



CENTER FOR
THE STUDY OF
DEMOCRACY

Dirty Streams

Organised Crime, Corruption and Control over
Municipal Waste Services

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Municipal Waste Services**

Waste-management crime is becoming one of the most lucrative and least-sanctioned segments of organised crime, with severe consequences for the environment, public health and municipal budgets. This report traces the main forms of waste crime across the entire waste-management chain in Bulgaria—from collection and transport to treatment, landfilling and cross-border trafficking—through an analysis of the legal framework, enforcement practice and selected case studies. Particular attention is paid to Sofia, one of the most affected cities.

The authors acknowledge the expert support of Emil Georgiev, Director of the Directorate “Planning and Management of Waste Activities” at Sofia Municipality, and Dr Pavlin Kodzhahristov, Deputy Director of the Sofia Inspectorate at Sofia Municipality. The authors also thank Veneta Kovacheva, CSD intern and a student at The Hague University, for her assistance in implementing the study.

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This overview report has been prepared with the financial support of the Sofia Municipality. The authors bear full responsibility for the content of the document and under no circumstances can it be assumed that this document reflects the official position of the Sofia Municipality.



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Cover photo: Pixabay

ISBN: 978-954-477-552-0

Sofia: Center for the Study of Democracy, 2026.

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SUMMARY

Waste-management offenses represent one of the most rapidly expanding and lucrative sectors of organized crime within the European Union (EU). Generating an estimated €9.5 billion annually, this illicit industry currently ranks as the third most profitable criminal activity, surpassed only by narcotics trafficking and VAT fraud. Data suggest that **between 15% and 30% of all EU waste shipments are illicit**—a trend driven by a heightened demand for low-cost disposal alternatives in response to increasingly stringent regulatory frameworks. Criminal syndicates exploit the disparity between high legal processing costs and insufficient oversight, offering expedited, clandestine solutions for landfilling, incineration, and transboundary waste transport.

In Bulgaria, these practices are rooted in the 1996–1997 economic crisis, which precipitated the collapse of municipal waste collection infrastructures and facilitated rapid privatization. This transitional period allowed non-state actors—including smuggling networks and influential economic elites—to secure control over urban sanitation services through newly incorporated entities. The resulting **oligopolistic market structure** precludes external competition, ensures inflated profit margins, and fosters entrenched linkages between private operators and local political administrations. Consequently, the sector is characterized by systemic corruption and clientelism, and efforts to dismantle these dependencies often trigger operational disruptions or sanitation crises.

The European Union’s legal architecture regarding environmental governance is undergoing a period of dynamic evolution. The Waste Framework Directive (WFD) codified foundational principles, including the “polluter pays” doctrine, the waste hierarchy, and extended producer responsibility (EPR). Successive legislative amendments have since instituted more rigorous recycling benchmarks and mandated the segregated collection of specific waste streams, notably bio-waste and textiles.

A transformative shift is marked by the adoption of Directive (EU) 2024/1203 on the protection of the environment through criminal law. This instrument substantially broadens the spectrum of criminalized conducts, stipulating custodial sentences of up to ten years for aggravated offenses and imposing substantial financial penalties on legal entities, with fines reaching a minimum of €40 million or 5% of global annual turnover. Furthermore, the directive extends the criminal justice scope to include **new environmental offenses**—such as illicit water abstraction, violations of chemical regulations, substandard ship recycling, and the commercialization of products linked to deforestation. Beyond punitive measures, it enhances the procedural standing of civil society organizations and mandates more robust national strategies, specialized training, and inter-institutional coordination.

The Bulgarian legislative framework for waste management is primarily anchored in the Waste Management Act and specific provisions of the Penal Code, which criminalize the illicit management of hazardous and non-hazardous waste, as well as unauthorized transboundary shipments. Despite the existence of relatively stringent statutory sanctions, criminal prosecution is seldom realized in practice. Instead, the majority of infractions are adjudicated through administrative channels; however, the resulting fines often fail to offset the substantial economic gains derived from non-compliance.

The sporadic nature of institutional oversight, coupled with a lack of effective convictions, fundamentally negates the law's deterrent function and incentivizes recidivism. This enforcement gap is further exacerbated by **institutional capacity deficits** within the National Police, the Regional Inspectorates of Environment and Water, and municipal administrations, whose **efforts remain largely uncoordinated**.

The most prevalent manifestations of waste-related crime in Bulgaria include unauthorized disposal, subterranean burial, illicit incineration, and transboundary trafficking, often facilitated by the unregulated practices of ostensibly legitimate operators. **Unauthorized dumping is endemic**; the peripheries of major urban centres and rural areas are frequently marred by dozens, and in some cases hundreds, of illegal landfills. A salient example is the “Gorublyane” case in Sofia, where an organised criminal enterprise coordinated the disposal of vast quantities of soil and construction debris on private agricultural land. This operation generated an estimated monthly revenue of 500,000 BGN (approximately €250,000) through a sophisticated scheme involving legitimate transport firms, fraudulent contractual agreements with landowners, and the systematic evasion of oversight by truck drivers through early-warning regarding pending inspections.

Furthermore, **transboundary trafficking** remains a persistent challenge, characterized by the importation of waste—predominantly from Italy—under the guise of industrial feedstock or Refuse Derived Fuel (RDF). These shipments often arrive at facilities lacking the requisite processing infrastructure. Consequently, these materials are frequently stockpiled at thermal power plants or industrial sites suspected of engaging in unauthorized thermal recovery. These schemes typically utilize intermediary “shell” companies with minimal staff, employing repetitive resale cycles and fraudulent documentation to obscure the waste's origin and destination.

Within the legal sector, abuses frequently involve “**pseudo-recycling**,” incomplete recovery processes, and the circumvention of Extended Producer Responsibility (EPR) schemes through the **manipulation of reporting data**. These practices are often underpinned by documentary and financial fraud, including the deliberate misclassification of hazardous waste, falsified laboratory analyses, fictitious invoicing, and money laundering. Such activities are compounded by systemic corruption and political interference, ranging from influence peddling and electoral clientelism to the intimidation of municipal officials, inspectors, and whistle-blowers.

The ramifications of these illicit activities are profound:

- **Ecological and Public Health Impacts:** Sustained contamination of air, soil, and hydraulic systems, the emission of hazardous toxins, and long-term degradation of local ecosystems.
- **Economic Disruption:** Significant fiscal burdens associated with environmental remediation, loss of tax revenue, the distortion of market competition and stimulation of the informal economy.
- **Societal Consequences:** The erosion of public trust in state institutions, the normalization of extra-legal behaviour, and the fundamental undermining of the transition toward a circular economy.

The report demonstrates that waste-related offenses constitute a **structural phenomenon** sustained by a convergence of economic incentives, regulatory loopholes, insufficient oversight, and entrenched corrupt practices. Establishing an effective counter-strategy necessitates a multi-dimensional approach: legislative reform, the timely transposition of European directives, the reinforcement of criminal law mechanisms, and the implementation of turnover-linked financial penalties. Furthermore, structural improvement requires enhanced inter-institutional coordination, the deployment of systematic electronic tracking systems for waste flows, and the integration of civic oversight into monitoring and reporting frameworks.

The findings highlight three critical pillars where immediate intervention is required:

1. Reform of the Criminal Justice Framework

A priority is the urgent transposition of Directive (EU) 2024/1203 into the national legal system, necessitating amendments to the Penal Code. This reform should focus on the explicit criminalization of unauthorised waste disposal—including construction and demolition debris—and the introduction of stringent liability frameworks. Crucially, this must encompass both direct perpetrators and executive management figures. To ensure a genuine deterrent effect, sanctions should be calibrated against the annual turnover of the involved legal entities, thereby neutralizing the economic profitability of environmental non-compliance.

2. Institutional Capacity and Inter-agency Synergy

Addressing institutional fragmentation is paramount. The establishment of a Joint Inter-agency Task Force for Environmental Crime—comprising the Ministry of Interior, the Prosecutor's Office, the Customs Agency, the National Revenue Agency, and regional environmental inspectorates—would facilitate a unified enforcement response. This administrative strengthening should be augmented by technological integration, including the utilisation of geospatial intelligence (satellite monitoring), unmanned aerial vehicles (drones), and video surveillance to proactively identify illicit disposal sites and track suspicious logistical patterns.

3. Civic Oversight and Transparency Mechanisms

To mitigate the impact of corruption and institutional inertia, the state must institutionalize robust mechanisms for public participation. This includes the development of secure, anonymous reporting platforms for whistle-blowers and the creation of a publicly accessible, real-time statistical database for environmental offenses. These measures are key to overcoming corruption pressure and mobilizing citizens as a corrective to institutional inaction.

INTRODUCTION

Waste crime is one of the fastest growing forms of organised crime in the European Union, with a global dimension. Illegal waste trafficking remains a high-profit and low-risk area for organised crime. In most EU countries, **illegal waste disposal ranks first among environmental crimes**. Organised crime's revenue from illegal waste in the EU is **comparable to that from human trafficking** and amounts to €9.5 billion per year. According to the latest estimates of the amount of proceeds from criminal activities in the EU, waste crime is the third most profitable illegal activity after drug trafficking and VAT fraud.¹

The business model of this high-profit and low-risk crime in Europe is largely driven by the demand for cheap management, processing and disposal services by waste generators. The rigorous environmental standards mandated by the European Union's legislative framework necessitate substantial compliance-related expenditures for economic operators. Criminal networks are taking advantage of these stricter regulations by offering **cheaper, illegal alternatives**. This creates a market for cheap and illegal disposal, leading to illegal dumping in unregulated landfills and waste trafficking to countries with weaker controls and enforcement.²

According to Europol, waste-related crime in Europe, in particular illegal dumping and trafficking, is increasing in scale and complexity, fuelled by the huge volumes of waste generated globally. In addition, criminal networks are targeting the trafficking of recyclable materials such as plastics, e-waste and end-of-life electric vehicle batteries in order to extract valuable elements through illegal methods.³ According to various estimates, between 15% and 30% of all waste shipments within and outside the EU are illegal.⁴ Waste trafficking networks are also highly adaptable. For example, after the introduction of a ban on the import of solid waste into China in 2021, they effectively redirected their routes to other countries with weaker law enforcement. The difference in tariffs imposed by various countries encourage cross-border trafficking of waste within and outside the EU. **Among the leading countries with illegal landfills in Europe are Romania with over 15,000 sites by 2024, followed by Slovakia (11,797) and Albania (9,046).**⁵

¹ European Commission, Directorate-General for Migration and Home Affairs, Center for the Study of Democracy (CSD), EY, Government Transparency Institute (GTI), Optimity Advisors & RAND Europe, *Mapping the risk of serious and organised crime infiltrating legitimate businesses : final report*, Luxembourg: Publications Office of the European Union, 2021.

² Ibid.

³ Europol, *European Union Serious and Organised Crime Threat Assessment - The changing DNA of serious and organised crime*, Luxembourg: Publications Office of the European Union, 2025.

⁴ Garuto, L., and Grassin, S., *Fighting Waste Trafficking in the EU: A Stronger Role for the European Anti-Fraud Office*, EUCRIM, (2:143-145), 2024.

⁵ So, W., *Estimated number of illegal dumps in Europe 2024, by country*, Statista, Energy & Environment, 20 January 2026.

There are different definitions of waste crime, and there is currently no universally accepted one. The United Nations Office on Drugs and Crime proposes the following:

“... the trade, treatment or disposal of waste in ways that breach international or domestic environmental legislation and cause harm or risk to the environment and [or] human health and related conduct, such as fraudulent acts and omissions.”⁶

This definition covers a wide range of activities – from illegal collection, transportation and treatment to unregulated dumping and complex cross-border trafficking schemes. The economic entities whose activities generate waste, as well as their owners, are obliged by law to treat it themselves or to provide it to licensed companies. Violation of this requirement is the main starting point for illegal practices.

For Bulgaria, organised crime related to waste represents a huge and **growing risk**, the roots of which can be found in the years immediately following the financial and economic crisis of 1996–1997. The crisis gave the then-political class grounds to privatize municipal and state-owned companies for cleaning in large cities. The reasoning was that the lack of funds leads to the collapse of the systems for sanitation in Bulgarian cities. Employees in municipal companies do not receive their salaries regularly and leave *en masse*, and the consequence is that large parts of the cities are left with waste that has not been collected for months. The decision to find private investment through privatization or concession of this public service opened the opportunity for Bulgarian organised crime to take advantage and legalize their criminal capital accumulated at the beginning of the transition.

Newly registered private companies of the power groups, smugglers, oligarchs and shady businessmen quickly won the concessions for waste collection and disposal in the cities. As a result, **the business of collecting and disposing of household waste in Bulgaria permanently became a safe haven for criminal entrepreneurs by the end of the 1990s**, when they were already squeezed out of other sectors by the political and economic stabilization of the country and the first efforts to establish law and order in connection with accession to the European Union. In practice, **criminal entrepreneurs and the capital associated with them managed to put the waste collection business in the largest cities under almost complete control and to close the market to both Bulgarian and international companies**. This monopoly provided them, and continued to provide them, with significantly higher profit margins.

An additional, extremely negative consequence of the control over the collection of household waste is that the owners of large concessionaire companies manage to build **strong influence in political parties and develop clientelistic relations**, thus gaining opportunities to influence local and parliamentary

⁶ UNODC, *Combating waste trafficking: A guide to good legislative practices*, Vienna: United Nations Office on Drugs and Crime, 2022.

elections. Thus, the sector of collection and transportation of household waste has become **a major source of endemic corruption amongst employees in the control bodies of municipal and state administration at the local level**, and a source of corrupt income for local party clients. Using corrupt payments, these companies successfully circumvent the requirements of the legislation, as well as measures for control over the collection, transportation, processing and disposal of waste.

The experience in Sofia and several of the country's major cities shows that over the years, every attempt to destroy the oligopolistic control of former entrepreneurs by organised crime leads to crises in the collection of household waste. **The waste management crises in Sofia are a particularly vivid example of this, as they have marked the mandates of each of the city's mayors over the past twenty years.**⁷ Therefore, a number of mayors and local government representatives in the country prefer to reach agreements, continuing to guarantee the profits of these companies.

In this context, the main objective of this study is to identify and analyse the most typical crimes accompanying the entire waste management process in Bulgaria. A special focus of the report is Sofia, as the largest city generating the most waste and, accordingly, most often facing problems related to unregulated collection, transportation, treatment and disposal. In addition, the analysis will assess the size and scale of illegal practices and the revenues generated.

⁷ Svobodnaevropa.bg, „Софиянски, Борисов и все така Вълка. Какво стана при предишните кризи с боклука в София“ [Sofiyanski, Borisov and still the Wolf. What happened during previous waste crisis in Sofia], 10 November 2025.

LEGAL AND REGULATORY FRAMEWORK

Modern European and Bulgarian waste legislation is based on the EU Waste Framework Directive (WFD),⁸ adopted in 2008. The most significant contribution of the Framework Directive is the establishment of a **legally binding hierarchy in waste management**, forcing Member States to prioritize prevention and reuse over recycling and disposal. It also introduces the ‘polluter pays’ principle and the concept of **extended producer responsibility**. The Directive also sets an initial target of 50% recycling of municipal waste by 2020, which triggered the mass introduction of separate collection containers across Europe. The first significant amendment to the Framework Directive took place in 2018, when the EU acknowledged that voluntary measures were insufficient. Directive (EU) 2018/851⁹ introduced a number of measures to move towards a circular economy:

- **Mandatory recycling targets for municipal waste:** 55% by 2025, 60% by 2030 and 65% by 2035;
- **Extended scope of mandatory separate collection:** legal requirement for separate collection of bio-waste (by 2023), textiles (by 2025) and hazardous municipal waste (by 2025);
- **Minimum requirements for extended producer responsibility:** guarantees that producers will pay the full net costs of waste management.

The second significant amendment to the Framework Directive took place in 2025, focusing on the most significant waste streams: **textiles and food**. Directive (EU) 2025/1892¹⁰ makes the extended responsibility of textile producers mandatory, obliging them to financially cover the collection, sorting and recycling of used textiles. “Eco-modulated” fees are also introduced, meaning that “fast fashion” producers (low durability, difficult to recycle) pay higher fees than those producing durable and sustainable clothing. The 2025 Directive also sets **binding targets for reducing food waste by 2030**: a 10% reduction in processing and production and a 30% reduction (per capita) in retail and consumption (households and restaurants).

At the heart of European waste policy is the transition from aspirational, voluntary measures to effectively forcing businesses to design their production in such a way that waste is gradually eliminated from the system. Enforcement measures include strict extended producer responsibility fees, landfill bans and various punitive measures for criminal offenders.

⁸ Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (Text with EEA relevance).

⁹ Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste (Text with EEA relevance).

¹⁰ Directive (EU) 2025/1892 of the European Parliament and of the Council of 10 September 2025 amending Directive 2008/98/EC on waste (text with EEA relevance).

European framework against environmental crime: A paradigm shift

The European Union took decisive steps to tackle environmental crime with the new Directive (EU) 2024/1203,¹¹ which introduced the most significant reform of EU environmental criminal law since 2008. The revision is driven by several critical factors:

- **Growth of environmental crime:** The alarming increase in environmental crime and its consequences also calls for more effective countermeasures through criminal law.
- **Ineffectiveness of the existing legal framework:** The existing administrative and criminal sanctions (based on Directive 2008/99/EC) do not have a sufficiently deterrent effect and do not ensure compliance with EU environmental law. The new directive aims to strengthen deterrence through criminal law, which is considered a more effective means than administrative sanctions.
- **Cross-border nature:** Environmental crimes increasingly go beyond the borders of the Member States in which they are committed, which requires a more coordinated and unified cross-border response.
- **Alignment with EU objectives:** The changes are in line with the European Green Deal and the EU Biodiversity Strategy for 2030, reinforcing the Union's commitment to a high level of environmental protection.

The 2024 directive introduced the following significant changes to the criminal law framework: 1) it broadened the scope of environmental crimes; 2) it introduced stricter and harmonised sanctions; 3) it strengthened the liability of natural and legal persons; 4) it strengthened the role of civil society in criminal proceedings.

Broadening the Scope of Environmental Crimes

The directive significantly expands the list of acts that are classified as criminal offences. It replaces the previous list from Directive 2008/99/EC with a more comprehensive one that reflects the new realities of environmental protection.

- **New categories:** The definition of offences now covers a wider range of activities, including illegal ship recycling, illegal water abstraction, serious infringements of EU chemicals legislation and the placing on the market of goods linked to deforestation.
- **Qualified offences (comparable to 'ecocide'):** An important innovation is the introduction of so-called 'qualified offences'. These are offences that cause destruction or widespread and significant damage that is irreversible or long-lasting to an ecosystem of significant size or ecological value. This provision is designed to cover behaviour comparable to "ecocide".

¹¹ Directive (EU) 2024/1203 of the European Parliament and of the Council of 11 April 2024 on the protection of the environment through criminal law and replacing Directives 2008/99/EC and 2009/123/EC.

- **Failure to act, fraud, corruption:** An important change is that the offences now cover both acts and omissions, and the “illegality” of the perpetrators’ actions is also present when permits are obtained through fraud or corruption.

Stricter and Harmonised Sanctions

The directive obliges Member States to introduce effective, proportionate and dissuasive criminal sanctions.

- **Imprisonment:** Higher maximum terms of imprisonment (up to 10 years) are set for natural persons who commit environmental offences, in particular for those causing death or serious bodily harm (Article 3(2)).
- **Fines for legal persons:** Specific standards for fining companies are introduced. Fines should be effective and based on a percentage of the legal person’s total worldwide turnover (with a maximum of no less than 5%) or fixed maximum amounts (with a maximum of no less than €40 million).
- **More severe penalties for serious offences:** for offences resulting in the destruction or widespread and significant damage, which is irreversible or long-term, of an ecosystem or a habitat within a protected area, or widespread and significant damage, which is irreversible or long-term, to the quality of air, soil or water, the penalties should be more severe than those provided for non-serious offences.

Liability of Natural and Legal Persons

The most significant change in this directive is the shift of liability from corporate to personal. The text clarifies and strengthens the liability of legal persons. Although it excludes state and public bodies exercising state authority, the directive ensures that **companies can be held criminally liable for crimes committed for their benefit by persons in managerial positions**. The penalties targeted at CEOs and board members are intended to increase personal risk, thereby making complicity in such schemes significantly less attractive. It provides for significantly harsher penalties, including imprisonment of up to eight years for natural persons who commit environmental crimes. If the crime causes death, the sentence increases to 10 years. Fines of up to €40 million or 5% of annual turnover, depending on the crime, are foreseen for companies.

Procedural Rights and Public Participation

The directive also strengthens the role of civil society. It requires that representatives of the “concerned public” (such as non-governmental organisations) who have procedural rights in other contexts be allowed to participate in proceedings relating to environmental crimes, as civil claimants for example. In addition, the 2024 Directive imposes new management and enforcement measures, including **national strategies to combat environmental**

Bulgarian Waste Management Legislation

crime, improved training of law enforcement authorities, coordination mechanisms and systematic collection of statistical data in a harmonised format. Member States have two years to transpose this revised Directive into their national legislation.

The Bulgarian legal framework in the field of waste management is based primarily on the Waste Management Act (WMA)¹² and the provisions of the Criminal Code (CC)¹³ governing environmental crimes, in particular Articles 353b-353d, which criminalise the illegal management of (hazardous) waste and illegal transboundary shipments of waste. The relevant sections of the Criminal Code **relating to waste crimes retain their main parameters as amended in the State Gazette, issue 33 of 2011.**

The 2024 Directive requires Member States to bring their legislation into line with the new minimum standards for the criminalisation of serious environmental offences by 21 May 2026.¹⁴ At the end of 2025, the Ministry of Justice officially announced¹⁵ that the preparation of legislative amendments to transpose Directive (EU) 2024/1203 and to strengthen criminal law protection against environmental crimes, including waste crimes, is among the priorities of the government, and at the time of writing this report, **no specific transposition law has yet been promulgated.**

The Waste Management Act provides for a **wide range of coercive administrative measures and administrative penalties**, including fines for individuals, officials, sole traders and legal entities. Fines for individuals generally range from 300 to 1,000 BGN, and for „clearly minor cases“ (for example, dumping waste in unregulated places or in containers designated for separate collection of waste for mixed household waste), fines with a ticket of 10 to 50 BGN may be imposed on the spot, and property sanctions for sole traders and legal entities for illegal dumping or unregulated treatment of waste vary from 1,400 to 4,000 BGN for non-hazardous waste and from 10,000 to 50,000 BGN for hazardous waste, and in the event of a repeated violation they can reach up to 100,000 BGN. Unlike crimes under the Criminal Code, where the focus is on acts that have created a danger to the life and health of people or caused significant damage to the environment, the Waste Management Act also sanctions „minor“ violations in everyday behaviour - unregulated dumping waste, mixing recyclable waste with household waste, etc. In practice, however, **such violations are rarely prosecuted and punished systematically**, as evidenced by the numerous unregulated landfills in the country and the mass dumping of recyclable waste in mixed household waste containers in cities.

¹² Bulgaria, [Закон за управление на отпадъците](#) [Waste Management Act], prom. SG, No. 53 of 13 July 2012, effective as of 13 July 2012; amended, No. 106 of 22 December 2023, effective as of 1 January 2024; suppl., No. 108 of 30 December 2023, effective as of 1 January 2024.

¹³ Bulgaria, [Наказателен кодекс](#) [Criminal Code of the Republic of Bulgaria], last suppl., SG No. 87 of 17 Oct. 2025.

¹⁴ [Directive \(EU\) 2024/1203](#), Article 28.

¹⁵ Bulgaria, Ministry of Justice, [„МП предлага: Изхвърлянето на големи количества отпадъци на неразрешени места става престъпление“](#) [MP suggests: Dumping of large quantities of waste on unauthorised sites to be criminalised], 2025.

The Criminal Code provides for crimes related to improper waste management, both „imprisonment“ and fines, with the type and amount of the sanctions depending on the consequences that occurred - creating a danger to the health and life of people, causing death or serious injuries, as well as causing significant damage to the environment. A number of sections also provide **for qualified cases with more severe penalties in case of particularly serious consequences, recidivism or participation in an organised criminal group** (see Table 1).

Despite the formally high sanction thresholds, review of case law shows that there are practically **no effective prison sentences** under these provisions, with cases usually ending with administrative sanctions, suspended sentences or agreements. Law enforcement experts note that **crimes related to waste management are often committed in conjunction with other criminal activities, such as money laundering, document and tax fraud, as well as corruption** crimes of officials, which further complicates their investigation and proof.

Table 1. Crimes Related to Waste Management and Corresponding Penalties

Criminal sections under the Criminal Code	Penalties
Article 353b	
Illegal management that created a danger to life or health or significant damage to the environment	Imprisonment from 1 to 5 years and a fine of 5,000 to 30,000 BGN
in case of death or serious bodily injury to one or more persons	Imprisonment from 5 to 20 years and a fine of 10,000 to 50,000 BGN
in case of causing significant damage to the environment	Imprisonment from 2 to 8 years and a fine of 10,000 to 50,000 BGN
Article 353c	
Illegal management of hazardous waste	Imprisonment for up to 5 years and a fine of 2,000 to 20,000 BGN
if it creates a danger to the life or health of another person or causes significant damage to the environment	Imprisonment for 1 to 6 years and a fine of 10,000 to 30,000 BGN
if it causes death or serious bodily injury to one or more persons	Imprisonment for 3 to 10 years and a fine of 20,000 to 50,000 BGN
Article 353d	
Illegal transportation of waste across borders	Imprisonment for up to 4 years and a fine of 2,000 to 5,000 BGN

Source: Center for the Study of Democracy.

The Ministry of Justice has prepared amendments to the Criminal Code that will make the dumping of household, industrial or construction waste in large quantities in unauthorized places a crime punishable by imprisonment and a fine.¹⁶ However, this change has not yet entered into force. According to information on the website of the Ministry of Justice, the fines are not intended to be tied to the turnover of the offending companies, but to be fixed amounts (**in violation of the norms of the European Directive of 2024**).¹⁷

Institutional Control

The Waste Management Act clearly divides control powers between the local, regional and national levels.

At the local level, the mayor of the municipality or an official authorized by him exercises control over the activities of the generation, collection (including separate collection), storage, transportation and treatment of household and construction waste, over the disposal of industrial and hazardous waste at municipal and regional landfills, as well as over the abandonment and unregulated disposal of household waste and the closure, reclamation and subsequent monitoring of landfills on the territory of the municipality.

At the regional level, the director of the relevant regional inspectorate for environment and water (RIEW) or an official authorized by him controls compliance with the requirements for waste treatment and the conditions of the issued permits and registration documents, including the operation of installations and facilities for waste storage and treatment, the fulfilment of the obligations of persons under the law and accountability in the waste-management system.

At the national level, the Minister of Environment and Water exercises control over recovery organisations and persons individually fulfilling the obligations for the management of mass-produced waste, as well as over waste-management activities and the implementation of the relevant EU regulations, including in the part on cross-border shipments.

Municipal councils are not control bodies under the law, but adopt regulations on the terms and conditions for the disposal, collection (including separate collection), transportation, recovery and disposal of municipal and construction waste on the territory of the municipality. These regulations, adopted on the basis of Art. 22 of the Waste Management Act, determine the local regulatory framework within which the mayor and operators are obliged to organise and implement waste management.

The prosecution of violations and crimes related to waste is carried out not only by the prosecutor's office and regional environmental inspectorates, but also by the Customs Agency, the National Revenue Agency and the General Directorate of the National Police (DGNP). Since February 2023, a specialized unit for combating crimes against the environment and wildlife has been operating within the structure of the General Directorate of the Environment

¹⁶ Ibid.

¹⁷ [Directive \(EU\) 2024/1203](#), Article 7(3).

and Wildlife, whose powers also cover the investigation of crimes related to waste management. According to the prioritisation of the professional leadership of the General Directorate of the Environment and Wildlife, the **unit's focus is mainly on crimes related to general waste (Art. 353b) and hazardous waste (Art. 353c)**, and within the framework of operational-investigative activities, it often works in coordination with customs and tax authorities in cases of cross-border trafficking, tax and excise fraud.

Main Gaps and Challenges

Analysis of the existing administrative and law enforcement practice, interviews with experts in the field of waste management and the international roundtable on “Urban Waste Wars: Fighting Crime, Corruption and Pollution”¹⁸ held on October 8, 2025 all outline **a number of structural gaps**, both in the legal framework and in its implementation. The most important of them are the following:

- **Incomplete implementation of criminal law provisions.** The Criminal Code provides for relatively high sanctions for crimes related to waste management, but in practice they are rarely used. Acts that, by their characteristics and consequences, fall within the scope of Art. 353b–353d of the Criminal Code, are often treated solely as administrative violations under the Waste Management Act and end with an act and a fine from the Regional Inspectorate for Environmental Protection or the municipality, without leading to pre-trial proceedings and indictment. The amendments discussed by the Ministry of Justice to strengthen criminal protection in the field of waste are in practice **an admission that the existing sanctioning framework and its implementation do not provide a sufficient deterrent effect.**
- **Limited focus on the roles of the perpetrators.** Formally, the sections of the Criminal Code allow for the prosecution of any person who carries out or organizes illegal waste activities, but in practice, criminal prosecution focuses on the “obvious” subjects – operators with a permit, persons under Art. 35 of the Waste Management Act and individuals whose activities generate waste. This creates **a gap in relation to intermediaries, consultants, actual owners and persons who derive economic benefit** without formally having obligations in waste management, and who are less often involved as co-perpetrators or instigators under the general sections (organised crime group, document fraud, money laundering, corruption).
- **Ineffectiveness of the applied sanctions.** Although the Waste Management Act provides for substantial fines for legal entities – for example, from BGN 10,000 to BGN 50,000 for illegal dumping or unregulated treatment of hazardous waste and up to BGN 100,000 for repeat offences – in practice, lower sanctions are often imposed, usually for individual violations, without resorting to additional measures (such as withdrawal of permits, temporary suspension of activities, confiscation of benefits). Combined with the high profits from illegal treatment and disposal of waste, this **renders the deterrent function of sanctions meaningless, especially**

¹⁸ Center for the Study of Democracy, *Urban Waste Wars*, Roundtable, Sofia, 8 October 2025.

against organised networks and large operators. Additionally, national law still lacks turnover-related sanctions for legal entities, as required by Directive (EU) 2024/1203, where maximum fines are tied to percentages of annual turnover or very high absolute thresholds.

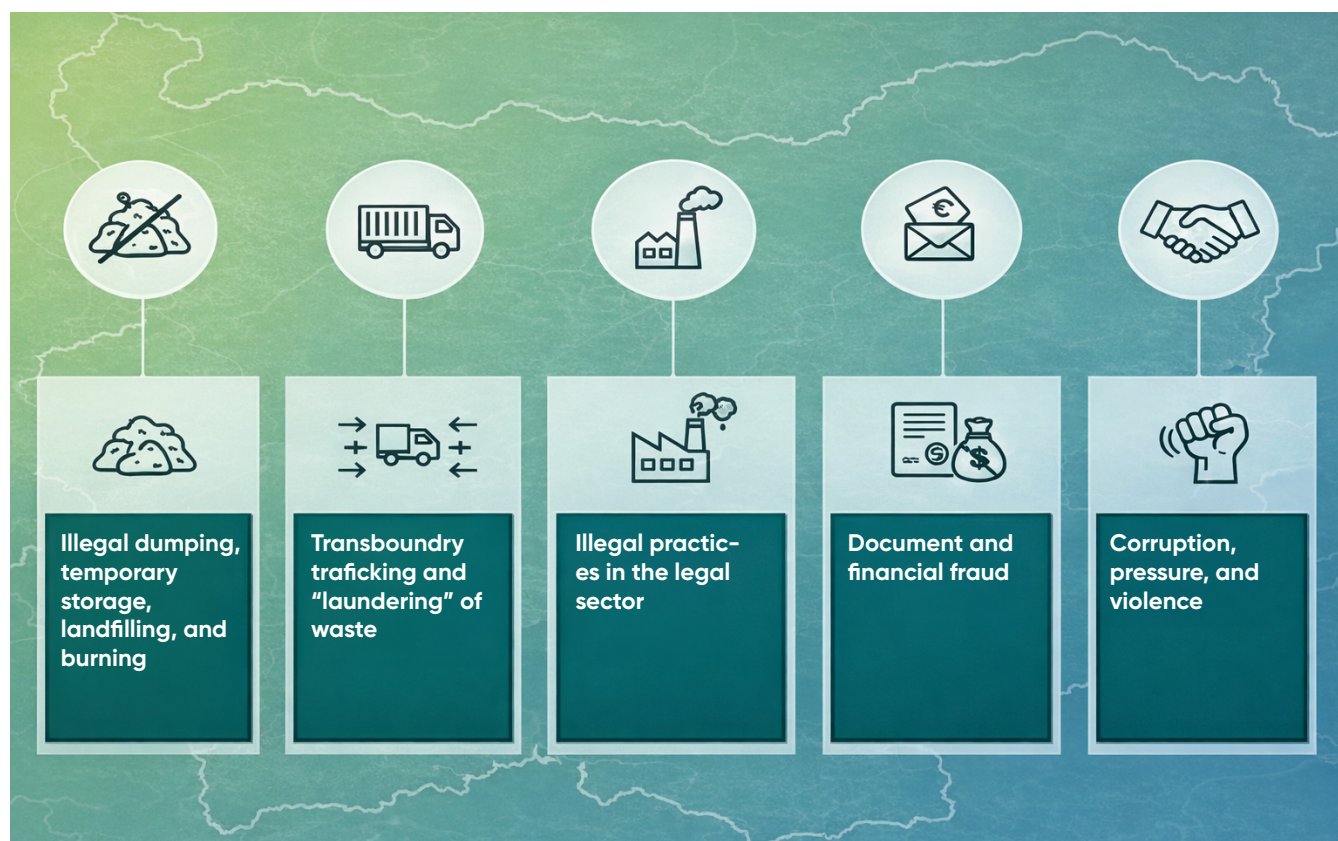
- **Illegal landfills and minor violations.** The Waste Management Act and municipal regulations formally prohibit the dumping of waste in unauthorized places and provide for fines for both individuals and legal entities, as well as obligations of the mayor to prevent the creation of illegal landfills and organise their cleaning. In practice, however, sanctions against individual violators are rarely imposed, control is episodic, and the costs of cleaning are usually borne by the municipality. This leads to a **chronic accumulation of unregulated landfills and the normalization of “minor” violations as behaviour without real risk.**
- **Limited pursuit of responsibility for inaction of control bodies.** The law contains provisions on administrative-criminal liability of mayors and officials for failure to fulfil obligations to control and prevent illegal landfills, but expert assessments show that in practice these texts are almost never applied. This creates a **feeling of impunity for systematic failure or formal performance of control functions**, including in cases where inaction is a prerequisite for severe environmental damage.
- **Insufficient investigative capacity.** The specialized unit for environmental and wildlife crimes at the General Directorate of Environmental Crimes is an important step forward, but its resources are limited compared to the scope of the problem. A significant aspect of the most serious violations is that they are committed in remote and sparsely populated areas, where there are no permanent investigative teams with the necessary expertise. **There is a lack of sufficient technical capabilities to trace waste streams and to quickly identify and prove real environmental damage** (for example, through systematic laboratory tests, satellite monitoring, integrated information systems).
- **Underused potential of citizen signals.** The law allows for the submission of signals and complaints, and municipalities and non-governmental organisations are increasingly documenting unregulated waste dumping and incineration. However, there is **no unified, easily accessible and well-communicated system for submitting and tracking of signals**, nor clear guarantees that each signal is verified and leads to a visible result. This discourages citizens and local communities from actively participating in monitoring of problematic sites and locations.¹⁹
- **Lack of a reliable statistical base.** The official statistics of the Ministry of Interior and the National Institute of Statistics do not allow a clear distinction between crimes related to illegal waste management and other crimes against the environment. The annual and monthly reports lack a separate category for such acts, and publicly available data usually indicate a minimal number of detected crimes in this group. **This makes it difficult to assess the real scale of the problem, plan resources for counteraction, and monitor the effect of the policies undertaken.**

¹⁹ Sabev, M., Bezlov, T., and Georgiev, G., *Registration of Crime in Bulgaria: Normative and Institutional Aspects*, Sofia: Center for the Study of Democracy, 2021.

TYPES OF WASTE CRIMES

Crimes related to waste management do not represent a single type of act, but rather a group of sustainable illegal practices that combine environmental violations, economic fraud and often corruption. International assessments paint a similar picture.^{20,21,22,23,24} Several patterns are repeated throughout the chain: illegal dumping, temporary storage, burial and incineration; cross-border trafficking and waste “laundering”; abuse of formally legal operators and extended liability schemes; documentary and financial fraud; corruption, pressure and intimidation. The common denominator between these practices is their economic driver. For a large part of waste, especially hazardous flows, mixed, construction, low-quality plastics, the value is negative - **legal**

Figure 1. Types of Waste Crimes in Bulgaria



Source: Center for the Study of Democracy.

²⁰ Isarin, N., Baez Camargo, C., and Cabrejo le Roux, A., *Dirty deals – Case studies on corruption in waste management and trade*, Basel Institute on Governance, 2023.

²¹ Favarin S., Screen P., and Axinte L. A., *Waste crime investigation phases and the role of emerging technologies*, Milan: Università Cattolica del Sacro Cuore, 2025.

²² Dutch National Police, *Environmental Crime Threat Assessment 2024*, The Hague: Strategic Environmental Chamber, 2024.

²³ Europol, *European Union Serious and Organised Crime Threat Assessment*, Publications Office of the European Union, 2025.

²⁴ Parr, N., and Hess, M., *National waste crime survey 2025: results and findings*, London: UK Environment Agency, 2025.

collection, transportation and treatment generate high costs without the possibility of them being even partially compensated by subsequent use or sale of recycled materials.^{25,26} The difference between the value of these costs and the “cheap solutions” becomes profit for criminal networks. Where control is weak and sanctions are low, the rational choice for some participants in the sector is for waste to “disappear” from the system – to be deposited irregularly, buried, burned under inappropriate conditions or exported to jurisdictions with weaker standards.

The Bulgarian context is not significantly different. In recent years, the country has established itself both as a territory with widespread unregulated landfills and illegal incineration, and as a destination or transit point for waste from other Member States, especially Italy.^{27,28} **Bulgarian investigations and court cases reveal the same set of practices described in international reports:** from dumping and burying waste near settlements, through “paper recycling” without real treatment, to cross-border schemes involving intermediaries, shell companies and political patrons. The main manifestations of waste-related crime in the Bulgarian context are related to three key categories of crimes and offences – **illegal dumping and incineration, cross-border trafficking and unregulated practices of legal operators**, which are usually accompanied by a number of additional crimes (Table 2).

Table 2. Main Categories of Waste Management Crimes Worldwide and in Bulgaria

Crime Category	Common Worldwide Practices	Identified Manifestations in the Bulgarian Context
Illegal dumping, temporary storage, burial and incineration	Unregulated landfills and dumps; abandonment of waste on municipal and private land; burial of construction, industrial and hazardous waste; burning in the open or in inappropriate installations; “disappearance” of waste along the chain between collector and operator.	Massive small-scale illegal dumping around settlements; dozens of unregulated landfills on the outskirts of large cities; cases of burying waste on agricultural properties; storage of large quantities of waste in and around thermal power plants and industrial sites; periodic burning at night and on weekends; persistent emission violations and numerous civil signals of “complex pollution”.
Cross-border trafficking and “laundering” of waste	Illegal shipments between Member States; Export to third countries through incorrect classification (hazardous waste declared as “green” or second-hand goods); Substitution of documents during transport; Multiple reselling through chains of traders and intermediaries; Use of companies without real capacity.	Import of mixed waste (declared as Refuse Derived Fuel - RDF) from Italy and other countries with unclear or illegal purposes; Shipments declared as raw material for production without actual production capacity; Containers discovered and subsequently re-exported at the port of Varna; Involvement of intermediary firms with questionable capacity and links to foreign operators; Bulgaria’s participation in international operations against illegal waste trafficking.

²⁵ Isarin, Baez Camargo, and Cabrejo le Roux, *Dirty deals*, Basel Institute on Governance, 2023.

²⁶ Parr, and Hess, *National waste crime survey 2025: results and findings*, UK Environment Agency, 2025.

²⁷ Levy, A., Tchobanov, A., and Stoyanov, D., *The garbage that is suffocating Bulgaria*, BIRD, 2 January 2021.

²⁸ Bivol.bg, *WasteGate companies investigated for ties with Camorra and Ndrangheta deliver 9000 metric tons of waste to Bulgaria*, 2020.

Illegal practices within the legal sector	“Sham recovery” – declaring recycling or recovery with minimal or no real treatment; Manipulation of sorted stream quality; Returning residues to the market; Abuse of Extended Producer Responsibility (EPR) schemes and recycling certificates; Systematic non-compliance with permit and license conditions.	Risk of simulated recovery and recycling in waste incineration and treatment plants; Concentration of waste collection and treatment contracts in a limited number of operators; Tension around concessions and contracts for waste collection and waste disposal in large municipalities; Limited capacity of municipalities and regional inspectorates to verify the actual implementation of the conditions in permits and contracts.
Documentary and financial fraud	Intentionally misdescribing waste; underestimating hazardous properties; false analyses and certificates; discrepancy between physical cargo and bill of lading; fictitious invoices and turnover; evading fees and taxes by declaring waste as a “product”; money laundering and VAT schemes through chains of shell companies.	In a number of cross-border cases, companies along the supply chain find themselves with minimal staff and real activity, but with large declared turnovers; data on understating the transported quantities in the accompanying documents and on redirecting waste to sites other than those declared; a limited number of cases in which the investigation of the environmental crime and the financial investigation are developed in parallel, but clear indicators of high risk in the sector.
Corruption, pressure, and violence	Buying influence in policy and regulation; favouritism in public procurement; corruption in issuing permits and licenses; selective or “custom” application of control mechanisms; threats and attacks against mayors, inspectors and citizens who report or take action against illegal practices.	Public suspicions of dependence between local political elites and certain operators in the waste sector; political scandals and criminal proceedings related to the import and incineration of waste; cases of physical attacks on local government representatives after attempts to limit illegal dumping; a sense of impunity that undermines trust in institutions and discourages citizen reporting.

Source: Center for the Study of Democracy.

Illegal Dumping, Storage, Burial and Incineration

Illegal dumping and unregulated incineration are the most visible forms of waste crime. The National Waste Crime Survey in England describes them as the illegal dumping or burning of waste outside of authorised facilities, the operation of illegal reception and storage sites and the abandonment of waste on private or public land, including after operators have ceased operations.²⁹ Similar observations are made by the Basel Institute on Governance and the Dutch authorities, who stress that it is precisely the cost savings of proper treatment – in the face of increasing regulatory requirements – that underpin these practices.^{30,31} The consequences of unregulated landfills are severe, including drifting waste, attracting pests such as mice and rats, and releasing toxic gases such as methane and carbon dioxide. The risk of fires during the summer months makes these landfills a potential source of environmental disasters and an immediate threat to the lives and health of those living nearby. An example of such an incident is the fire that broke out in September 2025 at an illegal landfill for construction waste between the Sofia districts of Mladost and Gorublyane.³² In 2025, Plovdiv was also repeatedly affected by fires relat-

²⁹ Parr, and Hess, *National waste crime survey 2025: results and findings*, UK Environment Agency, 2025.

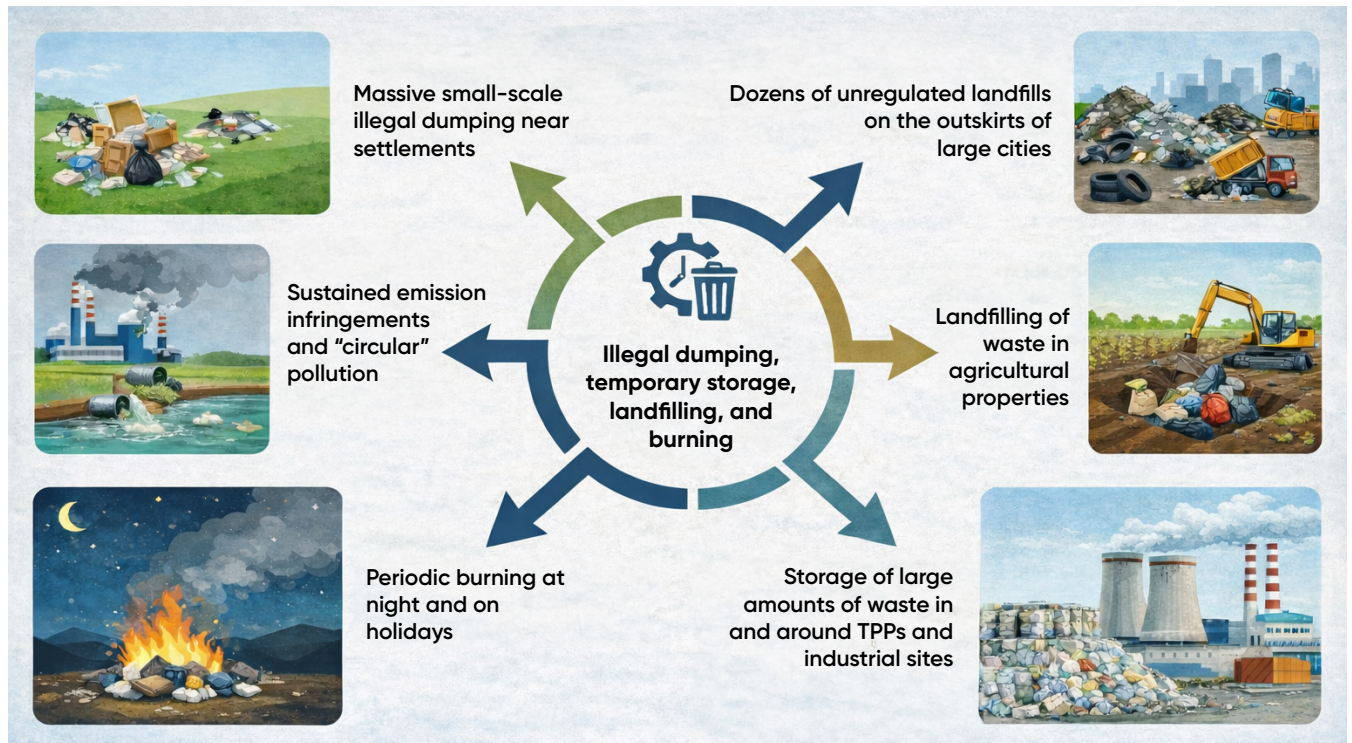
³⁰ Isarin, Baez Camargo, and Cabrejo le Roux, *Dirty deals*, Basel Institute on Governance, 2023.

³¹ Dutch National Police, *Environmental Crime Threat Assessment 2024*, Strategic Environmental Chamber, 2024.

³² Btvnews.bg, „Гори сметище между кварталите “Младост” и “Горубляне” в София” [A landfill is burning between the Mladost and Gorublyane regions of Sofia], 15 September 2025.

ed to similar unregulated landfills.^{33,34} In a number of cases, these types of fires were deliberately caused in order to reduce the volume of illegally dumped waste and subsequently allow new quantities to be dumped.

Figure 2. Examples of Illegal Waste Management in Bulgaria



Source: Center for the Study of Democracy.

The longstanding paradigm of unauthorized waste disposal in Bulgaria is characterized by the widespread proliferation of illicit landfills across urban peripheries, rural hinterlands, and ecologically sensitive zones such as riverbeds and ravines. **Prior to the implementation of more rigorous environmental governance protocols, international analyses reported over 240 unregulated dumps in the capital alone.**³⁵ A similar situation is observed in smaller municipalities: local investigations in the municipality of Septemvri describe over 160 sites for illegal dumping of construction and household waste, including burying mixed waste in a ravine in the immediate vicinity of agricultural areas.

Such practices rarely lead to criminal proceedings; most often the result is an administrative act and subsequent, partial clean-up, which leaves impunity as the dominant message to the other participants.

³³ Dariknews.bg, „Пожар на незаконно сметище обгази част от Пловдив“ [A fire in an illegal landfill blankets parts of Plovdiv], 23 September 2025.

³⁴ 24chasa.bg, „Откриха 3 дка незаконно сметище след сигнал за пожар, обгазил Кичюка“ [Illegal 3-acre landfill discovered after fire blankets Kichuka in smoke], 24 September 2025.

³⁵ OECD, „Cleaning up our act: How Sofia is transforming waste management“, OECD Environment Blog, 19 November 2018.

Criminal networks, both local and cross-border, take advantage of the existing infrastructure, the culture of dumping and the lack of sufficiently modern alternatives to carry out their illegal activities, which makes the country vulnerable to illegal practices.

The riskier level of illegal dumping is manifested in the burial of large quantities of waste, including potentially hazardous waste, on agricultural properties or near towns and villages. In the area of Cherven Bryag and the village of Ruptsi, the prosecutor's office uncovered the burial of over 120 tonnes of waste on private land without a permit, where the origin and composition of the waste remained unclear for a long time.³⁶ Such cases are a symptom of a more systemic problem: **lack of prior tracking of construction and industrial waste flows, limited capacity for surprise inspections and low probability of real sanctions.**

There are several large illegal landfills in Sofia for the disposal of excavated materials and construction materials. According to data from the Sofia Inspectorate, the five largest ones are: near the Gorublyane district (Mladost district), near the Suhodol district, in the Pancharevo district, in the Krasna Polyana district (on agricultural lands) and near the village of Botunets. Police investigations indicate that there are **at least three active large criminal networks dealing with the illegal dumping of excavated materials** and operating illegal dumps. It is not clear exactly when these criminal networks started their activities, but there are indications they have operated for at least 5 years (i.e. approximately since the beginning of the new construction boom in Sofia). According to the Sofia Inspectorate, the total number of illegal dumps is about 200.

The networks for the illegal dumping of excavated materials and construction materials are driven by the desire for quick profit and operate through legally registered companies. Behind each of the criminal schemes stands **an organiser who provides plots of agricultural land for “dumping sites”, very often through legal lease agreements with their owners.** The most emblematic example of a criminal network operating such an unregulated landfill is associated with the capital's “Gorublyane” district (Box 1). According to experts, combating these networks requires daily and close cooperation between multiple public entities: the Ministry of Interior, the State Inspectorate for Traffic Safety, the Ministry of Agriculture (specifically the Municipal Agricultural Services) and the Regional Inspectorate for Environmental Protection and Water Resources-Sofia, which must control transport companies and landfill sites. **A key role is also played by the regional authorities** issuing construction permits and waste transportation documents, as well as the Oversight of Construction Waste Management of the Council of Ministers.

Unregulated burning completes this picture, with some studies³⁷ reporting illegal burning as a separate and persistent category of waste crime, with a significant impact on air quality and competition in the sector. In Bulgaria,

³⁶ Prosecutor's Office of the Republic of Bulgaria, Press release: „Над 120 тона достигна откритото количество незаконно заровен боклук край Червен бряг и с. Рупци“ [The detected illicit waste buried at Cherven Bryag and Ruptsi is over 120 tonnes]. 3 July 2020.

³⁷ Parr, and Hess, *National waste crime survey 2025: results and findings*, UK Environment Agency, 2025.

although the number of proven cases is limited, the combination of citizen reports, journalistic investigations and complaints to the European Commission outlines **the risk of burning of unclearly classified waste in thermal power plants and other industrial installations**. Some journalistic investigations³⁸ have described the accumulation of large quantities of waste around the Bobov Dol TPP, Brickel and other facilities -associated in the media with the same economic circle- as well as periodic burning of these flows, often at night or on weekends, when control is weakest. Citizens in the affected settlements speak of a constant “complex smog” – a mixture of coal smoke, biomass and the smell of burnt plastic, which is difficult to associate with a specific source, but clearly signals a problem in the fuel base.

Box 1. The Largest Unregulated Landfill Near Sofia: The Case of Gorublyane

The Gorublyane landfill represents a primary case study illustrating the emergence of a sophisticated criminal enterprise that exploits systematic legislative loopholes and institutional fragmentation. This operation capitalised on the persistent lack of coordination between oversight bodies and various deficiencies within the Sofia Municipality’s administrative framework—issues that still remain unresolved.

The basis of the scheme is the need to dispose of huge amounts of soil and construction waste generated by the intensive construction in the capital. According to the regulations approved by the Sofia Municipality, excavated soil and construction materials must be deposited at special sites for the treatment of construction waste, such as the municipal one in Vrazhdebna, managed by the municipal company Sofinvest. Since the fees of these specialised landfills are relatively high, construction companies are looking for alternatives to reduce their costs. Notorious criminal entrepreneurs from the recent past have offered such an “alternative cheap solution”.

On the outskirts of the Gorublyane (Mladost district), there are a large number of agricultural plots intended for purchase by the Sofia Municipality for the planned new East Park, at low prices. The property owners consider the assessments unfair and appeal the decisions, while in the meantime allowing the “entrepreneurs” in question to dump soil from construction projects onto these private fields. As a result, a hill of soil about 11 meters high has emerged in the area of the “dump”. The attempt of the Sofia Inspectorate to stop this scheme by imposing administrative sanctions has so far been unsuccessful.

According to police investigations, the illegal landfill near Gorublyane covers at least 40 plots. Data indicate that about 200 trucks are unloaded there daily. The informal fee collected by the landfill operators for the service is 80 BGN (€40) per trip, which is half the fee at the legitimate municipal depot in Vrazhdebna. Thus, the criminal network generates a turnover of about 16,000 BGN per day or 480,000 BGN per month.

The success of the scheme is due to the effective utilization of legal loopholes. The chain starts with construction companies that hire transporters to move the excavated material. At the second level, there are about 10-12 specialised transport companies that take orders and transport the soil to the illegal landfill in Gorublyane. These companies have an agreement with the organiser of the scheme, who in turn has concluded contracts with the landowners. When inspectors from the Sofia Inspectorate try to stop the trucks, the drivers do not

³⁸ Levy, Tchobanov, and Stoyanov, *The garbage that is suffocating Bulgaria*, BIRD, 2 January 2021.

obey if there is no police present. In cases where the inspectorate organises actions together with Traffic Police, drivers are warned in advance and they pause transporting. When stopped by police, the drivers usually claim that they are simply contractors, and the acts of violation drawn up against the companies often cannot be served and expire after 6 months.

These practices are aggravated by the intertwining between local authorities and operators. A journalistic investigation into the municipality of Galabovo shows how the municipality effectively becomes a logistics intermediary for RDF waste arriving at the port of Burgas, bearing the costs of transporting it to the Brickel TPP, which accepts it as “fuel”. Formally, this is presented as part of efforts to recover and reduce landfilling, but in practice it transfers significant environmental and health risks to the local population, without adequate public transparency about the composition and quantities of waste burned. **This type of dependency between municipalities and operators is indicative of the broader risk of “capture” of policies and control functions by private interests.**

Illegal dumping and incineration can be viewed in three interconnected layers. First, the massive, small-scale illegal dumping and burning of waste by households and small businesses, which forms a “background” of normalised non-compliance. Second, large unregulated storage and disposal sites, often associated with complex logistics chains and obscure origins of waste. Third, the use of industrial facilities – mainly thermal power plants – for waste incineration, where legal instruments such as complex permits and recovery contracts serve as a cover for potentially criminal practices.^{39,40,41}

Illegal Cross-Border Waste Trafficking

Cross-border waste trafficking is a complex form of crime, often involving organised networks, and is carried out through the falsification of documents and the abuse of legal and regulatory loopholes. Methods include falsely declaring hazardous waste as non-hazardous, disguising waste as second-hand goods or using misleading classification codes.

Cross-border waste trafficking is less visible to local communities, but is central to European assessments of environmental crime. The European Multidisciplinary Platform Against Criminal Threats (EMPACT), identifies the Union as simultaneously a point of origin, a destination, and a transit corridor for the illicit trafficking of waste. The report underscores the acute

³⁹ Isarin, Baez Camargo, and Cabrejo le Roux, *Dirty deals*, Basel Institute on Governance, 2023.

⁴⁰ Dutch National Police, *Environmental Crime Threat Assessment 2024*, Strategic Environmental Chamber, 2024.

⁴¹ Bulgaria, Ministry of Environment and Water, „ТЕЦ „Бобов дол“ с окончателно потвърдена от Административен съд санкция, наложена от РИОСВ – София“ [Bobov Dol TPP’s sanction imposed by the Regional Environment Inspectorate is confirmed by the Administrative Court], 05 October 2023; Районен съд – Дупница, Решение по НАХД № 123/2022 г. [Court decision of the Dupnitsa Regional Court]; Simeonova, E., „Има ли чадър?“ Как ТЕЦ „Брикел“ получи глоби за 1 милион, но плати само 6500“ [Is there an umbrella over the Brickel TPP? How it was fined to pay 1 million but only paid 6,500 in fines], *Free Europe*, 13 March 2025.

vulnerability of Eastern European Member States, which increasingly serve as primary catchment areas for diverted waste streams emanating from Western Europe.⁴² Criminal networks are increasingly operating from within the legal sector – through licensed collection, trading and recycling companies, brokers and intermediaries, who use complex corporate and logistical structures to disguise the origin and final destination of waste flows.⁴³

In practice, this is done in several stages. First, the waste is “laundered” through document fraud, whereby hazardous or heavily contaminated streams are described as non-hazardous, as secondary raw materials or as second-hand products. For waste with a high negative value, such as hazardous industrial waste, the incentive to reduce costs by exporting to countries with lower standards is extremely strong, and the temptation to use misleading codes and incomplete declarations is structurally embedded in the business.⁴⁴ The Dutch assessment of plastic waste crime⁴⁵ shows how low-quality, mixed plastic streams repeatedly change hands, moving from large companies to small traders and intermediaries who direct them to countries in Eastern Europe and further to Asia.

Europol’s global trends analysis⁴⁶ indicates that **China’s ban on the import of plastic waste in 2018 has served as a catalyst that has dramatically changed the global landscape of waste trafficking.** This decision has forced traders to look for new markets and destinations in other parts of the world, including Eastern Europe and countries such as Bulgaria and Turkey. This process creates new and unforeseen challenges for local law enforcement agencies, which have to deal with increased waste flows and complex schemes for their transportation.

Bulgaria appears in this picture most clearly in the scandals surrounding the import of waste from Italy. An outstanding example is the trafficking of 9,000 tonnes of baled waste from the Naples region, originally intended for Constanta, and then redirected to Svishtov and Pleven, and later to Varna.⁴⁷ Formally, the waste was declared as raw material for the production of construction materials, but the destination site lacks installations, infrastructure and capacity for such activity. According to the prosecutor’s office, this constitutes illegal storage, in which “recycling” takes place only on paper.

In parallel, in 2020, dozens of containers of waste from Italy were found at the port of Varna, imported in violation of the rules for cross-border transport (Box 2). Following public pressure and coordination with the Italian author-

⁴² Council of the European Union, *EMPACT 2024 Operational Action Plan – Environmental Crime*, Brussels, 2023.

⁴³ Europol, *European Union Serious and Organised Crime Threat Assessment*, Publications Office of the European Union, 2025.

⁴⁴ Isarin, Baez Camargo, and Cabrejo le Roux, *Dirty deals*, Basel Institute on Governance, 2023.

⁴⁵ Dutch National Police, *Environmental Crime Threat Assessment 2024*, Strategic Environmental Chamber, 2024.

⁴⁶ Europol, *Environmental Crime in the Age of Climate Change – Threat assessment 2022*, Luxembourg: Publications Office of the European Union, 2022.

⁴⁷ Bivol.bg, *WasteGate companies investigated for ties with Camorra and Ndrangheta deliver 9000 metric tons of waste to Bulgaria*, 5 January 2020.

ities, some of these shipments were returned, illustrating how **what was initially presented as legal transport can be reclassified as illegal trafficking as a result of inspections and international cooperation**. The cases have taken on an additional political dimension with the arrest and charges against a deputy minister of the environment and the indictment of a former minister for participating in or aiding such schemes.⁴⁸

The cross-border aspect is not limited to Italian waste. Europol investigations and operations have identified **the Balkans as a transit corridor for illegal shipments of construction and other hazardous waste to third countries, with countries such as Bulgaria acting as a stopover point for temporary storage, reclassification and resale**.^{49,50} Bulgaria's participation in international operations such as TOX'23,⁵¹ coordinated by SELEC and targeting the illegal management and trafficking of hazardous waste, is a sign that national authorities are beginning to treat these practices as part of a broader picture of organised crime and a threat to regional security.

Box 2. The 'Italian Garbage' - the WasteGate Affair

In 2018–2019, thousands of tonnes of baled waste from Italy began to arrive in Bulgaria, formally declared as refuse derived fuel (RDF) and raw material for the production of construction materials or for utilization as fuel in thermal power plants. Journalistic investigations show that some of the companies in the chain are being investigated in Italy for connections with the Camorra and the 'Ndrangheta crime syndicates. Additionally, the sites in Svishtov and Pleven, which according to documents are supposed to process the waste, have no real technical capacity to do this. In the same period, dozens of waste containers were detained in the port of Varna, the composition of which did not meet the declared characteristics and codes.

In response, the Italian carabinieri and the Bulgarian prosecutor's office began parallel investigations into illegal cross-border transport, illegal storage and utilization of waste. In Bulgaria, pre-trial proceedings have been initiated for an organised criminal group, within which the Deputy Minister of Environment and Water, a former minister and related businessmen have been brought as defendants. The charges include facilitating illegal imports through the inaction of control authorities, manipulating permit regimes and allowing waste to be stored and incinerated in violation of the environmental legislation.

As a result of the investigations, some of the containers of Italian waste were re-exported back to Italy, after an official finding of non-compliance with the requirements of the Waste Shipment Regulation. The courts confirmed a number of sanctions against the Bobov Dol TPP and related operators for violations of complex permits and for unregulated waste treatment, including fines of BGN 100,000 each and the cancelling of a permit for "experimental" burning. The WasteGate case was a telling example of the intertwining of cross-border traffic of waste, the use of legal installations as an end point and corrupt practices at the high levels of administration.

⁴⁸ European Union Forum of Judges for the Environment, *Climate law and litigation – National report: Bulgaria*. Brussels: EUFJE, 2022.

⁴⁹ Dutch National Police, *Environmental Crime Threat Assessment 2024*, Strategic Environmental Chamber, 2024.

⁵⁰ Europol, *European Union Serious and Organised Crime Threat Assessment*, Publications Office of the European Union, 2025.

⁵¹ Bulgaria, Ministry of Environment and Water, Press release: „България се включи в международната операция TOX'23“ [Bulgaria participated in the international TOX'23 operation], 1 November 2023.

The pattern outlined thus far demonstrates that **cross-border trafficking, illegal dumping and incineration rarely exist in isolation**. The usual scenario starts with waste generated in a country with high treatment costs, then passing through a series of intermediaries and transfers, acquiring an increasingly “clean” documentary profile at each step, and finally disappearing into landfills, warehouses or incinerators in countries with weaker controls, such as Bulgaria.^{52,53,54,55}

Illegal Practices of Legal Operators and Waste Generators

In addition to obvious illegal practices, such as illegal dumping, burial and cross-border trafficking, a less visible category stands out in the waste-management system – fraud and violations committed by formally “legal” participants. These are operators with permits, concessionaires, municipal contractors, as well as large waste generators such as hospitals and industrial enterprises. International assessments of waste crime^{56,57} emphasize that a large part of the damage to the environment and the budget is generated precisely within the legal system, by manipulating the classification, quantities and quality of waste, and not only through openly illegal landfills.

In Bulgaria, data from the Sofia Municipality supports a clear distinction between two main types of non-compliant practices. The first is related to waste generators, especially in sensitive sectors such as healthcare. Hospitals and other healthcare facilities routinely mix hazardous hospital waste with household waste – that is, infectious materials, sharps or chemicals are disposed of together with the general flow, which is collected and treated as ordinary household waste. The reason is that hazardous waste is more expensive to treat and is subject to stricter control, while hiding it in the household flow reduces costs and the likelihood of inspection (Box 3).⁵⁸ This transfers the risk to cleaning workers, treatment plants and ultimately to the environment and public health, without being reflected in official hazardous waste statistics.

⁵² Isarin, Baez Camargo, and Cabrejo le Roux, *Dirty deals*, Basel Institute on Governance, 2023.

⁵³ Dutch National Police, *Environmental Crime Threat Assessment 2024*, Strategic Environmental Chamber, 2024.

⁵⁴ Ibid.

⁵⁵ Europol, *European Union Serious and Organised Crime Threat Assessment*, Publications Office of the European Union, 2025.

⁵⁶ Parr, and Hess, *National waste crime survey 2025: results and findings*, UK Environment Agency, 2025.

⁵⁷ Isarin, Baez Camargo, and Cabrejo le Roux, *Dirty deals*, Basel Institute on Governance, 2023.

⁵⁸ Bulgaria, Sofia Municipality, Press release: „Столичната община преустановява приемането на отпадъци от болниците след пореден случай на нерегламентирано смесване на болнични отпадъци“ [Sofia Council cancels hospital waste reception after another case of irregular mixing of medical waste], 1 April 2025.

Box 3. Mixing of Hazardous and Non-Hazardous Waste: The St. Catherine Case

In April 2025, the Sofia Inspectorate found that the St. Catherine University Hospital systematically disposed of hazardous hospital waste – used needles, syringes, bloody gauze and other infectious materials – together with ordinary household waste. During an on-site inspection, the inspectors found that instead of being handed over to specialized companies for incineration, hospital waste was mixed with ordinary household waste and placed in bags, without the mandatory identification stickers, and was left next to the garbage containers or directly in the hospital yard to be removed by municipal trucks.

After an administrative act and a penal decree, the hospital appealed, but the Sofia District Court confirmed the violation of the Waste Management Act and imposed a property penalty of 20,000 BGN on the hospital. The decision is among the first judicially confirmed cases in Sofia and comes against the backdrop of dozens of similar signals in the previous months. After the Sofia Waste Treatment Plant temporarily stopped accepting waste from hospitals in Sofia in April 2025, the violations found decreased sharply. The case of the University Hospital “St. Catherine” becomes a clear example of the risks hidden by the lack of control in the treatment of hazardous medical waste in the capital.

The second type concerns waste collection and disposal contractors. Here, the **manipulation is aimed at the quantities and origin of the waste**. According to data from the Sofia Municipality, internal inspections have identified cases in which waste from other settlements is brought to the territory of the capital in order to be reported as part of the volume under the contract. Another manipulation is the intentional “wetting” of the waste in order to increase the reported tonnage on which the payment is based.⁵⁹ Additionally, there are cases in which a certain type of waste is reported as a more expensive category – for example, bulky waste or specific fractions – without actually meeting the requirements for its separate collection and treatment. In practice, this means that citizens pay for a service that is either not provided or is provided in a volume significantly smaller than the reported one.

These practices formally often look like a “contract violation” or an administrative offence, but in essence they represent a **combination of document fraud, abuse of trust and improper spending of public funds**. They undermine incentives for separate collection and proper treatment of waste, distort competition between operators and make capacity planning difficult – because officially reported volumes do not reflect actual generation and collection. From a criminal law perspective, this is where environmental crime and classic economic crime meet: in the actions of seemingly “correct” operators who use their privileged position in the system to extract additional profit at the expense of the environment and the state budget.

⁵⁹ Gorcheva, S., „След скандала с боклука: Как медицински отпадъци попадат в камиони с битова смет“ [After the waste scandal: how medical waste ends up in trucks carrying household waste], *bTV*, 4 April 2025.

CRIMINAL NETWORKS TACTICS

When viewed in dynamics, the described categories of waste crime clearly show that they are based on similar operational techniques. Criminal networks rarely operate outside the legal sector; on the contrary, they use it as a basic infrastructure. Europol describes waste crime as an “**embedded risk**” in certain segments of the industry, in which licenses, permits and corporate structures serve both as an instrument of legitimacy and as a shield against control.⁶⁰ Corruption and clientelism at different levels – public administration, local governments and regulatory authorities – are often a condition for the sustainability of such schemes.⁶¹

The typical development of a criminal scheme begins with an offer of a “**cheap solution**” to the owner of the waste: a significantly lower price for collection and treatment or the possibility of export to free up capacity. Then a **network of intermediaries** gets involved – traders, brokers, transport companies, owners of sites and installations – some of whom operate on the edge of the law, while others are consciously involved in illegal activities. Each participant adds its own margin, but the overall profit is generated by avoiding the costs of proper treatment. For these chains to function, a high level of control over information and documentation is required. This explains why criminal networks seek partnerships with regulatory and legal experts who know the details of national and European requirements and can “optimize” the classification, routing and final treatment of waste.^{62,63} Some of these “services” include preparing convincing-looking but misleading compositional analyses, selecting convenient waste catalogue codes and structuring the chain of companies in a way that blurs responsibility.

In countries like Bulgaria, where the waste sector is heavily dependent on municipal contracts and concessions, organised crime has an additional incentive to influence local politics. **The ability to control the flow of waste to certain sites or installations essentially means a guaranteed income and a stable source of money for laundering.** When this is combined with weak control capacity, unjustifiably low administrative sanctions and a low likelihood of prosecution, the waste sector becomes an attractive “gateway” between the legal and illegal economies.⁶⁴ In this context, individual attempts by officials to exercise control and stop such illegal practices sometimes result in the use of violence by offenders, which is a clear example of the results of the lack of effective law enforcement in recent years (Box 4).

⁶⁰ Isarin, Baez Camargo, and Cabrejo le Roux, *Dirty deals*, Basel Institute on Governance, 2023.

⁶¹ Ibid.

⁶² Favarin, Screen, and Axinte, *Waste crime investigation phases and the role of emerging technologies*, Università Cattolica del Sacro Cuore, 2025.

⁶³ Dutch National Police, *Environmental Crime Threat Assessment 2024*, Strategic Environmental Chamber, 2024.

⁶⁴ Europol, *European Union Serious and Organised Crime Threat Assessment*, Publications Office of the European Union, 2025.

Box 4. The Attack on the Mayor of Duskot over an Act for Illegally Dumped Waste

On November 3, 2025, the mayor of the Pavliken village of Duskot, Nikolay Mitev, was attacked and beaten in the town hall by a resident to whom he had previously issued an act for the illegal dumping of construction and household waste. Days before the incident, the mayor discovered newly dumped construction waste at a site for green and biodegradable waste that had recently been cleaned, and initially issued a verbal warning to the perpetrator. During a subsequent inspection, after waste had been dumped again at the same location, Mitev issued an act to the 36-year-old owner of the truck that had brought the waste.

A little later that day, the perpetrator went to the town hall under the pretext of a “conversation” regarding the act. The dispute escalated into a physical assault – the mayor was hit in the face and body in front of a police officer, who witnessed the incident. The victim was examined by a forensic doctor in Veliko Tarnovo, who found him to have suffered minor bodily injury. The offender was detained for 24 hours, and the District Prosecutor’s Office charged him with causing minor bodily injury to an official in the performance of his duties – a crime for which the law provides for up to three years of imprisonment.

For the illegal disposal of waste itself, the Pavlikeni municipal ordinance provides for an administrative fine of between 150 and 500 BGN, which will be imposed separately. The case provoked a public reaction: the mayor of Pavlikeni Municipality Emanuil Manolov published a position in support of the attacked mayor and condemned the aggression against local government representatives, and national media emphasized the paradox that an attempt to implement waste management rules can lead to physical violence even when the very sanctions for the violation are nominal.

Unlike other forms of serious and organised crime, **waste-related crime is usually committed by legal entities rather than individuals**. This is confirmed by the latest Europol report,⁶⁵ which states that waste crime networks typically operate through legitimate companies to conceal and facilitate their illegal activities. The strategy of criminal networks involves gaining control of existing companies or creating new ones to serve as a front for illegal operations. These networks, in many cases, employ sophisticated methods that often intertwine legal economic activities with document forgery and corruption as a tool to circumvent existing rules and evade law enforcement.

⁶⁵ Europol, *European Union Serious and Organised Crime Threat Assessment*, Publications Office of the European Union, 2025.

Use of Legally Registered Companies

The profile of companies involved in criminal networks related to waste crimes in Bulgaria generally coincides with the various participants in the chain from generation to disposal of waste described in the Waste Management Act:

- **unscrupulous waste generators** – in recent years, companies from the construction sector, which has been experiencing sustained growth over the past ten years, especially in Sofia, have been actively involved here. This is partly explained by the fact that the construction sector remains one of the leading sectors in terms of grey economic practices - and avoiding high fees for the disposal of construction waste and soil is only one of the ways to reduce costs by circumventing statutory obligations.⁶⁶
- **unscrupulous specialised transport companies** – here again there are a number of examples of transport companies specialising in the transportation of excavated soil and construction materials, which serve the networks for the unregulated disposal of construction waste.
- **unscrupulous companies engaged in the waste collection and transportation sector** – this category also includes companies that are officially employed in the household and industrial waste collection and transportation sector. These companies usually have expert knowledge in the field of waste regulations, which allows them to take advantage of legal and institutional gaps – to bypass control and falsify documents with a high degree of credibility in order to generate additional profits.
- **unscrupulous companies engaged in waste recovery or disposal** – unlike the other three categories, this category most often includes companies specifically created in connection with the conduct of criminal activities (e.g. unregulated waste disposal). In cases related to illegal dumping of construction waste and excavated materials, they also play the role of “brokers” connecting construction companies, specialized transport companies, corrupt state and municipal officials and owners of land on which unregulated landfills are formed.

Europol found that criminal networks dealing with waste crimes in EU countries often use specially created companies as fronts and, after a short period of operation, close them down in order to register new ones in their place.⁶⁷ Unlike other EU countries, in Bulgaria there are cases where companies, even after imposing sanctions for violating environmental legislation, operate for years. For example, according to the Sofia Inspectorate, one of the companies engaged in the recovery of construction waste in Sofia has documented violations since 2016, yet continues to engage in unregulated dumping of soil and construction waste.

⁶⁶ Bulgarian Chamber of Commerce and Industry, „България е с най-висок дял на сивата икономика и на плащанията в брой в ЕС“ [Bulgaria has the largest share of grey economy and cash payments in the EU], 9 April 2025.

⁶⁷ Europol, *European Union Serious and Organised Crime Threat Assessment*, Publications Office of the European Union, 2025.

Document Forgery

Document forgery is one of the main methods used by criminal networks to commit waste crime. The National Waste Crime Survey in England identified deliberate misdescription of waste as the most common type of crime – around a quarter of the organisations surveyed reported such practices in the sector.⁶⁸ In the Netherlands, where the plastic waste chain was analysed in detail, inspectors described numerous cases of reclassification of contaminated plastics as cleaner grades, use of different documents on departure and arrival and even issuing recycling certificates for waste that only exists on paper.⁶⁹

Criminals declare hazardous waste as non-hazardous, waste as second-hand goods or use misleading classification codes to avoid strict controls and high disposal fees. Document forgery is a key method, both in cross-border and domestic waste traffic. In 2020, several major cases of trafficking in hazardous and non-hazardous waste declared with altered customs codes became known in Bulgaria, with one case involving sanitary and medical waste declared as textiles.⁷⁰ Another more recent case is from 2024, when the Sofia Municipality raised the alarm about how a number of hospitals in the city were mixing non-hazardous with hazardous hospital waste (see Box 3) whilst at the same time were submitting false declarations that they were transferring household waste.⁷¹ The unregulated dumping of excavation materials and construction materials is often covered up with false permits from the Ministry of Agriculture for land reclamation.⁷²

The case of the Sofia Waste Treatment Plant, which is financed with European funds, is emblematic. The internal inspection conducted by the newly elected administration of Sofia Municipality in 2024 found numerous violations by the selected private operator of the plant, including indications of potential crimes such as document fraud to conceal the actual quantities of recycled waste, the waste of public funds and illegal waste disposal. The violations identified also included non-fulfilment of the grant agreement under which the funds for construction were received, and if the violations are proven, they are subject to sanctions by the European Commission. Sofia Municipality filed a report first to the Prosecutor's Office of the Republic of Bulgaria, and subsequently to the European Prosecutor's office, for embezzlement of public funds, misuse of European funds, use of false and untrue documents and malfeasance in office (Box 5).⁷³

⁶⁸ Parr, and Hess, *National waste crime survey 2025: results and findings*, UK Environment Agency, 2025.

⁶⁹ Dutch National Police, *Environmental Crime Threat Assessment 2024*, Strategic Environmental Chamber, 2024.

⁷⁰ News.bg, „Върнахме на Италия 22 т отпадък, внесен незаконно“ [Twenty-two tonnes of illegally imported waste returned to Italy], 11 January 2021.

⁷¹ Vasileva, T., „Защо болниците в София смесват медицински с битови отпадъци?“ [Why hospitals in Sofia mix medical and household waste], BNT, 13 November 2024.

⁷² Anti-Corruption Fund, „Властелините на пръстта: Кой са покровителите на схема за паралелно извозване на строителни отпадъци в София?“ [Lord of the soil: who protects the scheme for parallel dumping of construction waste in Sofia], 5 August 2024.

⁷³ Lateva, Z., „Васил Терзиев сезира европрокуратурата за нарушения в завода за боклука при ГЕРБ“ [Vasil Terziev notifies the European Prosecution Office of violations at the waste processing plant under GERB], *Mediapool.bg*, 1 July 2025.

Box 5. Signal to the European Prosecutor's Office Regarding Violations at the Sofia Waste Treatment Plant

The Mechanical-Biological Waste Treatment Plant in Sofia was built with European funding under the Operational Programme Environment 2007–2013, for a total value of over 345 million BGN. The main condition for receiving and retaining the grant was that in the first five years of operation, at least 9.5% of the incoming waste must be recycled, and that strict European rules for limiting landfilling must be observed.

In 2024, the new municipal administration carried out an inspection of the plant's management contract and established that during the period 2016–2021, instead of separating and recycling plastics, paper and other materials, the contracted private company systematically transported untreated household waste directly to the landfill in the village of Dolni Bogrov. According to estimates by the Sofia Municipality, the company in question received over 13 million BGN (excluding VAT) under contracts concluded through public procurement, without performing the assigned service. At the same time, the data submitted in the official reports to the Sofia Municipality and to the European institutions show that the recycling rate has been achieved. As a result, the landfill was overloaded with more than 200,000 tonnes of waste above the permitted limit, the ban on landfilling recyclable material was violated and the environmental objectives of the project were circumvented. In 2024–2025, the new management of the Sofia Municipality terminated the contracts in question and filed a report with the European Prosecutor's Office due to potential crimes related to European funds, document fraud and illegal waste management, and announced the case in the media. The report claims that through false documents, inaccurate weight data and classification changes, the achievement of the minimum required percentage of recyclable materials of 9.52% was a fraud, and that the actual percentage was significantly lower.

Corrupt Practices

Document fraud is rarely possible without the participation or at least inaction of public authorities. Research in this field clearly demonstrates that corruption can occur at all stages – from policy formulation, through public procurement, to the execution of control.⁷⁴ In some cases, **businesses exert undue influence on the regulatory framework and design of waste-management systems**, so as to minimise requirements and facilitate their avoidance. In other cases, individual inspectors and officials become intermediaries who, in return for payment, “guarantee” favourable inspections or delayed application of sanctions. Corruption is a critical factor that allows schemes for illegal processing and dumping of waste to be successfully carried out.

The United Nations Office on Drugs and Crime⁷⁵ and Europol⁷⁶, in their recent reports, emphasize that corruption is an integral part of the network of criminal activity. Bribery of officials ensures the unhindered passage of illegal waste cargoes across borders and ports. There are very few investigations

⁷⁴ Isarin, Baez Camargo, and Cabrejo le Roux, *Dirty deals*, Basel Institute on Governance, 2023.

⁷⁵ UNODC, *Combating waste trafficking: A guide to good legislative practices*, UNODC, 2022.

⁷⁶ Europol, *Environmental crime in the age of climate change – 2022 threat assessment*, Luxembourg: Publications Office of the European Union, 2022.

and publicly known cases of corruption related to waste crimes in Bulgaria, which speaks more of a lack of sufficient investigations than of low levels of corruption.

The Bulgarian cases surrounding the import and incineration of Italian waste show how **documentary fraud and corruption go hand in hand**. Investigations reveal numerous instances of suspicious behaviour, such as: companies with minimal operational capacity but with high turnover and an apparent key role in the transport and treatment chain; companies reporting production activities for which there is neither equipment nor personnel on site; control bodies initially fail to detect violations, but subsequently are pressed to register them, under pressure from the prosecutor's office, the media or civil society organisations. This dynamic suggests that corruption is not an isolated incident, but part of a broader ecosystem in which the law is applied selectively.

One of the most famous examples is the investigation against a criminal group involving a former deputy minister of the environment and officials from several regional inspectorates for the environment and water in the country (Box 6).⁷⁷ The accusations against such high-ranking government officials for participating in schemes involving the illegal import and management of waste from Italy demonstrate that a level has been reached where **private and criminal interests have real access to decision-making processes and control mechanisms**. Inspections in four regions of the country have found nearly 8,000 tonnes of hazardous waste, which also reveals the scale of the problem.

Box 6. Cross-Border Trafficking of Hazardous Waste and the Use of Corruption

In June 2020, the Prosecutor's Office of the Republic of Bulgaria, in close cooperation with Eurojust, announced the start of one of the largest investigations into trafficking of hazardous waste and its illegal dumping in Bulgaria. According to the official announcement of the Prosecutor's Office,⁷⁵ in the period January 2014 – May 2020, an organised criminal group, with the participation of former Deputy Minister of the Environment Krasimir Zhivkov, directors of the Regional Inspectorate for Environment and Water and managers of shell companies, illegally imported, stored and traded 16,756 tonnes of waste, of which 7,756 tonnes were hazardous (such as polyethylene separators from batteries with code 19 12 11*). The waste was found in four districts: Pleven (Cherven Bryag, Ruptsi, Pleven – over 14,000 tonnes), Montana (Lom – 501 tonnes), Shumen (751 tonnes) and Sofia (Kremikovtsi – 1,108 tonnes). The group circumvented EU Regulation No. 1013/2006 through shell companies without real capacity for recovery, supplying waste from Romanian, Italian and Serbian suppliers. In silage pits and excavation pits in Cherven Bryag and the village of Ruptsi, over 30 tonnes of waste were initially found, including parts of batteries, which were identified as hazardous through visual inspection. During subsequent excavations, the amount of detected illegally buried waste

⁷⁷ Prosecutor's Office of the Republic of Bulgaria, „7 756 тона опасни отпадъци са открити при огледи в 4 области във връзка с разследване срещу престъпна група от 11 души, сред които са Атанас Бобоков, Пламен Бобоков и Красимир Живков, бивш зам. министър на околната среда и водите“ [7,756 tonnes of hazardous waste detected in four regions linked to an investigation against an organised criminal group of 11, among the accused Atanas Bobokov, Plamen Bobokov and Krasimir Zhivkov, former deputy minister of environment], 29 September 2020.

exceeded 120 tonnes, with the prosecution specifying that this was only about one third of the total amount generated by companies associated with the defendants. Part of the waste found is related to the activities of companies for recycling lead-acid batteries, and the inspections of the prosecutor's office lead to the seizure of accompanying documentation for transportation and "treatment", which should prove whether and how waste left the plant. In its public statements, the state prosecution emphasizes that the buried waste is in close proximity to agricultural lands and settlements, which poses a risk to the soil and groundwater.

In the specific investigation, charges have been brought against 13 individuals for forming an organised group for the purpose of trafficking and illegal treatment of waste, including hazardous waste. Some of the individuals charged are the former director of the Pleven Regional Inspectorate for Environment and Water, and two of the front persons of shell companies involved. The investigation is being conducted by the Specialised Prosecutor's Office in close cooperation with Eurojust, the Italian and Romanian prosecutors' offices.

This case is a good example of how large-scale crimes against the environment are impossible without **the active complicity of the control authorities**. In this particular example, corruption is used not only as a tool to ensure the inaction of the control authorities, but included the active participation and abuse of office by a high-ranking person in a senior position. The deputy minister in question, with his actions, helped to legalise criminal activity on documents by refusing notifications for the import of hazardous waste, forcing companies to transfer the waste to front companies controlled by the group with storage permits. This has made it possible for hazardous waste not only to be illegally imported, but also illegally deposited, bypassing the mandatory provisions of Bulgarian and European legislation, leading to serious pollution of soil and water.

Another significant case related to corruption and waste crimes comes from 2024 and concerns the dumping of construction waste and excavation masses on over 240 unregulated terrains around Sofia. The case became known thanks to an investigation by a non-governmental organisation,⁷⁸ which was followed by a prosecutor's inspection. The investigation shed light on how the director of the Sofia Inspectorate and the department head of Construction Pollution Oversight concealed the unregulated dumping of construction waste on the territory of Sofia Municipality for at least 9 years, enriching themselves with tens of thousands of leva per month. Throughout this scheme, the senior municipal official organised the imposition of minimal administrative sanctions against the drivers of the trucks transporting the waste, instead of the companies themselves, and thus concealed large-scale violations of the legislation on environmental protection and waste management.

⁷⁸ Anti-Corruption Fund, „Властелините на пръстта: Кой са покровителите на схема за паралелно извозване на строителни отпадъци в София?“ [Lord of the soil: who protects the scheme for parallel dumping of construction waste in Sofia]. 5 August 2024.

The cases of illegal import and treatment of waste from Italy, as well as the cases of illegal dumping of construction waste and soil, demonstrate how waste crimes are inextricably linked to corruption, abuse of office, document fraud and money laundering. This interconnectedness makes combating them extremely difficult, as they undermine not only the environmental, but also the legal and political system of the state.

These cases have a significance that goes beyond specific shipments or landfills. They reveal how the waste sector can become a platform for a deep corruption grip: significant public funds are channelled through it, access to territory and infrastructure is controlled, and complex corporate structures allow profits to be hidden and redirected. Combined with low penalties, weak institutions and limited capacity of investigative bodies, this creates conditions for waste-related crimes to develop not as a peripheral phenomenon, but as a sustainable component of the shadow economy and organised crime in Bulgaria.

VOLUME, REVENUE AND DAMAGE FROM WASTE CRIME

Estimating the Illegal Waste Market

Estimating the volume of illegal waste is challenging due to the lack of systematic data and the clandestine nature of this type of crime, only a small part of which is detected and investigated. A review of academic publications shows that two approaches to estimation are applied: direct and indirect. The direct approach relies on an estimate based on the quantities of illegal waste seized, while the indirect approach relies on available data on the legal sector related to waste management. The two most recent EU estimates of the volume of illegal waste and the revenues generated by related crimes use an indirect approach. Both studies also included estimates for Bulgaria. The first estimate was prepared by the Transcrime research centre in 2017 and estimates the amount of potential revenues from waste crimes at between €45 million and €329 million.⁷⁹ The second estimate is from 2020 and was commissioned by the European Commission, according to which the **illegal proceeds from waste crime in Bulgaria amount to between €46 million and €288 million.**⁸⁰

The methodology for both estimates uses Eurostat data to calculate the gap between the total volume of waste generated and the legally treated, imported or exported waste, attributing the difference to illegal activities, mainly illegal dumping and illegal trafficking. This approach, described in detail by Transcrime,⁸¹ uses as a starting point official Eurostat data on waste generation (from industry and households). From this total volume, the volume of legally treated waste (tracked through treatment facilities and authorized shipments under the Basel Convention and the Waste Shipment Regulation⁸²) is subtracted to determine the gap, i.e. the “missing” waste subject to various illegal activities.

When applying this method to Bulgaria with the latest Eurostat data, the following facts and trends are established:

- **The total volume of waste generated has a tendency to decline** (thanks to the implemented measures for circular economy and recycling of household waste), while **the volume of illegal waste (waste gap) has increased more than 5 times.**
- The share of **illegal waste is also growing rapidly**, which in 2016 was below 5% of the total volume, and in 2022 (the last year for which data is available) is nearly 20%.

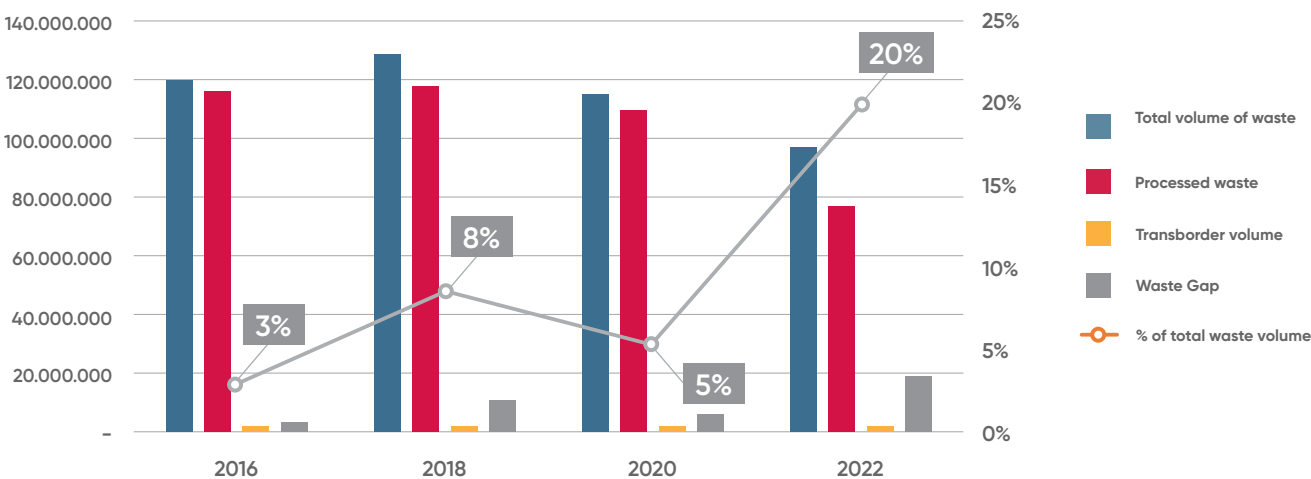
⁷⁹ Meneghini, C. et al., *An exploratory estimate of the extent of illicit waste trafficking in the EU*, Transcrime, 2017.

⁸⁰ EC, DG HOME, CSD, EY, GTI, Optimity Advisors & RAND Europe, *Mapping the risk of serious and organised crime infiltrating legitimate businesses : final report*, Luxembourg: European Publications Office, 2021.

⁸¹ Meneghini et al., *An exploratory estimate of the extent of illicit waste trafficking in the EU*, Transcrime, 2017.

⁸² Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste.

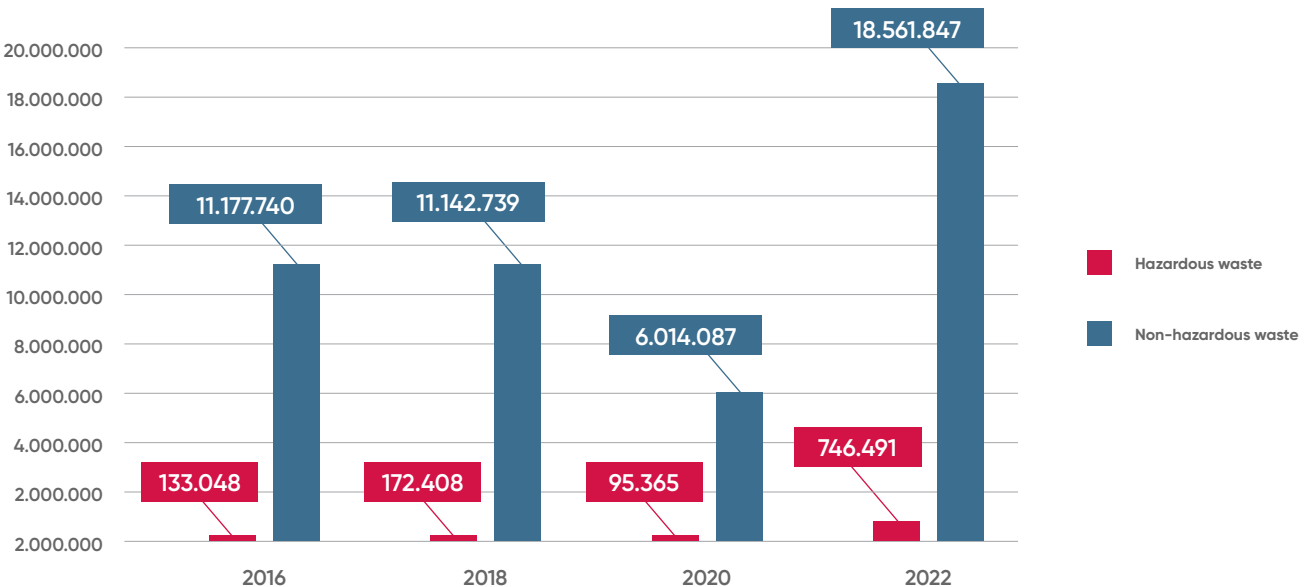
Figure 3. Illegal Waste Volume Estimate, 2016–2022



Source: EUROSTAT and CSD calculations.

- **Hazardous illegal waste is growing faster than non-hazardous waste**, but its share still remains below 4% of the total volume (Figure 4).
- According to estimates of the revenue that criminal organisations derive from a tonne of illegal waste, the **annual revenue for the period 2020-2022 varies between €143 million (minimum estimate) through €520 million (average estimate) to €898 million (high estimate).**

Figure 4. Volume and Structure of Illegal Waste



Source: EUROSTAT and CSD calculations.

Economic and Social Damage

In economic terms, waste crimes **undermine the competitiveness of legal businesses** that invest in complying with environmental standards, while at the same time the state loses significant tax revenues. Due to lower prices, easy accessibility and lack of consequences for participants in the illegal waste business, this option is often attractive to citizens, construction companies and other sectors. According to experts from the Department of Internal Affairs and the Sofia Municipality, the cost of a truckload of soil and construction waste to one of the illegal landfills in Sofia is 80 BGN, which is half the price of the legally regulated municipal landfill near Vrazhdebna. According to data reported in the media, 200 trucks daily dump garbage at the illegal landfill,⁸³ equivalent to approximately between four hundred and five hundred thousand BGN per month - an amount that reaches the grey sector, instead of the municipality.

Along with the lost profits, waste crimes also generate damages - the financial dimensions of which are many times greater. The damages to the Sofia Municipality alone in connection with the illegal landfill in the Poduyane district amount to 2 million BGN, with Sofia Mayor Vasil Terziev specifying that another 240 such landfills were mapped in the past year. The lost revenues for the municipality from illegal waste disposal reduce the funds for waste management, including the purchase of better equipment and improving the service. At the same time, illegal disposal requires additional resources for cleaning and re-cultivation of contaminated sites, as well as treatment of illegally disposed waste.⁸⁴ The financial and economic damages are not only for the municipality: the state also loses significant tax revenues, since companies engaged in illegal waste practices usually also do not register part of their activities and do not declare taxes.

A case in point that clearly illustrates the extent of the damage caused by illegal waste dumping is the flood in the Elenite resort complex in October 2025. An illegal construction waste dump above the complex contributed to the particularly severe consequences of the disaster.⁸⁵ The lack of measures led to construction waste, accumulated in the dump for years, starting to drift downstream during rains, holding back and blocking the drainage of water. Damage worth millions of leva could have been avoided if timely measures had been taken for the dump. In this regard, the chief architect of Sofia warns that during such heavy rainfall there is an increased danger in the Vitosha and Pancharevo regions. She warns that due to the lack of storm sewers and technical infrastructure, as well as the appearance of illegal dumps, which at one point arose next to the dam wall in the village of Pancharevo, the damage could be devastating.⁸⁶

⁸³ Anti-Corruption Fund, „Властелините на пръстта: Кой са покровителите на схемата за паралелно извозване на строителни отпадъци в София?“ [Lord of the soil: who protects the scheme for parallel dumping of construction waste in Sofia], 05 August 2024.

⁸⁴ Sofia.bg, „Васил Терзиев: До момента сме събрали данни за 240 незаконни сметища в София“ [Vasil Terziev: So far we have data on 240 illegal landfills in Sofia], 14 August 2024.

⁸⁵ Mediapool.bg, „Високо 18 м сметище е причина за трагедията в „Елените“, сочи научен анализ“ [An 18-meter high landfill has caused the tragedy in Elenite, a scientific report claims], 19 November 2025.

⁸⁶ BTV, „София е изправена пред сериозен риск от наводнения заради презастрояване“ [Sofia faces a serious risk of flooding due to over-construction], 17 October 2025.

As an EU Member State, Bulgaria is also subject to sanctions by the Court of Justice of the EU for serious violations. With great effort, Bulgaria managed to terminate a 2015 CJEU case (C-145/14)⁸⁷ concerning 113 municipal landfills that did not comply with environmental regulations and failed to meet obligations under the Landfill Directive in 2023 and avoid potential sanctions. Against this background, the newly discovered 240 illegal landfills in Sofia alone in 2024 pose a risk of a new procedure and financial sanctions if timely and adequate measures are not taken.

On a social level, **waste crimes lead to an erosion of public trust in state institutions**. Corruption scandals, such as the investigation against a former deputy minister of the environment in connection with the illegal import of hazardous waste, show that criminals are often protected by high-ranking officials, which creates a sense of impunity and undermines the rule of law. The deteriorating quality of life resulting from littering crimes and the permanent damage to the environment are a clear indicator of the inability of institutions and responsible individuals to protect the public interest and deal with the problem. Such is the case with the illegal landfill in Gorublyane, where instead of the long-promised East Park and green spaces, the residents of the area receive a polluted, unsightly, and unhealthy environment.

Environmental and Health Impacts

The negative impacts of waste crime are multifaceted and cover both the environment and human health, and are difficult to quantify. Illegal dumping and incineration lead to serious air, soil and water pollution by releasing toxic substances and greenhouse gases. Soil contamination with hazardous waste threatens food production, whilst unregulated dumping or incineration of waste near residential areas can become breeding grounds for pathogens and pests, increasing the risk of disease.

Unregulated waste treatment such as dumping, burning, burying, disposal, first of all, **creates numerous health risks**, increasing depending on the proximity of such activities to populated areas. These risks are particularly high in children, since their immune systems are not well developed. Available data show an increased risk of malformations in new-born children of women living in areas where hazardous waste is dumped.⁸⁸

A number of studies have established links between waste incineration and health effects.⁸⁹ Since the studies examine the effects on residents living near legal sites, it can be argued that those associated with illegal incineration may have even more serious consequences due to the lack of supervision and regulation.

⁸⁷ Court of Justice of the European Union, Judgment of 16 July 2015, *Commission v. Bulgaria, Case C-145/14*.

⁸⁸ Kostadinov, K., *Здравни ефекти от изгарянето на отпадъци: Общ преглед*, [Health Effects of Waste Incineration: An Overview], За Земята, September 2024.

⁸⁹ Ibid.

One of the most extensively studied links is that between oncological diseases and pollutants released during the combustion of solid waste fuel (RDF). The examples mentioned establish:

- An increased risk of developing non-Hodgkin lymphoma (2.3 times higher) and mortality from colon cancer (2.1 times higher in men and 2.0 in women), caused by exposure to dioxins;
- The risk of lung cancer (2.14 times higher in women living nearby) is also increased, associated with heavy metal contamination of the soil around waste incineration plants.
- A bio-territorial gradient in the development of lung, stomach and pleural cancers has also been established, depending on the proximity of residents to technological waste incineration sites.
- Other studies indicate that when waste is sorted and recycled before it is burned, the relationship between exposure to waste incineration facilities and the development of cancer is greatly reduced or eliminated. Since specific data are lacking for Bulgaria, the closest example in Europe is from the Italian region of Campania, where illegal dumping of toxic waste is a serious problem associated with record-high cancer mortality rates.⁹⁰

Regarding the illegal dumping of garbage and its consequent decomposition in the sun or burning leads to the release of a number of dangerous pollutants, attracting parasites, mold and releasing clouds of fine particles. Burning garbage poses **a risk to the respiratory system**, with both worsening of existing problems, such as asthma, as well as an increased risk of developing chronic respiratory problems and reduced lung function. Air pollution and fine dust particles up to 10 microns in size cause inflammation in the bronchi, predisposing the development of serious diseases. A particular risk group are workers in waste incineration plants, who often exhibit respiratory symptoms, such as coughing, expectoration and wheezing. Studies have also found significantly lower values of lung function indicators.⁹¹

An example of the effects of waste incineration in Bulgaria is the situation in the city of Devnya, known as the “Valley of Big Chemistry”, where residents have been complaining for years about air pollution caused by the incineration of waste in cement plants.⁹² Despite official data, the local community has been forced to install its own mobile stations to measure air quality, as it doubts the accuracy of state measurements. This fact is indicative of deep social injustice and demonstrates the failure of state institutions to protect their citizens.

Waste crimes are directly related to environmental crimes and **environmental damage**. The use of prohibited chemicals for waste treatment, as well as

⁹⁰ Rando, F., “Eco-mafia: Environmental crimes and toxicity in Italy”, NCT-CBNW, 2024.

⁹¹ Siddiqua, A. et al., “An overview of the environmental pollution and health effects associated with waste landfilling and open dumping”, *Environmental Science and Pollution Research* 29, 58514–58536, 2022.

⁹² Bnr.bg, „Дишай, Девня“ – възможната (не) възможна промяна” [Devnya, breath! - the possible (im)possible change], 11 March 2021.

the incineration of waste, releases dangerous pollutants such as dioxins and furans as a result of chemical reactions and incomplete combustion. Their release in the form of gas, steam, drops, dust, and ash worsens the quality of the air and soil that have come into contact with the harmful substances. Even a small concentration of dioxins or furans entering the human body (through meat, fish, dairy products, etc.) poses a health hazard - since they are not excreted in the urine, but accumulate in the blood, adipose tissue and breast milk. It is for this reason that future and new-born children are also at risk, indirectly exposed to the effects of the substances through the placenta and the mother's breast milk.^{93,94}

Waste crimes also pose a danger to surface and groundwater. The ingress of and hazardous chemicals in rivers, lakes, streams and other bodies of water harm ecosystems and make water unfit for consumption. Water pollution is particularly risky because pollution spreads far beyond unregulated waste sites, making it difficult to control the problem.⁹⁵ An example of such a phenomenon is the recently discovered illegal landfill near the Tundzha River. This is not only used to dump car tires, fluids and other waste, also used to burn cables to extract copper and other metals for scrap as well.⁹⁶ Dozens of tires were found in the riverbed, and accumulations of burned plastic, fluids and oils have flown into the river. Eyewitnesses claim to have found remnants of spilled antifreeze, that the area has also been used to destroy refrigerators and computers, and that they have seen vehicles pouring battery acid directly into the river.⁹⁷ Despite the river being on the brink of an ecological disaster, and signals being sent to municipalities and agencies for months (according to a municipal councillor from Sliven), significant action has not been taken, leaving the environmental and health risks to worsen.

Illegal dumping of garbage causes serious damage to the soil by polluting it, degrading its quality, and devaluing natural resources. Toxic substances such as heavy metals, chemicals, solvents penetrate the soil, making it unsuitable for agriculture. Common problems are the unregulated disposal and burial of construction, industrial or household waste, which threaten biodiversity, health and ecosystems. The damage from hazardous materials worsens during rainfall, as the pollution seeps into the soil.⁹⁸ In the territory of Sofia, a particularly significant example of serious pollution of agricultural lands is the largest unregulated landfill for construction waste buried with earth masses between Gorublyane and Mladost, where waste is piled up for months on an area not designated as a landfill.⁹⁹

⁹³ Cross.bg, „Диоксини и фурани – опасни замърсители при горенето на отпадъци“ [Dioxins and furans – hazardous pollutants from waste incineration], 10 June 2017.

⁹⁴ World Health Organization, *Dioxins*, 2023.

⁹⁵ Wattbar Industries, *Illegal dumping & hazardous waste effects*, 11 July 2024.

⁹⁶ BNR Burgas, „Незаконно сметище край река Тунджа“ [Illegal landfill near the Tundzha river], 19 November 2025.

⁹⁷ BNT News, „Незаконно сметище за гуми и кабели край река Тунджа“ [Illegal landfill of tires and cables near the Tundzha river], 19 November 2024.

⁹⁸ Vaverková, M.D. et al., *Environmental consequences and the role of illegal waste dumps and their impact on land degradation*, *Land Use Policy* 89, 2019.

⁹⁹ Btvnovinite.bg, „Планина от отпадъци поглъща бъдещия Източен парк: Сметището между „Младост“ и „Горубляне“ продължава да расте“ [A mountain of waste is swallowing the future East Park: The landfill between Mladost and Gorublyane continues to grow], 30 September 2025.

TOWARDS A SUSTAINABLE REDUCTION OF WASTE-RELATED CRIMES

Addressing waste-related crimes is not merely a technical or environmental task; it is a matter of **upholding the rule of law, protecting democratic governance, and defending the public interest.**

Optimising the Legal Framework

One of the main factors behind the increasing number of waste-related crimes is the existing legal framework, which is inadequate to the latest trends in this type of crime and does not provide a sufficient deterrent for offenders. On the one hand, the envisaged administrative sanctions represent just a fraction of the illegal proceeds generated, and on the other, the envisaged criminal sanctions do not cover all forms of waste-related crimes. In this regard, the Bulgarian authorities should take steps to promptly fill the legislative gaps:

- **Urgently and effectively transpose the new Directive (EU) 2024/1203** of the European Parliament and of the Council of 11 April 2024 on environmental crime. The harmonization of Bulgarian legislation in line with the Directive will extend the scope of the Criminal Code with regard to waste-related crimes, and will allow for the prosecution of individuals in management positions in business entities who commit environmental crimes. This will increase personal liability and is expected to have a strong deterrent effect.
- **Amend the Criminal Code** in order to criminalise the dumping and unloading of construction waste or soil outside designated areas.
- **Accelerate the transposition of the latest amendments to the European Directive 2008/98/EC** on waste and, above all, introduce measures for extended producer responsibility for footwear and textile waste and the introduction of a deposit system for packaging waste.
- **Amendment of the Waste Management Act** and municipal regulations, including an increase in administrative sanctions commensurate with the damage caused, especially against systematic offenders.
- **Optimization of the process under the Administrative Offences and Penalties Act (AOPA)**, whereby, for undisputed offences, the Act automatically acquires the force of a Penal Decree if not challenged within the time limit, in order to eliminate the unnecessary administrative burden of issuing a second document and the risk of expiry of the statute of limitations due to bureaucratic delays.

Reforming Law Enforcement

Bulgaria is one of the few countries in the European Union that has established a specialized unit within the General Directorate of the National Police to combat environmental crimes. However, the capacity of this unit remains insufficient given the scale of the problem. The lack of capacity is particularly pronounced at the local level in the country. Law enforcement additionally suffers from the insufficiently well-functioning inter-institutional cooperation between the various responsible institutions in the country. In addition, there remains the need to strengthen international cooperation to counter cross-border waste trafficking, which often uses front companies or complex ownership structures. In this regard, in order to improve law enforcement, it is necessary to:

- **Improve inter-institutional cooperation** between law enforcement agencies in the country, and especially between central and local authorities. This can be achieved by establishing the Joint Unit for Combating Waste Crime, which would include all responsible authorities (the Environment Agency, National Police, Customs, National Revenue Agency).
- **Increase the capacity of law enforcement agencies** at central and local level by increasing the number of employees involved, providing specialised training and technical support.
- **Develop and implement detailed internal methodological guidelines** for investigations of waste-related crimes in the Ministry of Interior and the Bureau of Waste Management, similar to the instructions developed in the UK.
- **Invest in new technological solutions** for early prevention and detection of irregularities.
- **Strengthen cooperation with law enforcement authorities in other EU Member States**, as well as with European institutions such as OLAF, Eurojust and Europol, to counter complex cross-border trafficking schemes and in particular the use of front companies.

Public Awareness

Raising public awareness and making it easier for citizens to report violations is a key factor in combating environmental crime. Increasing **institutional transparency, facilitating access to information and promoting public participation** are the building blocks for a sustainable solution. In this regard, steps are needed to:

- **Establish a publicly accessible and comprehensive system for collecting statistical data on environmental crime** in order to fill the existing information gap and facilitate the work of law enforcement authorities and civil society organisations.
- **The introduction of anonymous reporting hotlines**, similar to the practices of the British Environment Agency and the specialised unit of the French gendarmerie – CESAN. Such an approach could contribute to building a more active and strong civil resistance against illegal practices.

Waste-related crimes have become a significant, yet still insufficiently prioritized, issue in Bulgaria. Addressing them requires a coordinated approach in which legislative reforms, effective law enforcement, and active civic participation function as a unified system. The implementation of these measures in the short and medium term can substantially reduce criminal activity, limit damage, and protect the public interest, public resources, and the environment. Visible institutional accountability, meaningful sanctions, and sustainable prevention mechanisms are key to effectively addressing this problem.

