat Complex Nikopol – under concession for 35 years since 2013.

The total area of the above listed port terminals is 131.2 ha. They have open and closed storage and warehousing facilities sufficient to store the volume of goods that are intended for indirect processing.

Port Complex Ruse J.S.Co. operates four terminals – Ruse – East, Ruse – Center, Tutrakan and passenger terminal Silistra. The total area of port terminal Ruse – East is 825 533 sq.m. and the area of port terminal Tutrakan is 4 414 sq.m. In total, the two terminals have 15 freight berths. The freight terminals, operated by Port Complex Ruse J.S.Co. have open and closed storage and warehousing facilities sufficient to serve the entire cargo flow that passes through them.

According to the answer given by the experts in Executive Agency for Exploration and Maintenance of the Danube River, it is clear that their special purpose port has open and closed storage area. The port is specialized for stay and repair of vessels, mooring, supply of water and electricity, hydrotechnical research and construction.

Port terminal Lom, operated by Port Invest Ltd., is under concession for 35 years. The total area of the port is 371 129 sq.m. and it has 13 berths. The port has rail and road connection with the hinterland. The port has open and closed storage and warehousing facilities.

The following table summarizes the data about the storage and warehousing facilities of the Danube river ports in Bulgaria.

**Table 2: Available storage areas in the river port terminals in Bulgaria**

Terminal	Area, sq.m.	Open storage, sq.m.	Closed storage, sq.m.
<i>BPICo Branch-Territorial Directorate Lom – total for the ports of national importance</i>	<b>570 336</b>		
<b>Port Invest Ltd. (terminal Lom)</b>	371 129	117 921	8 343
<b>Vidin - South</b>	48 000	18 000	
<b>Oryahovo *</b>	14 590	4 400	962
<b>Vidin - North*</b>	101 617	10 000	3 131

Terminal	Area, sq.m.	Open storage, sq.m.	Closed storage, sq.m.
<i>Ports of regional importance!</i>			
<b>Ferry Complex Oryahovo</b>	12 300	10 000	
<b>DDF Dunim Kozloduy</b>	n/a	7 000	
<b>Ekopetroleum Vidin (Taifun)</b>	n/a		7200 m <sup>3</sup> tanks
<b>Ro-Ro SOMAT Vidin*</b>	n/a	42 000	
<b>Free Zone Vidin*</b>	n/a		400 m <sup>3</sup> tanks
<b>DDF Badin Vidin*</b>	n/a	6350	
<b>BPICo Branch-Territorial Directorate Ruse – total for the ports of national importance</b>	<b>1 310 200</b>		
<b>DF Istar AD (Svishtov) difference between response to questionnaire and official data</b>	81 917	(22 800) 73 220	6 100
<b>Port Complex Ruse (Ruse-East)</b>	825 533	190 500	15 800
<b>BPICo (Ruse-West)*</b>	118 396	27 600	8 900
<b>Port Complex Ruse (Tutrakan)</b>	4 414	2 500	
<b>Somovit *</b>	28 300	9 700	3 375
<i>Ports of regional importance!</i>			
<b>Svishtov Sviloza</b>	15 882	7 470 (11 000)	
<b>Executive Agency for Exploration and Maintenance of the Danube River</b>	21 633	n/a	
<b>ADM Silistra</b>	21 000		5160 m <sup>3</sup> (silos)
<b>Silistra Polaris*</b>	n/a	5 600	
<b>Silistra Lesil*</b>	n/a	18 000	
<b>Oil terminal Arbis*</b>	n/a		5800 (tanks)
<b>Port Bulmarket*</b>	92 000	15 000	1 440m <sup>2</sup> + 9798 m <sup>3</sup> silos
<b>Free Zone Ruse*</b>	370 235	20 000	40 000 m <sup>3</sup> (tanks)
<b>WQ*</b>	n/a	1500	
<b>Danube dredging fleet Ruse*</b>	n/a	10 000	
<b>TPP Sviloza*</b>	n/a	15 250	
<b>Belene*</b>	n/a	21 200	

Source:

[https://www.mtitc.government.bg/sites/default/files/integrated\\_transport\\_strategy\\_2030\\_bg.pdf](https://www.mtitc.government.bg/sites/default/files/integrated_transport_strategy_2030_bg.pdf);  
[www.tpp-sviloza.bg](http://www.tpp-sviloza.bg); [www.bgports.bg](http://www.bgports.bg)

It is obvious that **Ruse-East has the largest territory** and the largest storage area. Port of Lom is the second largest port. All ports in the area of Lom have open storage area in the amount of 216 000 sq.m. Closed storage area is a little more than 12 000 sq.m. without

the volume of the tanks. For the territorial scope of Ruse the open storage area is 350 000 sq.m., the closed storage area is more than 34 000 sq.m. without the silos and tanks.

### 5.1.3 Handling facilities and devices available

The responses to the question about the available handling facilities and devices can be summarized as follows:

Port terminal Svishtov owns one Ro-Ro ramp, 11 gantry cranes and one floating crane. The terminal has 8 berths and is able to transfer the cargo to rail or road transport.

Port terminal Svishtov Sviloza owns one 10 t gantry crane. It also has 1 berth and is able to transfer the cargo to rail or road transport

Ports, managed by BPICo Branch-Territorial Directorate Ruse, are equipped with conveyor belts /property of the heating plant in Ruse/; pneumatic equipment; ro-ro ramps; luffing/slewing crane and floating crane.

The port, which is owned and operated by Executive Agency for Exploration and Maintenance of the Danube River is a port with special status at 491 km in the Bulgarian section of the Danube. The total area of the port is 21 633 sq.m. and it has 4 berths. The port is not used for cargo handling and passenger services. It has no rail or road connection to the hinterland. In order to carry out its main activities, the port is equipped with one 3.2 t stationary electrohydraulic crane, one 2 t stationary crane and one electric telfer.

Port Complex Ruse J.S.Co. states that the terminals, which it operates, are equipped with the following handling facilities and devices: conveyor belts, pneumatic equipment, luffing/slewing cranes and a floating crane. The terminals have 37 berths and have rail and road connection to the hinterland.

Port terminal Lom has the following handling facilities and devices: gantry crane, mobile crane and other devices, owned by the port operator. Port ADM Silistra owns only conveyor belts. There is only road connection to the hinterland.

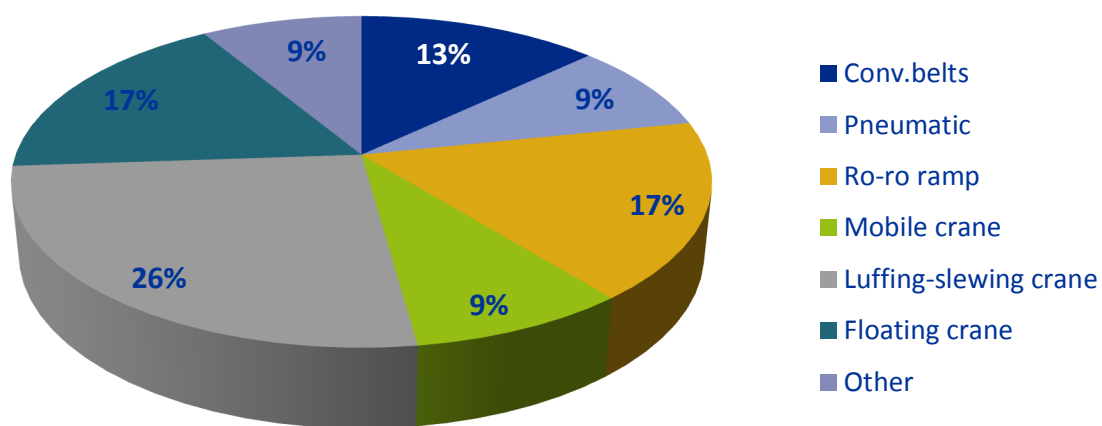
The handling facilities and devices that are present at the terminals, which fall in the area of BPICo Branch-Territorial Directorate Lom are: ro-ro ramp, gantry crane, floating and mobile crane, vehicle weighing scales. There is rail and road access to the terminals from the hinterland.

**Table № 3 Handling facilities and devices available in the river ports in Bulgaria**

No	Type	Number of responses
1.	Conveyor belts	3
2.	Pneumatic equipment	2
3.	Ro-Ro ramp	4
4.	<i>Gantry crane</i>	4
5.	Mobile crane	2
6.	luffing/slewing crane	2 <b>(6)</b>
7.	Floating crane	4
8.	Others	2

The table shows that with regard to handling facilities, most of the positive responses are received for ro-ro ramps, gantry cranes and floating cranes (4 answers each). Having in mind the characteristics of the cranes in the ports along the Bulgarian section of the Danube, all cranes can be classified as luffing/slewing cranes. In this sense the responses can be summarized as 4+2=6. This is in compliance with the official data, which state that the cranes are the main equipment of the river ports in Bulgaria.

**Figure No 20 Distribution by type of equipment**

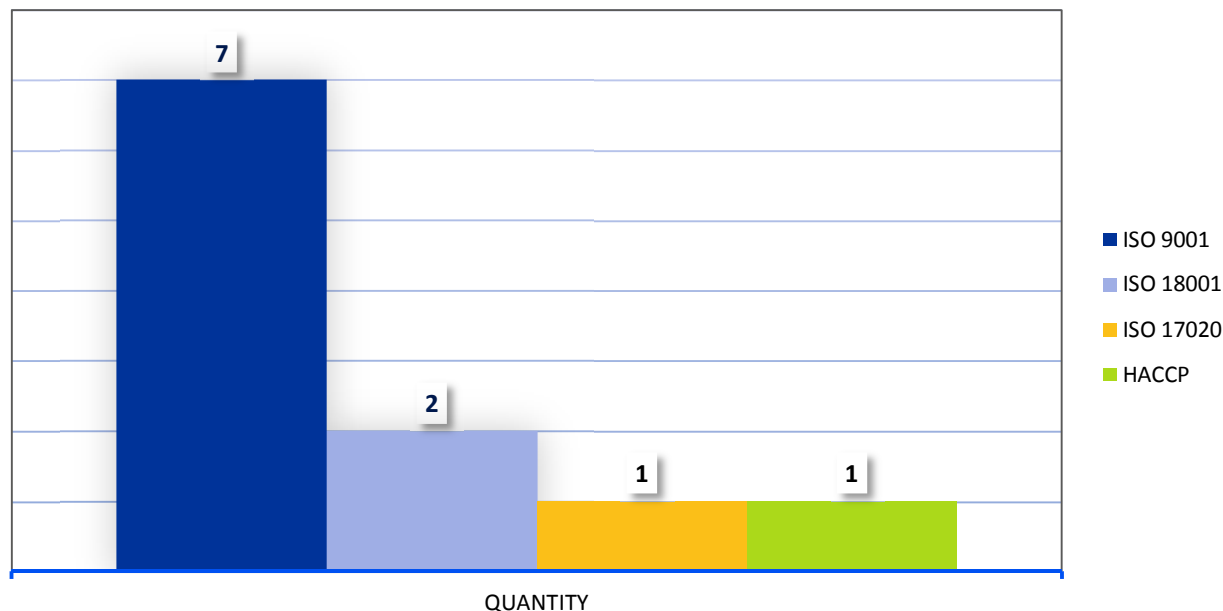


### 5.1.4 Quality certification

The answers of the respondents show that every one of them has quality certificate. The only respondent that doesn't own a certificate is the MTITC, but this is a consequence of its status as a ministry.

It should be noted, that according to the Bulgarian legislation and in particular Ordinance No 9 of 17 October 2013 on requirements for operational suitability of ports and specialized port facilities, art. 40. (1) *Operators providing port services under Art. 116, para. 2, item 2 and / or 3 of the MSIWPRBA must implement a certified quality management system according to EN ISO 9001: 2008 or equivalent.*

**Figure № 21 Quality certificates**



Port terminals Svishtov, Svishtov – Svilozha as well as the special-purpose port terminal of the EAEMDR own quality certificates as per the requirements of ISO 9001:2008.

Port ADM Silistra owns quality certificate ISO 9001:2015.

BPICo Branch-Territorial Directorate Lom owns the following certificates: OHSAS 18001-2007 and ISO 9001: 2015.

BPICo Branch-Territorial Directorates Ruse and Lom own the following certificates: OHSAS 18001-2007 and ISO 9001: 2015.

Port Complex Ruse J.S.Co. owns the following certificates: ISO 9001; ISO 17020; HACCP - Hazard Analysis & Critical Control Points.

Port terminal Lom owns the following certificates: ISO 9001/14001 and OHSAS 18001.

### 5.1.5 Port administrative processes conducted

With regard to the administrative processes that can be performed, the experts in Port terminal Svishtov point out renting of land, port platforms, office spaces, warehouses, equipment as available in their terminal.

The administrative processes that can be performed at port Svishtov – Svilozha are construction, maintaining & repairing of port infrastructure; preparation and implementation of security plans; issuing specific authorizations, licenses, certificates related to port activities and security control.

Port ADM Silistra performs the following administrative processes: construction, maintaining & repairing of port infrastructure; preparation and implementation of security plans and ship cargo control.

The activities that are performed by BPICo Branch-Territorial Directorate Lom are: construction, maintaining & repairing of port infrastructure; renting of land, port platforms, office spaces, warehouses, equipment; monitoring of vessels' movements and information systems; port and other dues collecting; provision of port services to port operators by the GIS system of BPICo.

The activities that are performed by BPICo Branch-Territorial Directorate Ruse are: construction, maintaining & repairing of port infrastructure; renting of land, port platforms, office spaces, warehouses, equipment; monitoring of the vessels' movement through the BULRIS information system.

MTITC does not perform directly port administrative processes, but observes agencies and companies in its structure for the proper implementation of the administrative processes. In this regard, the Ministry has responded positively to all the parts of this question, specifying that these processes are carried out by the administrations in its structure.

Executive Agency for Exploration and Maintenance of the Danube River did not respond to this question.

Port Complex Ruse J.S.Co. performs preparation and implementation of security plans.

In Port terminal Lom are performed the following processes: construction, maintaining & repairing of port infrastructure and preparation and implementation of security plans.

The following table represents the distribution of the answers according to the number of positive and negative responses for every administrative process.

**Table № 4 Distribution of positive and negative responses about the administrative processes conducted in the ports included in the survey**

No	Process	Yes	No
1.	Construction, maintaining & repairing of port infrastructure	6	2
2.	Renting (land, port platforms, office spaces, warehouses, equipment)	4	4
3.	Preparation and implementation of security plans	5	3
4.	Ship cargo control	2	6
5.	Monitoring ship movements and information systems	3	5
6.	Traffic management	2	6
	River	1	7

Nº	Process	Yes	No
	Rail	1	7
	Road	1	7
7.	Issuing specific authorizations, licenses, certificates related to port activities	3	5
8.	Other (specify) .....		

### 5.1.6. The services provided by the responding organizations in accordance with the existing facilities

Regarding the services provided by the respondents, most of them state that they can supply electricity and water to vessels. In addition, they provide the following information:

Except water and electricity shore supply, the main services provided by Port Svishtov are pilotage, transshipment, loading and offloading, cargo storage, forwarding services, etc. ([www.portsvishtov.com](http://www.portsvishtov.com)).

Port Svishtov – Sviloza performs also waste reception activities. It is mainly used for the handling and storage of coal used by the Thermal Power Plant. (<http://www.tpp-sviloza.bg/index.php/bg/services/terminal-svishtov>)

Port ADM Silistra provides the following services: transshipment; loading and unloading; cargo storage in closed storage facilities. The port is also specialized in reception of ship generated waste.

BPICo Branch-Territorial Directorate Lom doesn't provide services with regard to the handling facilities. The functions of the branch of BPICo. are described in detail in the introduction part of this report.

BPICo Branch-Territorial Directorate Ruse provides administrative and control services. The functions of the branch of BPICo. are described in detail in the introduction part of this report.

The functions of the branches are described in detail in the beginning of the report.

Port Complex Ruse J.S.Co. pointed out that it provides services relevant to the handling facilities available in the sphere of loading and unloading; berth allocation and port acceptance; cargo storage in open and covered warehouses. The terminals, operated by Port Complex Ruse J.S.Co., provide electricity and water supply, bunkering and logistic services as well.

Port terminal Lom is capable of providing services including loading and unloading; berth allocation and port acceptance. The port has ability to storage cargo, passing through the port and destined for the hinterland in the country. Water and electricity supply are also within the scope of its services.

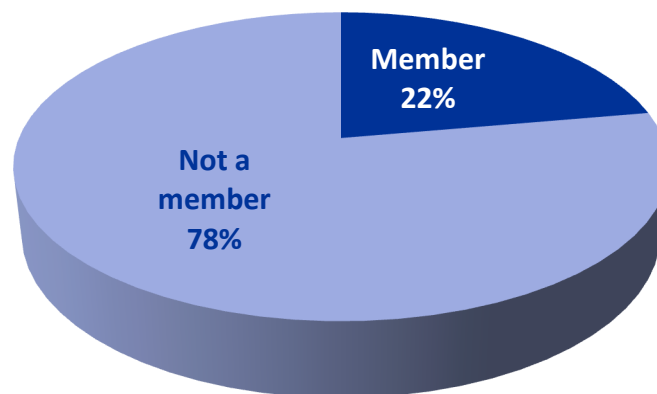
Executive Agency for Exploration and Maintenance of the Danube River states that provides the following services: supply of electricity and water to vessels; bunkering; bilge water disposal.

MTITC did not give any information on this question.

### 5.1.7 Participation in any consortium/association at national or international level

Most of the responds to this question point out that the ports and their port operators do not participate in any consortium/association at national or international level. These are the specific answers:

**Figure № 22 Participation in consortium/association**



Both BPICo Branch-Territorial Directorates – Ruse and Lom are not part of any consortium/association at national or international level as separate units. On the other hand BPICo participates in EFIP, ESPO and IAPH. Through its membership in such organizations, the company has the opportunity to exchange information on port law with the other members.

Port Complex Ruse J.S.Co. states that it participates in EFIP and in Bulgarian River Cluster "Danube". Through its membership in such organizations, the company has the opportunity to exchange information on port law with the other members.

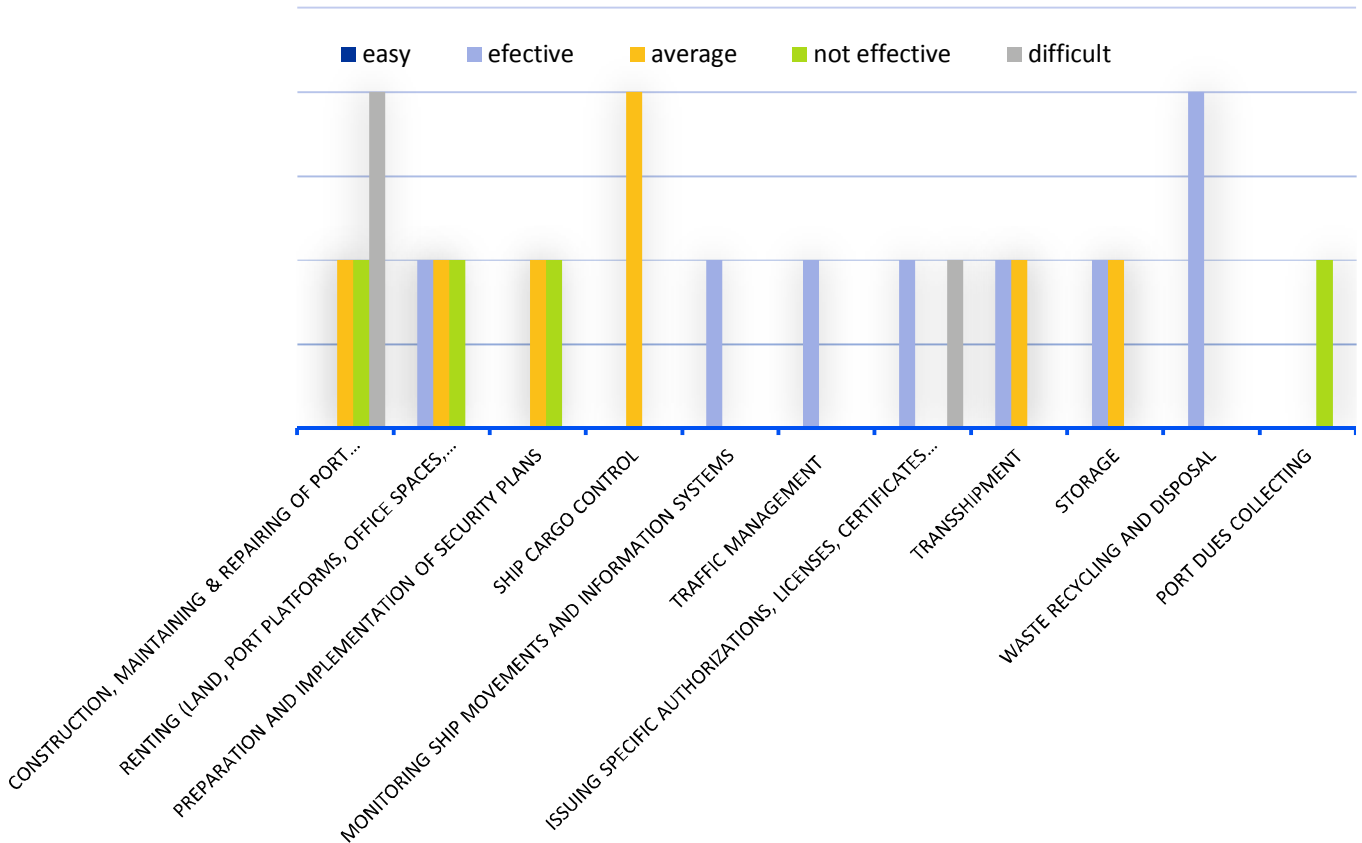
### 5.1.8 The complexity of the administrative port processes

The assessment of the complexity of the administrative processes is listed below, relating to the ratio between the volume of the requested documentation, the number of



staff involved and the time required for their execution, the responses received by the participants can be summarized as follows:

**Figure № 23 Complexity of the administrative port processes**



Port ADM Silistra gives **average** assessment to five of the administrative processes. For points 2, 5, 6, 7, 10 and 11, the respondent considers not relevant to its activity.

BPICo Branch-Territorial Directorate Lom considers as difficult the process of construction, maintaining & repairing of port infrastructure. The situation is similar with renting (land, port platforms, office spaces, warehouses, equipment), which is assessed as not effective. One of the main administrative processes performed by the experts in Lom is port dues collecting, which they assess with high complexity.

BPICo Branch-Territorial Directorate Ruse also considers the complexity of the construction, maintaining & repairing of port infrastructure as high. The experts in Ruse assess the process of renting (land, port platforms, office spaces, warehouses, equipment) as effective. They consider points 3-8 as not relevant for them.

The experts in MTITC consider as difficult the processes of construction, maintaining & repairing of port infrastructure and preparation and implementation of port security plans. They also assess as not effective the road traffic management process, put an average score

to the rail traffic management and consider effective the river traffic management. MTITC finds as effective the following processes: monitoring ship movements and information systems; issuing specific authorizations, licenses, certificates related to port activities; transshipment; storage; waste recycling and disposal.

Executive Agency for Exploration and Maintenance of the Danube River considers difficult the process of issuing specific authorizations, licenses, certificates related to port activities. They assess as effective the process of waste recycling and disposal. The Agency has put scores only to these two processes.

Port Complex Ruse J.S.Co. assesses as not effective the process of transshipment and as effective the storage process. These are the only processes assessed by the company.

Port Svishtov – Sviloza assesses as highly complex all of the administrative processes.

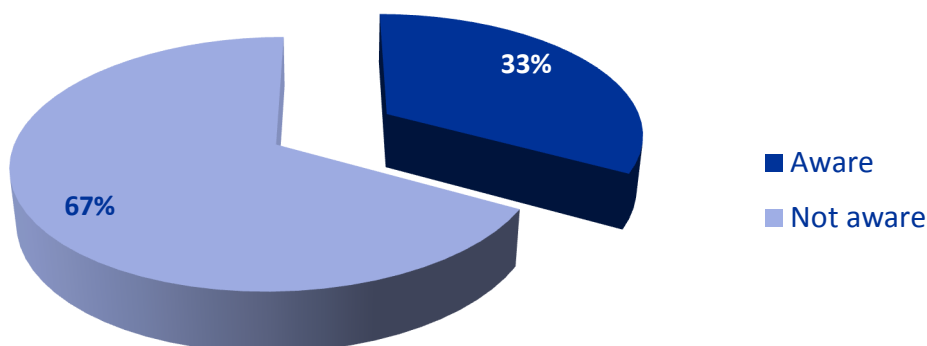
Port Invest ltd did not respond to this question.

DF Istar AD (Svishtov) has put average score to all of the administrative processes.

### 5.1.9 Port processes harmonization initiatives

Most of the participants responded that they are not aware about any initiatives for harmonization of port processes in the Danube ports. Only MTITC, and both BPICo Branches -Territorial Directorates – Ruse and Lom state that they have information about such initiatives.

**Figure № 24 Awareness of the respondents about port processes harmonization initiatives**



MTITC points out different projects, relating port processes harmonization like ADB Multiplatform Project, Watermode Project, Hint Project, DANTE Project, Danube Steam Project.

BPICo Branch-Territorial Directorates – Ruse and Lom mention some specific examples. There are several initiatives in BPICo related to the harmonization of port processes along the Danube. Mainly this is the maintenance of two systems, namely:

- System for Electronic Processing of Documents in Bulgarian River Ports for performing inbound and exit border control of ships entering or leaving the river ports in the country – Single Window.

- River Information System in the Bulgarian Stretch of Danube River - BulRIS.

- DANTE project.

At the same time, BPICo participates in various projects, which are also related to initiatives to harmonize the port processes along the Danube – except DAPhNE, also DBS Gateway, RIS COMEX, etc.).

Port Svishtov and Port Svishtov – Svilozha declare that they do not know about any initiatives to harmonize port processes in the Danube ports.

Port Complex Ruse J.S.Co. also claims the same – they are not aware about any initiatives to harmonize port processes in the Danube ports.

#### **5.1.10 The certificate validity for overall operation of the port**

All of the Port operators state that they have valid certificate for exploitation suitability (fitness) of the port and its duration is in accordance with the duration of the concession contract or other circumstances determining its duration:

Port Svishtov – Svilozha has certificate for exploitation suitability of the port until 14.11.2051.

The duration of the certificate for exploitation suitability of the port of Port ADM Silistra is one year.

The Special purpose port of Executive Agency for Exploration and Maintenance of the Danube River is in process of obtaining a certificate for exploitation of the port.

The terminals, operated by Port Complex Ruse J.S.Co., have certificate for exploitation of the port up to the granting of the terminals on concession /they are not currently on concession/.

Port Invest ltd. did not respond to this question. The term of the concession contract is for the period 2013 – 2048, so the certificate for operation of the port should be valid until 2048.

Port Svishtov is under concession since 2007 for 31 years. The certificate for operation of the port is valid until 2038.

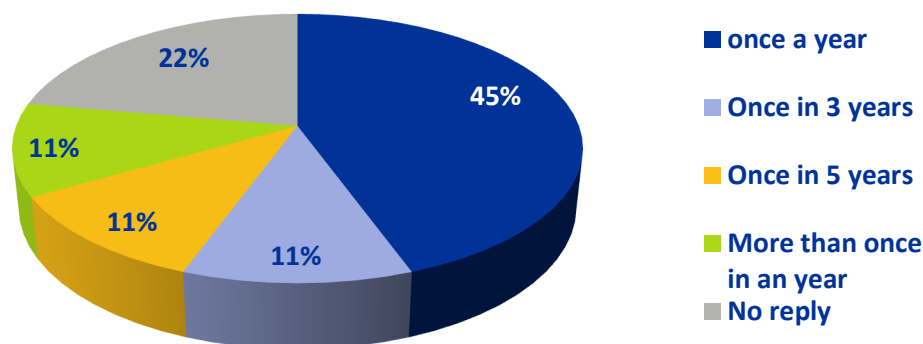
The port terminals that are in the territorial scope of BPICo Branch-Territorial Directorates – Ruse and Lom have different duration of their certificates for operational suitability of the port after they are concessioned. The biggest importance is the specific contents of the clauses of the concession contract. Currently, the longest duration of concession contract in Bulgaria can be 35 years. When a terminal is not yet granted under concession, but is in a process to be granted, the duration of the certificate for operation of the port is valid until the signing of the concession contract.

After the last amendments of the MSIWPRBA, MTITC no longer issues the certificates for overall operation of the port, as this became obligation of the Executive Agency Maritime Administration (EAMA). Nevertheless, the Ministry observes the concession contracts and the duration of the certificates for port operation. There is a specialized Directorate in MTITC - “Concessions and Control of the Activity of the Trade Associations and Government Enterprises” that has the obligation in this field of activity on behalf of the Minister.

### 5.1.11 Port audits

Port audits for proper operation of the ports in Bulgaria are carried out by qualified experts of EAMA. According to the Bulgarian legislation and the answers of the respondents the frequency of the audits for proper operation of the different ports is carried out as follows:

**Figure № 25 Frequency of port audits**



DF Istar AD states that Port Svishtov is audited once a year.

Port Svishtov – Sviloza is audited more than once a year.

Port ADM Silistra is audited once a year.

Port Invest ltd did not respond to the question.

The Terminals, operated by Port Complex Ruse J.S.Co., are audited once a year.

The experts in MTITC point out that the audits for proper operation of the ports are carried out at least once in 5 years and that other audits should be carried out within that period also. This is in accordance to art. 98 (1) of Ordinance 9/17.10.2013 on the requirements for operational suitability of ports..., which states, that audits for proper operation of the ports should be carried out:

1. at least once per 5 years – for ports and port terminals;
2. every year – for specialized port facilities.

The Ordinance regulates the execution of planned and targeted audits by EAMA, as the exact period of the audit is not specified.

All of the Branch-Territorial Directorates of BPICo do not have the authority to carry out audits for proper operation of the ports located in the Bulgarian section of the Danube. When port terminals operated by BPICo are audited for proper operation, the audits may be carried out once a year or when there is a change in circumstances.

### **5.1.12 Port services provided by the private sector**

BPICo Branch-Territorial Directorate Ruse is the only respondent that answered to this question. The activity of the private sector is not controlled by BPICo. and by the Branch specifically. The lack of requirement for communication with BPICo leads to a suggestion that private sector acts autonomously when deciding to invest in port infrastructure, thus making the process less bureaucratic, more flexible and quicker.

Port ADM Silistra is in exploitation for less than a year and can not express opinion about this question.

The lack of opinion on the question can be explained either with lack of observation by the respondents or with unwillingness to share their position.

It can be assumed that the state follows a policy of encouraging the participation of private business in port activities. Such a conclusion is based on the strategy to grant concessions for management of ports to private companies. The Strategy for Development of the Transport Infrastructure of the Republic of Bulgaria through the Mechanisms of Concession<sup>4</sup> provides for the involvement of private investors in the transport infrastructure development process in order to optimize transport activities and services of public interest and to provide additional financial resources through the use of resources, expertise and

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<sup>4</sup> [https://www.mtitc.government.bg/sites/default/files/strategia\\_concessii\\_24042013\\_1\\_1.pdf](https://www.mtitc.government.bg/sites/default/files/strategia_concessii_24042013_1_1.pdf)

know-how from the private sector against the obligation of the concessionaire to build and manage and maintain the object of concession or manage the service at its own risk.

Towards the end of 2017 there are already 7 river port terminals in Bulgaria given on concession. MTITC prepares another 4 port terminals of national importance for concession procedures. At the same time, private terminals are functioning and are developing quite well, which testifies for the good environment for private business initiatives.

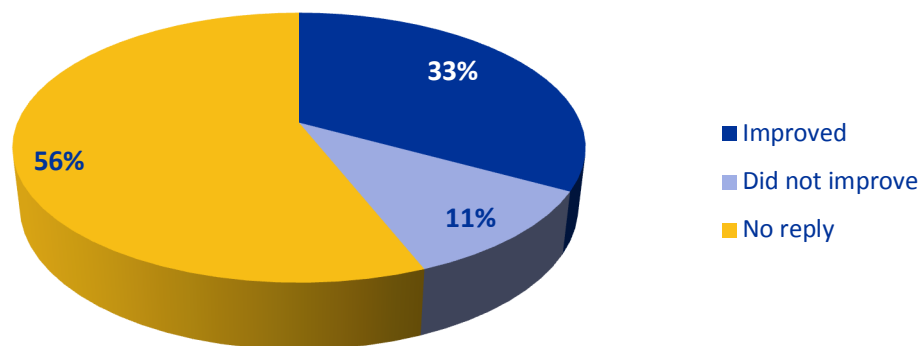
### 5.1.13 The improvements of port administrative processes during the past 5 years

Most of the respondents (56 %) did not answer to this question.

Port Complex Ruse J.S.Co. sees improvement in the internal business correspondence.

Because of the short exploitation period ADM Silistra does not respond to this question also.

**Figure № 26 Improvements of port administrative processes**



BPICo reports significant improvements in the administrative processes over the past five years and is continuing to act in this direction. The main improvement is the exchange of information and the issuing of documents related to the ship visits and the cargo handled. Thus, the administrative interaction between the various participants in the port market is greatly improved. As good examples can be pointed out:

- the presence of river information system – BulRIS;
- implementation of integrated information system for resources and information management in BPICo – facilitates the process of issuing invoices and analysis of the business, and hence favors the process of decision-making.

#### **5.1.14 Vessel audit by the corresponding administration**

MTITC, as well as BPICo Branch-Territorial Directorates – Ruse and Lom do not own vessels and this question is not relevant for them. Their main activity as port authorities is not focused on the ownership and management of vessels. Having in mind the control functions of EAMA, it is more capable of commenting in detail the information about vessel audit in Bulgaria.

Vessel audits are done by inspectors of EAMA, exercising state flag control on the basis of Ordinance No 11 on inspections of vessels and vessel owners.

According to Art. 37. (1) of the Ordinance, regular specific audit of ro-ro ferry or high-speed passenger vessel shall be carried out once per period of 12 months as well as after a change in circumstances. Art. 56. states that the validity of Community certificates issued to newly built vessels in accordance with the provisions of the Ordinance on technical requirements for inland waterway vessels shall be determined by EAMA and may not be longer than:

1. five years for passenger ships;
2. ten years for all other vessels.

The inspectors carry out periodical audits in order to confirm or extend the validity of the above certificates.

According to Port Complex Ruse J.S.Co. vessel audit is carried out every 3 years.

ADM Silistra didn't answer because of their short period of exploitation.

#### **5.1.15 Documents required when a vessel visit a port in the country**

Similarly to the comments to the previous question the low percentage of responses is determined by the irrelevance of the question to the activity of most of the respondents.

BPICo Branch-Territorial Directorate Ruse and ADM Silistra answer that the number of documents required when a vessel visits a port is between 5 and 10.

MTITC states a number between 17 and 23.

According to the Ordinance on the organization of the implementation of border passport control, customs, health, veterinary and phytosanitary control, as well as control of the means of transport in the ports of the Republic of Bulgaria, serving ships on international voyages, the documents for control of the river ports shall be submitted through the System for Electronic Processing of Documents in Bulgarian River Ports – Single Window. BPICo, develops, maintains and administers the System from July 2016. Over 30 ship agencies with about 100 end users work with the system. The system is developed in accordance with Directive 2010/65 / EU on reporting of ships arriving and departing from Member States' ports. Three months after its official launch, more than 2500 notifications and more than

2700 general statements have been submitted. The average time for processing a joint entry / exit declaration is between 15 and 30 minutes.

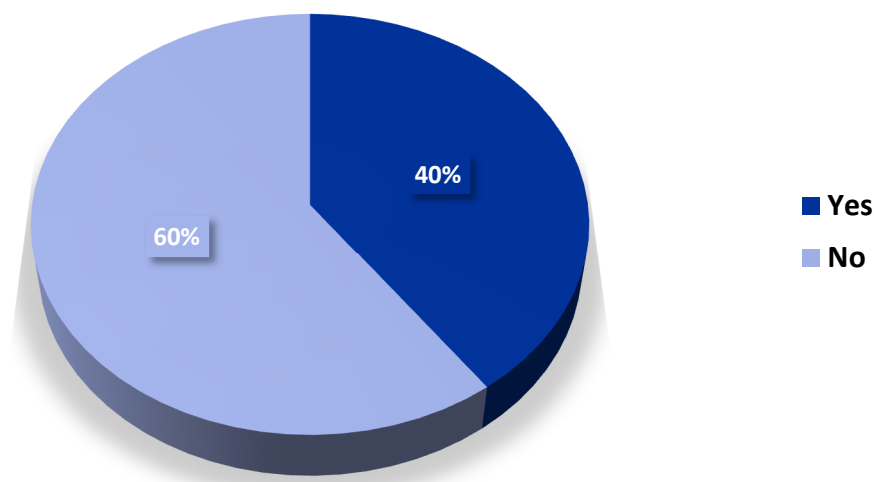
**The following specific documents are mentioned in the Ordinance:**

- Notification with additionally applied: 1. crew list; 2. passengers list; 3. cargo declaration for dangerous goods.
- At the moment of arrival of the vessel in a river port of the Republic of Bulgaria, the following documents shall be submitted in electronic format:
  1. general declaration - the document is generated by the System for Electronic Processing of Documents in Bulgarian River Ports;
  2. cargo declaration, bill of lading, manifest or other cargo document;
  3. declaration of ship's provisions;
  4. crew property declaration;
  5. declaration of absence of passengers without a ticket, weapons, narcotic drugs and other prohibited or restricted items, as well as live animals, including birds;
  6. information on the type and volume of the waste - result of shipping activity and ship cargo residues on board.

### 5.1.16 Electronic exchange of information with the port users relevant to operation of the port

To the question whether electronic exchange of information is used with the port users in connection with port operation, the responses received are the following:

**Figure № 27 Electronic exchange of information**





Port ADM Silistra does not use electronic exchange of information with the port users.

According to the answers of MTITC and BPICo Branch-Territorial Directorate Lom electronic exchange of information with the port users in connection with port operation is not used.

BPICo Branch-Territorial Directorate Ruse and Executive Agency for Exploration and Maintenance of the Danube River use electronic exchange of information with the port users in connection with port operation.

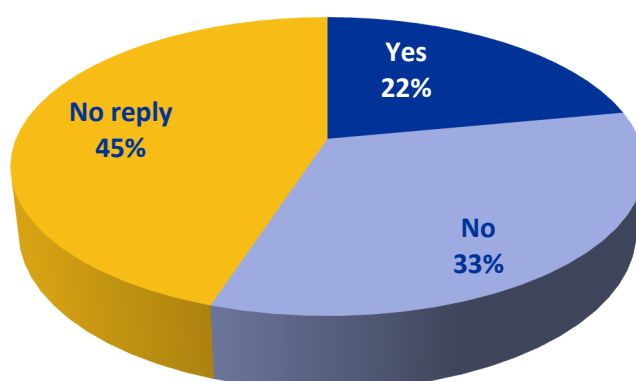
Port Invest ltd, Port Svishtov West and DF Istar AD did not respond to the question.

### 5.1.17 Electronic statistical and/or other data from port users

According to Ordinance No 919 of 08.12.2000 on the collection of statistical information about the activities of the port operators and the port and port facilities owners in the Republic of Bulgaria, any port operator carrying out port operations on the territory of the Republic of Bulgaria is obliged to submit statistical information to the official statistical information body for the country for the carried goods and passengers on inland waterways. The system for submission of this type of statistical information is online based and the information is submitted in real time.

**Port users are not obliged to submit statistical information!** Based on the initial documents submitted by the users in connection with the visit and processing of the vessels, the operators create statistics, which contain basic indicators of their activity - types of vessels, quantities and types of cargo, number of passengers, etc.

**Figure № 28 Submission of electronic statistical and/or other data from port users**



The system for generating and processing statistical information about the processed quantity of cargo and number of passengers in the Bulgarian river and sea ports is PORTSTAT. Every port operator is obliged to submit statistical data on processed vessels, cargo and passengers through the terminal in real time for each month. The obtained data from all port operators is summarized, processed and sent to the National Statistical Institute, as well as to Eurostat.

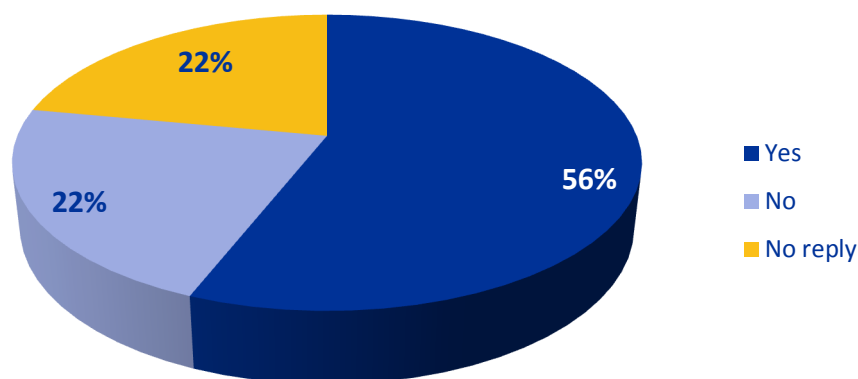
Port ADM Silistra does not receive electronical statistical data from port users, the data is received only on paper.

BPICo receives electronical statistical and other data, related to shipping on the Danube. Although the information is obtained electronically, it is also received on paper, which complicates the implementation of work processes at port terminals in general and requires additional and unnecessary work.

### 5.1.18 Meetings with relevant institutions to the port activity and with port users

BPICo Branch-Territorial Directorates – Ruse and Lom regularly take part in meetings with other institutions regarding port activities and users. They also participate in various conferences, symposia and stakeholder meetings. Most of the times BPICo is the initiator of such meetings.

**Figure № 29 Regular meetings with institutions**



Representatives of ADM Silistra, DF Istar (Svishtov) and Svishtov-Svilozha have regular meetings with other institutions on port activities and users. They also participate in various conferences, symposia and stakeholder meetings.

MTITC and Executive Agency for Exploration and Maintenance of the Danube River do not have regular meetings with relevant institutions and port users regarding port activities.

#### **5.1.19 Time consuming administrative procedures**

As one of the main time consuming administrative procedures in BPICo Branch-Territorial Directorate Ruse is the organizing and conducting public procurements procedures for the implementation of the annual investment program. BPICo Branch-Territorial Directorate Lom responds that such procedures are: various administrative procedures, internal rules for the organization of the business processes in BPICo and operational procedures for the quality standards in which the company is certified.

The other 7 respondents did not provide information about this issue.

#### **5.1.20 Administrative procedures considered for elimination**

No feedback was received on this issue. Only ADM Silistra states that there are not enough observations due its short working period.

#### **5.1.21 Suggestions/Proposals/Comments regarding the administrative port processes and future directions for development and harmonization along the Danube ports**

When responding to the questionnaire, no respondent made any suggestions or comments on the matter.

#### **5.1.22 Conclusions**

Based on the above study and analysis of the received answers, it can be concluded that a good coverage has been achieved in terms of the number and location of respondents from the group of port authorities and administrations in Bulgaria. Of particular importance are the data and opinions of Port Invest ltd and Port Complex Ruse J.S.Co. as they are operators of the biggest freight terminals on Danube – Lom and Ruse – East. The views of the private port terminals are few. The opinions of MTITC and BPICo present point of view of the authorities, which is of key importance to this part of the report.

With regard to the purpose of the study: **to determine what aspects need to be simplified, modified and removed** in order to increase efficiency and reduce bureaucracy in connection with administrative processes in ports, the following conclusions can be made:

- The attitude is rather positive in relation to administrative processes in river ports;

- The lack of views on the improvement of administrative processes by port operators can be interpreted as a lack of development of internal port procedures. Measures could be taken both by operators and by the institutions imposing rules on the functioning of ports.

- The institutions (MTITC, BPICo, EAMA) could take measures to:

- ❖ reduce the administrative burden of the procedures for investments in port infrastructure and port facilities;
- ❖ promote the electronic exchange of information;
- ❖ support the cooperation between the ports in the territory of the country and their inclusion in consortiums and / or organizations.

The relative autonomy and independence of individual institutions and organizations on the other hand leads to the establishment of administrative procedures that meet their own requirements.

Even if the reason for modifying / eliminating a procedure is highlighted, the change is likely to occur relatively slowly or not at all, due to the opinion of the implementing organization that the relevant procedure is necessary or legally regulated.

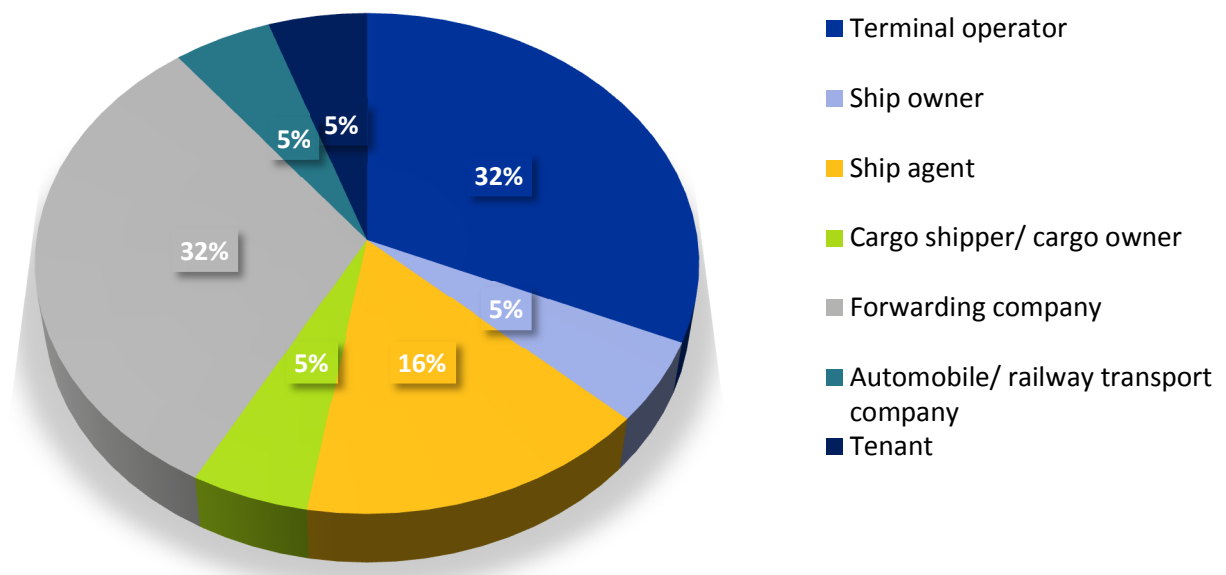
## 5.2. Research conducted on port users – data obtained from the ports under survey

**Number of filled in questionnaires: 13 (19%)**

**Rate of non-responses: 57 (81 %)**

### 5.2.1. Port users categories

**Figure № 30 Port users categories**



The second part of the questionnaire was filled in by the following port users in their role of port operators, ship owners, ship agents,:

#### **I.Port operators – 6;**

Port Complex Ruse J.S.Co. (PC Ruse) is one of the respondents that filled both parts of the questionnaire – part A and part B. Its answers are presented from the point of view of a port operator of Ruse – East port terminal.

Except as port owner, ADM Bulgaria Logistics ltd. filled part B of the questionnaire as port operator of port ADM Sillistra.

The same is the situation with Port Svishtov West AD – port operator of Svishtov – Svisoza – filled in both parts of the document.

Dredging fleet Istar AD – operator as per a concession contract of terminal Svishtov also filled both parts of the questionnaire.

Port terminal Ruse – free zone is operated by Free Zone Ruse JSCo. and as the previous operators filled both parts of the questionnaire.

Port Invest Ltd. is an operator of port terminal Lom as a concessionaire. Along with this, Port Invest ltd. is a shipowner and ship agent.

## **II. Forwarding companies - 6;**

**Hermes Lind ltd.** is a forwarding company of grains and other cargo and works at port terminal Ruse – East. Hermes Lind ltd<sup>5</sup> is established in 2008 with head office in Ruse. Its main activities are related to:

- loading and unloading of bulk and general cargo at ports in Ruse, Svishtov, Lom, Vidin;
- river and road transport;
- customs services;
- storage of goods.

Another forwarding company, which works at port terminal Ruse – east is **Rubicon shipping ltd.** (<http://rubicon-bg.com>). The forwarder states that works in port terminals Svishtov and Nikopol. Rubicon Shipping ltd. is forwarder of bulk cargo – grain, feed, ores and concentrates along the Danube, provides logistics solutions for shipments of oversized and heavy loads. At the same time, it offers complex solutions in the field of transport and construction of wind generators in Bulgaria.

**Despred AD Ruse** works as forwarder at port terminal Ruse – East.

Forwarding company **Holleman Bulgaria ltd.** (<http://www.holleman.bg/>) also works at port terminal Ruse – East. The company is the leading carrier of oversized goods on the Danube. Besides freight forwarder, the company is also a shipping agent, a cargo owner and a road transport company. Especially for the purpose of river transport and logistics of agricultural machinery, the company owns warehouses in the port of Ruse - East and Deggendorf, Germany. In its website the company states that the total storage area for 2012 is 45 500 sq.m. and for 2013 is more than 50 000 sq.m. For the needs of its customers, the company has also build its own warehouse area of 21 000 sq.m., which offers more flexible working hours and better service.

**„Donau Transit“ ltd.** (<http://donau.bg>) is established in 1992 and is the first Bulgarian freight forwarder specialised in river, river-sea and combined transport via the Bulgarian ports. The Company has an average turnover of about 600 000 tonnes of cargo per year and offers the full package of forwarding services in the field of the waterway, road and combined transport including chartering, freight forwarding, arrangement of port cargo-

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<sup>5</sup> Source: [https://www.informator.bg/cgi-bin/index.pl?\\_state=Info&ID=5405](https://www.informator.bg/cgi-bin/index.pl?_state=Info&ID=5405)

handling operations, cargo storage, customs broking, cargo-insurance broking and other transport-related services.

**Werta ltd.** ([www.werta.net](http://www.werta.net)) is a forwarding company that works at port terminal Ruse – East. The head office of the company is in Sofia and its activity is related to international and domestic freight forwarding, regular road import and export from and to Europe, air transport, warehousing and logistics, customs agency.

### **III. Ship agents – 3**

Andrea Shipping and Trading ltd. is a ship agent that works at port terminal Ruse – East.

Ship agents are also Holleman Bulgaria ltd. and Port Invest ltd.

### **IV. Shipowners - 1**

The only respondent that is shipowner is Port Invest ltd.

### **V. Cargo shipper/cargo owner – 1**

Holleman Bulgaria ltd is cargo shipper.

The area of geographical coverage according to the head offices of respondents is the following:

**Ruse** – PC Ruse, Free zone Ruse, Donau Transit ltd., Despred AD Ruse, Holleman Bulgaria ltd., Hermes Lind ltd. Rubicon Shipping ltd., Andreea Shipping and Trading ltd.;

**Silistra** – ADM Bulgaria Logistics ltd.;

**Svishtov** – DF Istar AD, Port Svishtov West AD;

**Lom** – Port Invest ltd.;

**Sofia** – Werta ltd. /for Port Ruse/.

The largest is the number of respondents from Rousse - 70%.

With regard to representativeness in terms of handled cargo and in view of published information, PC Ruse (operator of freight terminals Ruse – East and Tutrakan) handles about 700 000 t per year.

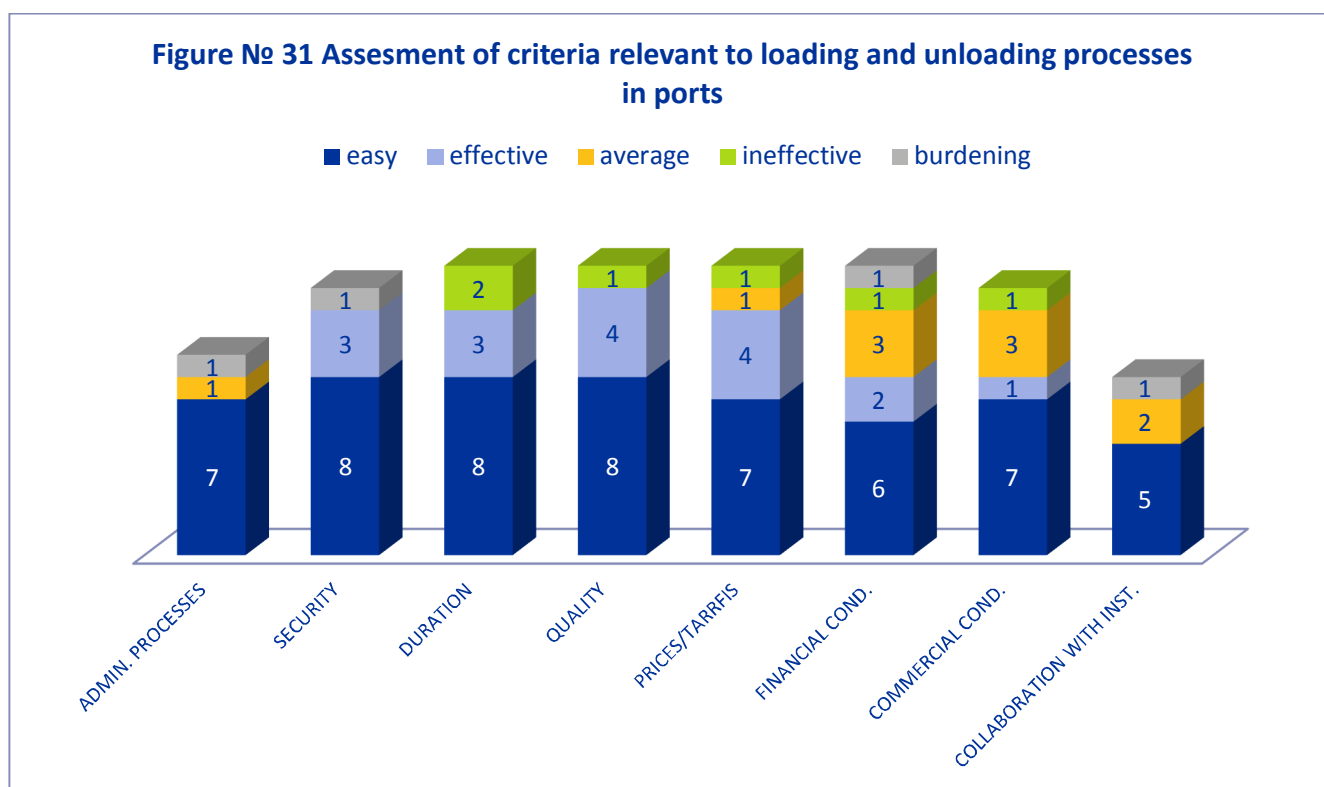
According to the planned yearly cargo quantities, the concessionaire of terminal Lom – Port Invest ltd. expected 480 000 t of cargo handled per year, but the actual data shows that in 2015 the cargo handled was 521 000 t. There is no available information about ADM Silistra. The data about DF Istar AD shows that in 2015 the cargo handled was 800 000 t. It should be noted that DF Istar handles mainly inert materials, which are connected with its main activity. This cargo type is the largest part of the cargo handled by the company.



### 5.2.2. Loading and unloading

The summarized results include responses on different version of the questions before and after the change in the questionnaire. The change represents the different assessment scale (it is **“inverted”**) – before the change “5” meant most effective and after the change - not effective. The results are transformed and analyzed according to the latest version of the questionnaire. Not all points are assessed by the respondents, therefore the number of responses for them is different.

The assessments of the effectiveness of loading and unloading by the port users is the following:



For point 1 **Administrative procedures** in ports, the received responses are – 7 easy and 1 average. The only negative assessment is of Despred AD Ruse.

**Safety and security** is assessed by 67 % (8) of the respondents as easy and 25 % as effective. The positive responses in total are 92 %. Again, Despred AD Ruse sets the only negative response. Probably this company has negative experience in working on a river port and believes that the activities need to be improved.

For point 3 **Duration**, the assessments again are in the scale of easy and effective 92 % (11). Two of the respondents consider this process as not effective – Despred AD Ruse and Donau Transit ltd.

The **Quality** is assessed as easy and effective again by 92 % of all respondents. One of the respondents thinks that it is not good (Despred AD Ruse).

The **Tariffs** and prices for loading and unloading received mainly positive assessments – 7 maximal assessments and 4 assessments with one point lower, but still positive. One of the respondents considers them as averagely effective (Donau Transit ltd.) and one gives lowest negative score (Despred AD Ruse).

The assessments of the **Fiscal and Commercial legislation conditions** varies depending on the specific experience of the respondents. Again the general positive attitude prevails, as only single respondents gave extreme negative opinions.

Concerning **collaboration between institutions** such as customs, port operator, port administration and others only 8 responses were received. Most of them - 63% give the highest positive score, two give an average score and one considers cooperation ineffective and difficult.

From all answers received, as a conclusion it can be stated that with few exceptions the port users are rather positive towards the loading and unloading processes. Improvements can be taken towards the legislation and collaboration between institutions in order to improve the port sector's image.

In its comments to the question, Donau Transit ltd. points out a specific problem: 20% VAT is charged on all cargo, including those originating outside the EU. In comparison, in Bulgarian seaports, all cargo is charged with zero-rate, including those originating in the EU.

Despred AD Ruse comments that the working organization of terminal Ruse – east is good, the staff team is good, but the results achieved by the various brigades are different in terms of loading and unloading standards.

### 5.2.3. Storage and warehousing

ADM Logistics did not answer to this question. Hermes Lind did not assess the Fiscal and Commercial legislation. The different assessment scales are analysed according to the latest version of the questionnaire.

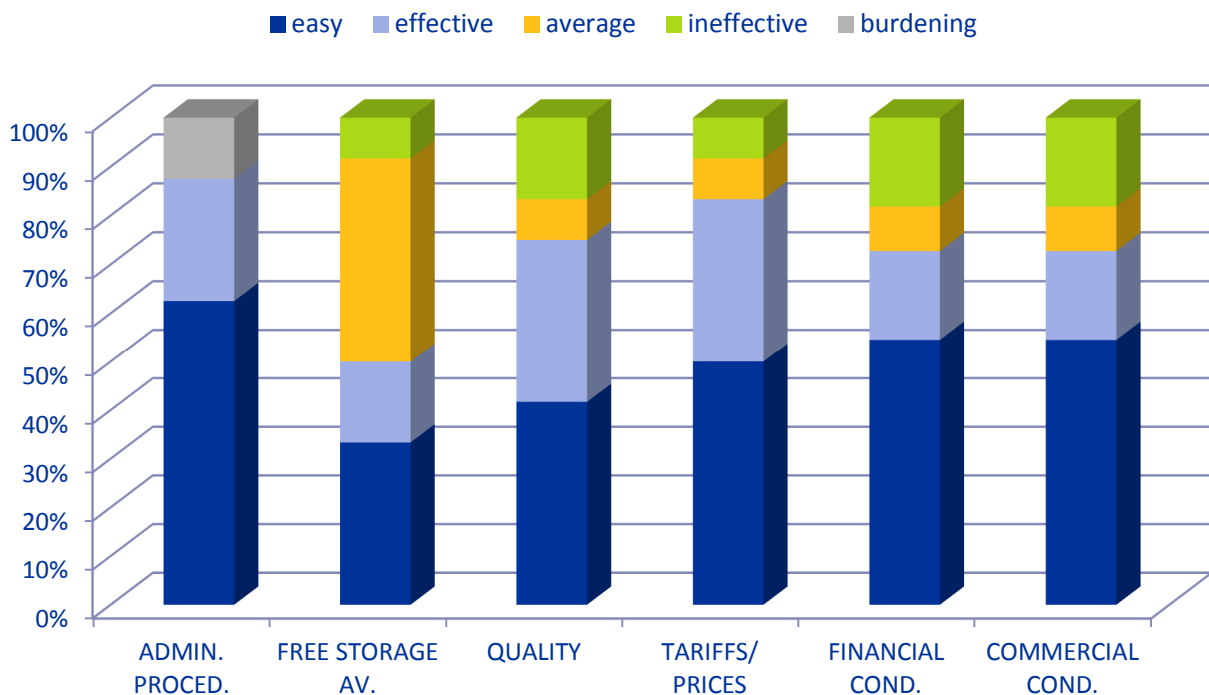
With 8 answers on point 1 **Administrative procedures** in port, 80 % are grouped in the positive scale with scores “1” and “2” (easy, effective).

The **Availability** of free storage turns out with small percentage of positive answers (40 % for scores 1 and 2). The average assessment prevails, which shows that the storage area is either not enough as a whole or there is a lack of storage area for particular goods. The port operators did not assess positively this criterion themselves, which proves the need of better organization of storage and warehousing and building of new storage areas, mostly for grain and goods that need closed storage.

The **Quality** of storage received 9 easy and effective assessments. Scores “3” and “4” were set by 3 of the respondents – Rubicon Shipping, Despred AD Ruse and Andreea Shipping and Trading ltd.

The **Tariffs** for storage and warehousing are generally assessed positively (10 responses with score 1 and 2) and two scores as average and not effective.

**Figure № 32 Assessment of criteria relevant to storage and warehousing in ports**



The assessments of **Fiscal and Commercial legislation** vary depending on the activity and the experience of the respondents.

The following comments were received in connection with established storage problems:

Port Invest ltd: difficulties arise during long-term keeping of cargo stored in open and closed warehouses.

Donau Transit: If the free storage term period is exceeded, the storage is charged retrospectively for that period.

Despred AD Ruse: the closed storage area is not enough.

### 5.2.4. Notice Process – (e.g. receiver, notify, port operator)

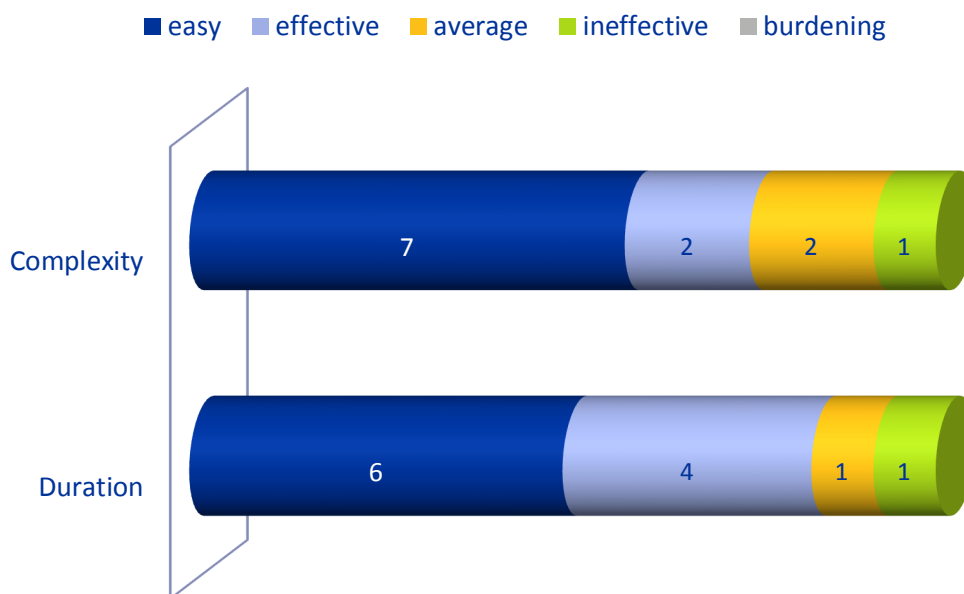
ADM Logistics did not respond to this question.

The Notice process in the river ports has a positive assessment. **Complexity of the procedure** receives 58 % easy scores and 17 % effective scores. The average scores are also 17 % and only one respondent set not effective score to this criterion.

The **Duration** of the process has 83 % positive scores (6 easy and 4 effective). One respondent considers the duration average and one – not effective.

Extremely negative assessments as difficult were not received. There are no described problems by the respondents.

**Figure № 33 Assessment of the Notice Process**



### 5.2.5. Berth Allocating & Port Acceptance Process

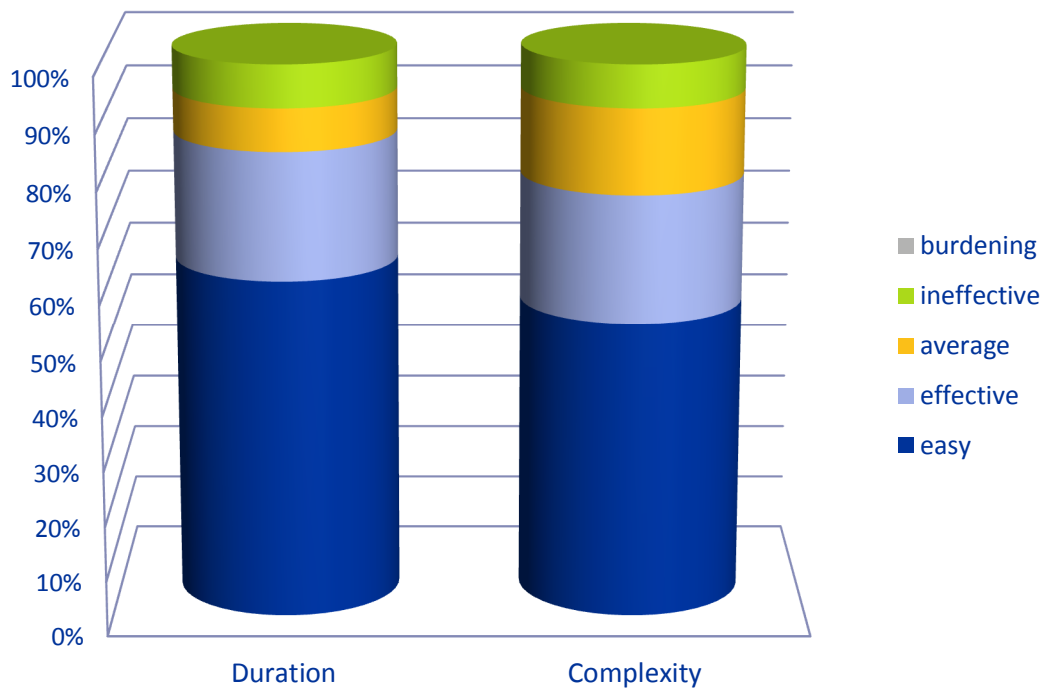
Berth allocation is a process managed by the port operator, taking into account the ships under processing, the availability of connection with rail or road transport, the order of submission of documents and the judgment of the responsible staff.

The assessments of this process are mostly positive and are presented in the following table and figure:

**Table № 5 Distribution of the responses about Berth Allocating & Port Acceptance Process**

Criterion	Easy	Effective	Average	Not effective	Difficult
Duration	8	3	1	1	
Complexity of the procedure	7	3	2	1	

**Figure № 34 Assessment of the Berth Allocating & Port Acceptance Process**



### 5.2.6. Survey Process

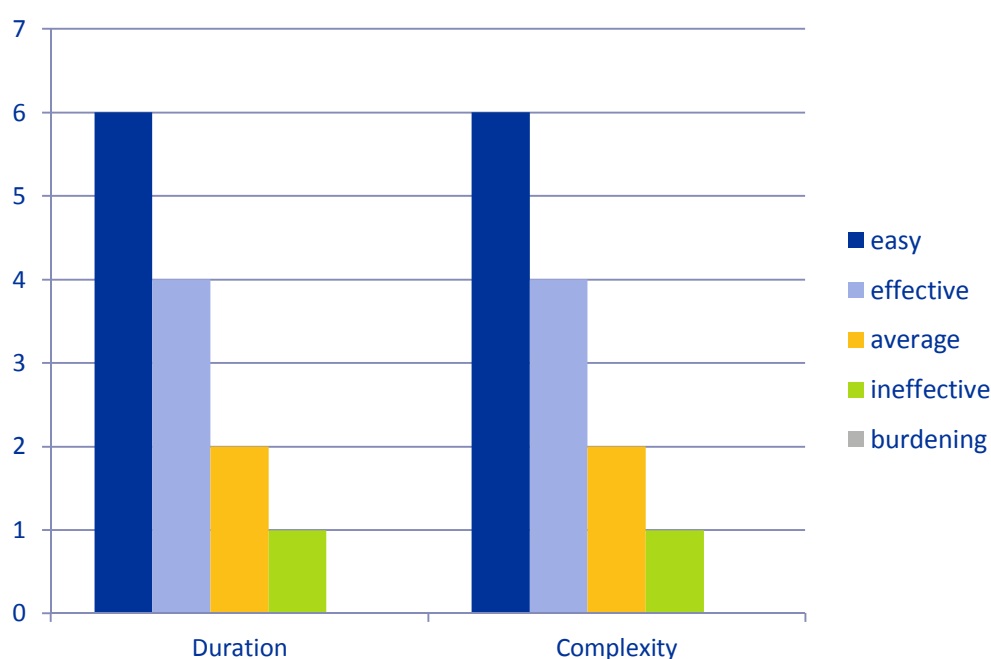
Typically, the (draft) survey is performed to determine the amount of bulk cargo in the ship by a particular technology. Companies working in the field of the break bulk cargo (machines, metals, equipment, etc.) should not have problems in this field.

ADM Logistics can't provide information about the survey process because of the short term of exploitation of port ADM Silistra. Currently the port operator and port terminal Ruse free zone, Holleman Bulgaria ltd, Hermes Lind state that they do not have difficulties with the survey process in the port.

**Table № 6 Distribution of the responses about the Survey Process**

Criterion	Easy	Effective	Average	Not effective	Difficult
Duration	6	4	2	1	
Complexity of the procedure	6	4	2	1	

**Figure № 35 Assessment of the Survey Process**



Despred AD Ruse assesses the survey process in port terminal Ruse-East as not effective with high duration and complexity of the procedure.

### **5.2.7. Ro-Ro services (loading and unloading of trucks, cars and other special vehicles and roll stocks to and from ships) – if applicable**

In total 7 of the respondents did not answer to this question as ro-ro services are not relevant to their activity. These are: Port Invest ltd. (port Lom), Hermes Lind ltd (forwarder of grain and other break bulk), Free zone Ruse (there is no ro-ro terminal), ADM Sillistra, Port Svishtov West and the forwarders Despred AD Ruse and Donau Transit ltd.

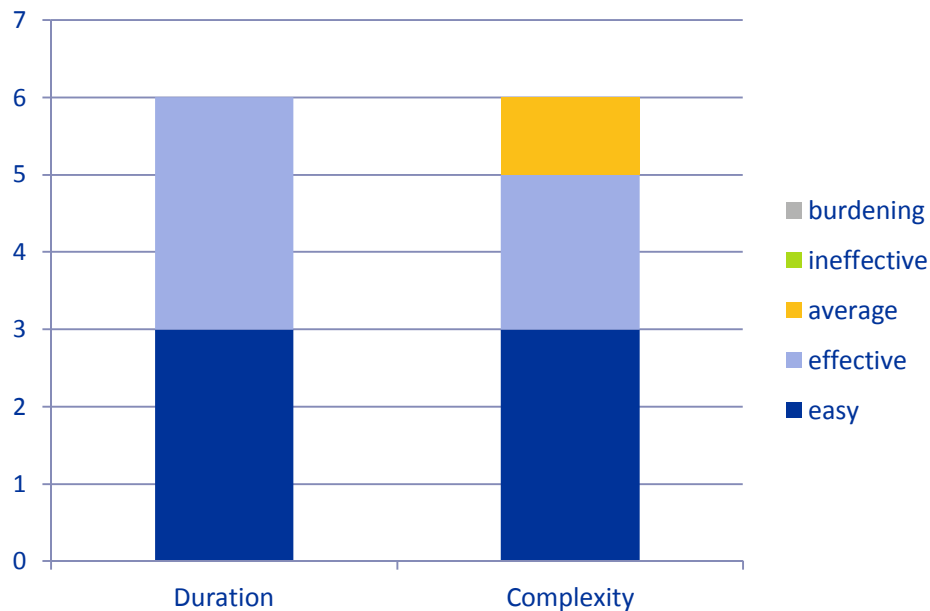


**Table № 7 Distribution of the responses about the Ro-Ro Sevices**

Criterion	Easy	Effective	Average	Not effective	Difficult
<b>Duration</b>	3	3			
<b>Complexity of the procedure</b>	3	2	1		

Only Rubicon Shipping puts average score to the complexity of the procedure of Ro-Ro services.

**Figure № 36 Assessment of the Ro-Ro services**



### 5.2.8. Port maneuvering process

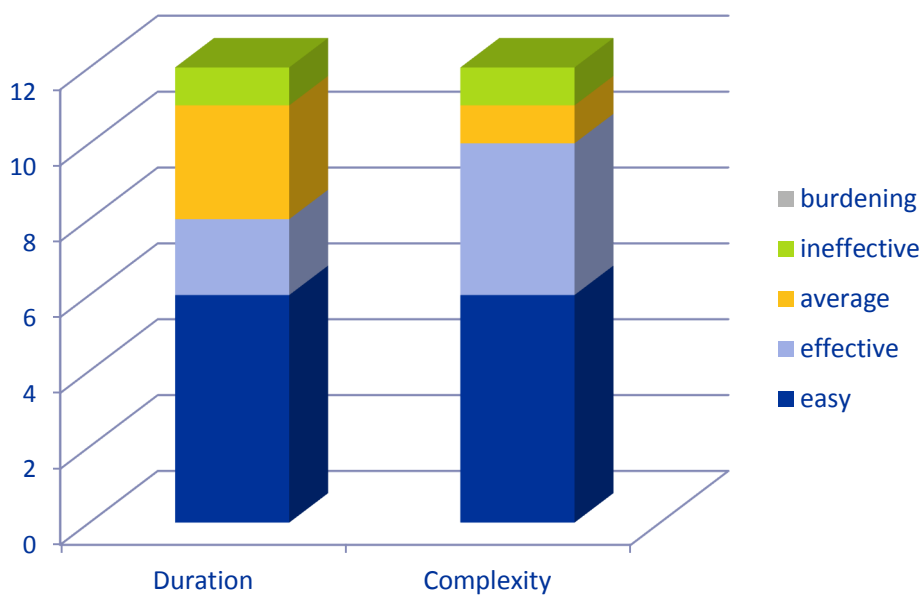
Port Svishtov West AD did not respond to the question.

The answers of PC Ruse, port terminal Ruse free zone, port terminal Lom, Werta ltd, Andreea Shipping and Trading ltd and Holleman Bulgaria ltd show that their experts do not have difficulties performing the administrative processes connected with port maneuvering process.

**Table № 8 Distribution of the responses about the port maneuvering process**

Criterion	Easy	Effective	Average	Not effective	Difficult
<b>Duration</b>	6	2	3	1	
<b>Complexity of the procedure</b>	6	4	1	1	

**Figure № 37 Assessment of the port maneuvering process**



The forwarding companies Hermes Lind ltd., Rubicon Shipping ltd. and Donau transit ltd. put average score to the duration of the maneuvering process in ports.

Despred AD Ruse considers the maneuvering process in port terminal Ruse – East as not effective with high duration and complexity of the procedure.

### 5.2.9. Ship to ship Transshipment – if applicable

Four of the respondents did not answer to this question – Free zone Ruse, DF Istar AD (Svishtov), Hermes Lind ltd. and ADM Logistics (Silistra).

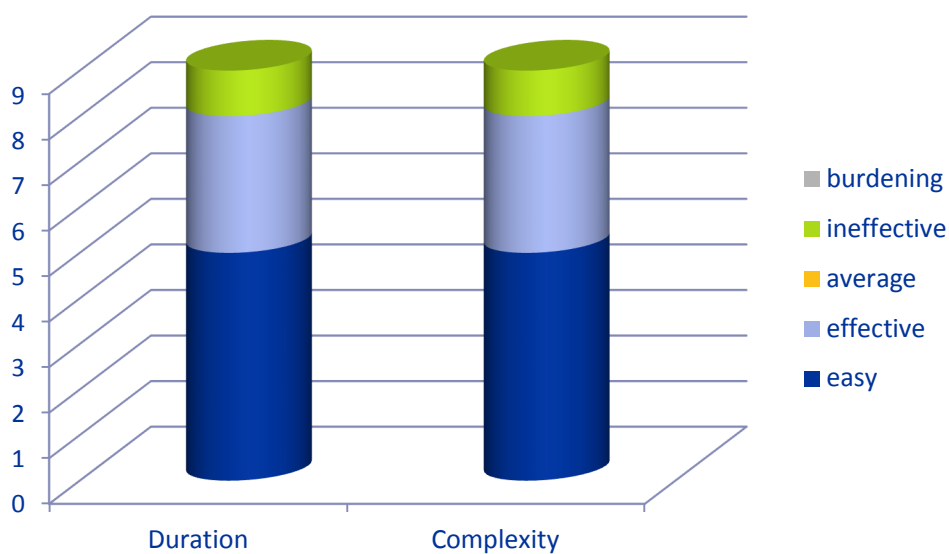
Despred AD Ruse is negative in its assessments again, giving score of 4 – not effective to the duration and complexity of the procedure of transshipment. Depsred makes the following comment: transshipment is only possible at appropriate levels of the Danube River.

All the other respondents assess this process as easy and effective, which shows rather positive attitude towards ship-to-ship transshipment.

**Table № 9 Distribution of the responses about the ship to ship transshipment process**

Criterion	Easy	Effective	Average	Not effective	Difficult
Duration	5	3		1	
Complexity of the procedure	5	3		1	

**Figure № 38 Assessment of the ship to ship transshipment process**



### 5.2.10. Audit

This one and the following questions deal with procedures related to the operation of ships.

To the question about the frequency of the vessel audit 9 of the respondents did not provide answers: Port Svishtov West, ADM Silistra, Hermes Lind, DF Istar, Donau Transit, Despred AD Ruse, Holleman Bulgaria, Rubicon Shipping and Werta ltd.

The received answers are:

- Once a year – 3 answers;
- More than once a year – 1 answer (once in 3 – 4 month);
- Once in 3 years – no such reponse
- Other – no such response

According to PC Ruse the vessels are audited once per year by the relevant administration in respect of the permission to sail.

So far, the practice in port terminal Ruse free zone shows that the vessels are audited once per year by the relevant administration in respect of the ship certificate.

In port terminal Lom vessels are also audited once per year by the relevant administration in respect of the permission to sail.

In its response Andreea Shipping and Trading ltd points out that the frequency the vessels audit by the relevant administration is done at least once per 3-4 months.

### **5.2.11. Documents**

On the question about the number of documents presented when the vessel visits the port, only three of the respondents provided their answers and the results are as follows:

- a. Less than 5 – no responses;
- b. Between 5 and 10 – 3 responses;
- c. Between 10 and 15 – no responses;
- d. Other – no responses;
- e. Not relevant/not responded – 10.

PC Ruse and Holleman Bulgaria ltd point out that when a vessel visits a port, it should present between 5 and 10 documents to the relevant authorities.

Andreea Shipping and Trading ltd states that during the visit of the vessel to the port of Ruse - East, port authorities request approximately 6-8 documents from the vessels.

### **5.2.12 Complexity of procedures**

The ship agent Andreea Shipping and Trading ltd states that it has difficulties working with the Romanian institutions. As specific reasons it stated: control requirements are not updated, slow reaction, a lack of prompt processing by the border police and customs, and sometimes by the Capitania.

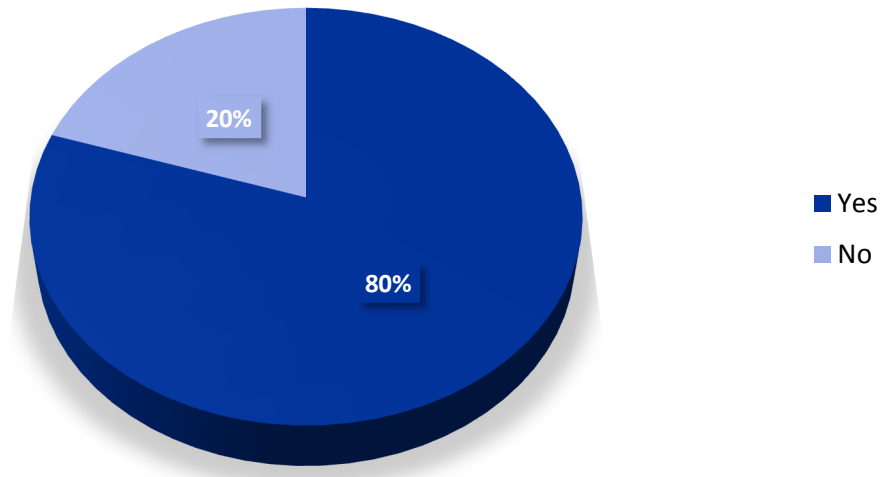
Donau Transit ltd. states that it has most difficulties with the administrative procedures in Ukraine.

The other 11 respondents did not answer to the question.

### **5.2.13. Electronic exchange of information**

Three respondents did not provide information whether they exchange information electronically with the relevant institutions in the ports. Eight of the respondents use electronic exchange of information with the institutions and two do not.

**Figure № 39 Electronic exchange of information**



Port terminal Ruse – free zone and Rubicon Shipping ltd. does not exchange electronically information with the relevant institutions in the ports.

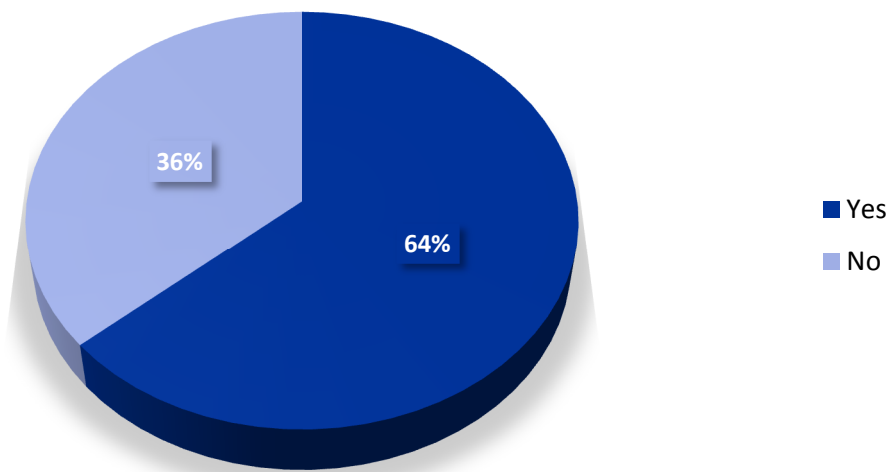
Port users, which use electronic exchanges, facilitate and shorten the time for the complete processing of a vessel from its mooring to its exit and obtaining a permit for sailing.

#### **5.2.14. Statistical and other data**

According to the Law on Statistics and according to Ordinance No 919 of 08.12.2000 on the collection of statistical information about the activities of the port operators and the port and port facilities owners in the Republic of Bulgaria, any port operator carrying out port operations on the territory of the Republic of Bulgaria is obliged to submit statistical information to the official statistical information body for the country for the carried goods and passengers on inland waterways. All other respondents are not legally obliged to submit statistical information about the cargo handled. The received responses to this questions are as follows:

- Yes - 7
- No - 4
- Not responded - 2

**Figure № 40 Submitting of statistical and other data**



As a port operator, PC Ruse is legally obliged to submit monthly statistical data for the cargo handled to EAMA. The operator also submits the data to all other relevant institutions.

Port terminal Svishtov – Sviloza submits electronically statistical information about the cargo handled to the body of statistics in the Republic of Bulgaria, monthly in real time.

Port terminal Ruse – free zone also submits electronically statistical and other data to the relevant institutions.

Almost all of the port terminals in the Bulgarian section of the Danube, which responded to the questionnaire, submit statistical and other data to the relevant institutions electronically.

The forwarding companies are not legally obliged to submit statistical data to the National Statistical Institute about the cargo handled.

Holleman Bulgaria submits electronically various data to the relevant institutions. Donau Transit ltd does not submit electronically statistical and other data to the relevant institutions.

Andreea Shipping and Trading ltd submits electronically statistical and other data to the relevant institutions.

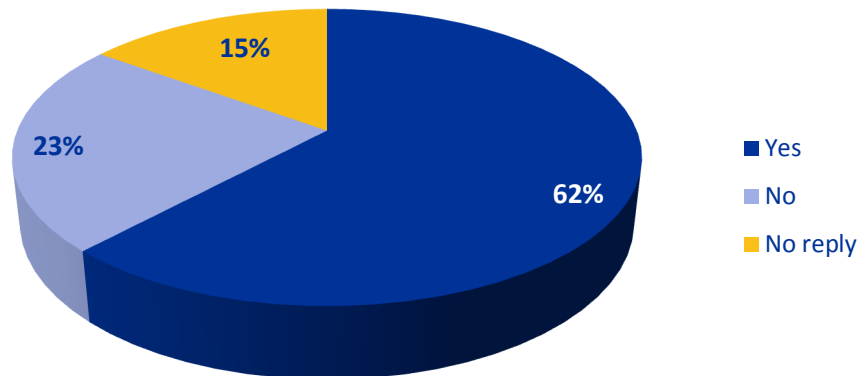
#### **5.2.15. Paper copies of the electronic data**

The use of paper copies of the electronic data is as follows:

- Yes – 8;
- No – 3;
- Not responded – 2 (Despred AD Ruse, ADM Silistra)



**Figure № 41 Use of paper copies of the electronic data**



DF Istar AD, PC Ruse, Port invest ltd., Svishtov – Sviloza and Free zone Ruse keep paper copies of the electronic data.

Forwarding companies Donau Transit, Holleman Bulgaria and Andreea Shipping and Trading also confirm that they keep paper copies of the electronic data.

Rubicon Shipping and Hermes Lind do not submit and do not keep copies of electronic data.

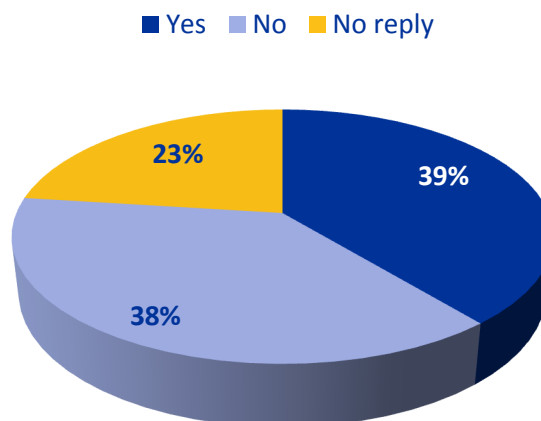
Although, the submission of statistical and other data to the respective administration electronically, the paper copies of the data also continue to be used in parallel.

#### **5.2.16. Meetings with relevant institutions**

Frequent meetings with the relevant institutions (Customs, EAMA, Border police, etc.) have only 50% of respondents (5). The other 50% do not have the practice of having meetings with the institutions.

- Yes – 5
- No – 5
- Not responded – 3 (PC Ruse, Port Invest ltd., ADM Silistra).

**Figure № 42 Meetings with relevant institutions**



Andreea Shipping and Trading ltd. Is one of the companies, which answers that it has no regular meetings with the competent institutions, related to port activities. They state that meetings with these institutions are only held, when major changes in the circumstances occur. During the rest of the time, the respondents adapt on in the process of the changes made by the responsible institutions.

### 5.2.17. Information considered useless

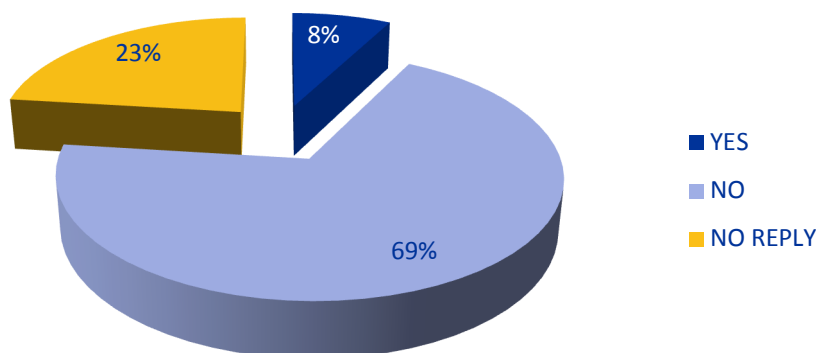
The following answers were received to the question “if there is information, which the users send to the relevant institutions and consider useless”:

- Answer “Yes” – 1;
- Answer “No” – 9;
- Not responded – 3 (ADM Silistra, Port Invest ltd., Werta ltd.)

69 % of the respondents do not consider the information they submit to the institutions useless.

As useless information, Andreea Shipping and Trading ltd considers the completion of declarations of the quantity of all types of waste on board the vessels upon arrival at the port of Ruse.

**Figure № 43 Information, considered useless**



### 5.2.18. Time consuming administrative procedures

On the question about time consuming administrative procedures, 10 of the respondents did not provide answers. The other three respondents give the following answers:

- Customs procedures – 2 answers;
- The procedure for obtaining certificate for operation of the port – 1 answer;
- the organization of work process – 1 answer.

Customs formalities are highlighted by experts at Hermes Lindt as most time consuming administrative procedures. The same difficulties are pointed out by Donau Transit ltd.

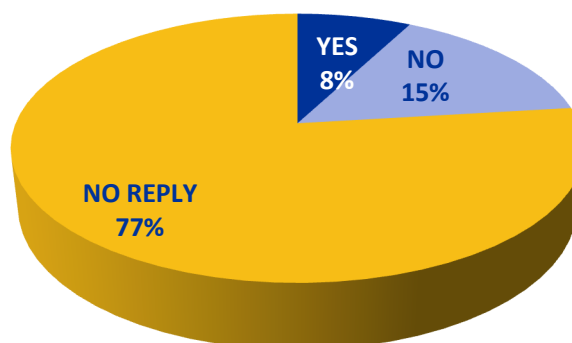
Free zone Ruse considers the procedure of obtaining new certificate for operational suitability of the port as the most time consuming.

The comment of PC Ruse about the organization of work process is not very clear. Probably /but not confirmed/ it concerns the division of responsibilities between employees of the organization.

### 5.2.19. Administrative procedures that should be eliminated

This question also has very low rate of feedback – 10 of the respondents did not provide their opinion.

**Figure № 44 Administrative procedures that should be eliminated**



Two of the respondents do not think that any procedures should be eliminated – Hermes Lind and Free zone Ruse.

The administrative processes that should be eliminated, according to Andreea Shipping and Trading ltd are:

- notification procedure for the declaration for temporary storage after its submission.
- Submission of General declaration for inbound cargo and general declaration for exit cargo – Bulgaria is not first border neither to Serbia nor to Ukraine, so it is pointless;
- Issuance of T2L and performing of inbound and exit revisions/ controls, when transporting Bulgarian cargo between two Bulgarian ports is totally meaningless and not in compliance with EU directives.

### **5.2.20 Suggestions /proposals/ comments**

None of the respondents made any suggestions, recommendations or comments on the questions asked.

### **5.2.21 Future directions for development and harmonization along the Danube ports**

The shipping agent Andreea Shipping and Trading ltd. is the only respondent, which provides recommendations on administrative port processes for the development and harmonization of Danube ports, mainly in the following directions:

- To connect the information systems of BulRIS and RoRIS, as well as the Romanian and Bulgarian Customs and Border Police, in order to eliminate duplication of documents like the general declarations;

- To ensure that Customs in different Bulgarian ports work under the same rules and regulations;
- To eliminate the differences in the required documents, whether the vessel is in the port of Ruse or in Lom.

### 5.2.22 Conclusions

Based on the survey conducted, it can be summarized that the largest cargo flow is realized in Ruse, Svishtov and Lom. Thus, the highest amount of administrative procedures for cargo handling and ship visits is performed in these regions.

In connection with the administrative procedures, which are the main subject of this report, the following shortcomings have been identified:

- Need for facilitating the public procurement procedures and administrative burdens in carrying out the repair and maintenance of port infrastructure in ports of national importance;
- Need to increase the publicity and access to information on initiatives to harmonize port administrative procedures along the Danube;
- Need to facilitate the procedure for issuing a new permit/certificate for overall operation of the port ;
- To eliminate the need of paper copies of the data submitted simultaneously and electronically to the relevant competent authority;
- Reduce the burden of customs procedures;
- As useless is pointed out the use of declarations for the quantity of all types of waste on board when vessels arrive at the port of Ruse;
- To consider the issue of charging 20% VAT on the processing of all cargo along the river, including those originating outside the EU. As a comparison, in our seaports, all cargo is charged with zero-rate, including those originating in the EU;
- There is a proposal to eliminate the submission of notification of declaration for temporary storage after its submission;
- There is a proposal to eliminate the submission of general declarations, because Bulgaria is not first border neither to Serbia nor to Ukraine.

Port users, which are agents, freight forwarders, transport companies, etc. are direct customers of the port operators. Significant parts of the obtained assessments refer to the port of Ruse and in particular the port terminal Ruse – East. Thus, the assessments received are mainly relevant to the operators' activities as port service providers. The main port services provided by them are:

- Loading and unloading from/to ships, automobiles and railway transport means;
- Cargo storage;
- Maneuvering services;
- Power and water supply to vessels, etc.;

The main weaknesses concerning the port activities, which are identified in the survey are:

- lack of covered storage areas, not enough free warehouses, unsatisfactory storage quality of goods;
- difficulties arise when the goods are stored in open and closed warehouses for a long time;
- the achieved results by the various brigades are different in terms of loading and unloading standards;
- when the free-storage term period is exceeded, the storage is charged retrospectively for that period.

## 6 Best practice examples

Best practices examples for the Republic of Bulgaria according to the analyzed information and taking into account the current situation in the country may be, but are not limited to, the following:

1. Functioning of the System for Electronic Processing of Documents in Bulgarian River Ports - **Single Window**. The system allows and requires the submission of electronic data for all vessels visiting the Bulgarian river terminals. The data is submitted by the ship agents and is observed and approved by EAMA, Customs, Border Police and BPICo. Access to data can also be given to other interested parties such as port operators, for example. The information is received in real time, immediately. It is believed that this has led to the facilitation of administrative processes and the speeding up of the interaction between users and authorities.

The system complies with Directive 2010/65/EU of the European Parliament and of the Council of 20 October 2010 on reporting formalities for ships arriving in and/or departing from ports of the Member States, and the Ordinance on the provision of river information services on the inland waterways of the Republic of Bulgaria.

2. Functioning of and **Integrated Information System (IIS)** for resources and information management in BPICo – SAP ERP 6.0. The system aims to improve the management and control of resources and optimization of the processes of maintenance and operation of the port infrastructure, ensuring sustainability and



improvement of the administrative capacity, improving the effectiveness of management when planning and implementing investment projects, as well as accelerating the process of implementation of projects under OPTTI 2014-2020. The system is in operation since January 2017.

3. Good administrative practice is **the certification of port operators according to the requirements of the ISO 9001: 2008** quality management standard. It is determined as a minimum requirement for the Bulgarian river ports in Ordinance No 9 of 17 October 2013 on requirements for operational suitability of ports and specialized port facilities. The certificate gives assurance to the customers and contractors of port operators that they are reliable business partners. It is a prerequisite for improving the good image and attracting customers. Given the market nature of port services and the promotion of competition, it can be concluded that the certification and maintenance of the validity of such a certificate can only have a positive impact on the business of the river ports.
4. Another good practice that can be applied in Bulgaria is the self-agency, as it is done in Austria and Germany. For this purpose, in the BulRIS system there should be present enough information to assist captains of vessels in the procedures of filling documents, then the vessel is self-agented because national legislation allows this.

The above examples only identify good practices in Bulgarian river ports, and can be applied not only in port operations, but are also subject to the principle of good management.