

2025 FULL REPORTS OF THE MINAMATA CONVENTION ON MERCURY

Report submitted on 30 December 2025



REPORTING PERIOD:

1 January 2021 to 31 December 2024

▼ INFORMATION ON THE PARTY

1. Information on the party

Name of party

Bulgaria

Date on which its instrument of ratification, accession, approval or acceptance was deposited

18 May 2017

Date of entry into force of the Convention for the party

16 August 2017

2. Information on the national focal point

Full name of the institution

Ministry of Environment and water

Title of Contact Officer

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3. Information about the contact officer submitting the reporting format if different from the above

Focal Point is submitting the national report

- ☒ Information is submitted by the national focal point
- ☐ Information is submitted through the national focal point by the contact officer

▼ ART. 3: MERCURY SUPPLY SOURCES AND TRADE

3.1: Does the party have any primary mercury mines that were operating within its territory at the date of entry into force of the Convention for the party?

- ☐ Yes – primary mercury mining with available data
- ☐ Yes – primary mercury mining with no available data
- ☒ No

3.2: Does the party have any primary mercury mines that are now in operation that were not in operation at the time of entry into force of the Convention for the party?

- ☐ Yes – primary mercury mining with available data
- ☐ Yes – primary mercury mining with no available data
- ☒ No

3.3: (A) Has the party endeavoured to identify individual stocks of mercury or mercury compounds exceeding 50 metric tons that are located within its territory?

3.3: (A) Has the party endeavoured to identify individual stocks of mercury or mercury compounds exceeding 50 metric tons that are located within its territory?

- ☐ Yes – with new data* (also to be selected by parties reporting for the first time)
- ☒ Yes – endeavoured and indicates same stocks as reported in the previous report
- ☐ No

3.3: (B) Has the party endeavoured to identify individual sources of mercury–supply–generating stocks exceeding 10 metric tons per year that are located within its territory?

3.3:(B) Has the party endeavoured to identify individual sources of mercury–supply–generating stocks exceeding 10 metric tons per year that are located within its territory?

- ☐ Yes – with new data* (also to be selected by parties reporting for the first time)
- ☒ Yes – endeavoured and indicates same stocks as reported in the previous report
- ☐ No

3.4: Has the party determined that it has excess mercury available from the decommissioning of chlor-alkali facilities?

- ☐ Yes
- ☒ No – has determined it has no excess mercury
- ☐ No – has not made a determination

3.5: *Has the party received consent, or relied on a general notification of consent, in accordance with article 3, including any required certification from importing non-parties, for all exports of mercury from the party's territory in the reporting period?

- ☐ Yes – exports to parties
- ☐ Yes – exports to non-parties
- ☒ No – no export took place
- ☐ No – consent was not given

3.6: Has the party allowed the import of mercury from a non-party?

- ☒ No

- ☐ Yes
- ☐ The importing party has relied on paragraph 7 of article 3

Part E – Additional comments on this article

As reported in previous report, in 2021, a national inventory of mercury, mixtures of mercury and mercury compounds was carried out. According to the results of the inventory there are no identified stocks of mercury or mercury compounds over 50 metric tons in the country and sources of mercury generating stocks over 10 metric tons per year on its territory.

▼ ART. 4: MERCURY-ADDED PRODUCTS

4.1. Has the party taken any appropriate measures to not allow the manufacture, import or export of mercury-added products listed in Part I of Annex A of the Convention after the phase-out date specified for those products?

- ☒ Yes
- ☐ No
- ☐ Yes (implementing paragraph 2 of article 4)

If yes, please provide information on the measures.

According to the national legislation (Act on the protection from the harmful impact of chemical substances and mixtures (Chapters seven and eight) – <https://www.moew.government.bg/en/act-on-the-protection-from-the-harmful-impact-of-chemical-substances-and-mixtures/>), which introduces the European Regulation 2017/852 on mercury, Bulgaria has introduced appropriate measures to not allow the manufacture, import or export of mercury-added products listed in Part I of Annex A of the Convention after the phase-out date specified for those products

If yes, has the party registered for an exemption pursuant to article 6?

- ☐ Yes
- ☒ No

4.3: (A) Has the party taken two or more measures listed in subparagraphs (i) to (ix) of part II of annex A for the mercury-added products listed in part II of annex A in accordance with the provisions set out therein?

4.3:(A) Has the party taken two or more measures listed in subparagraphs (i) to (ix) of part II of annex A for the mercury-added products listed in part II of annex A in accordance with the provisions set out therein?

- ☒ Yes
- ☐ No

If yes, please provide information on the measures.

Ministry of health

4.3: (B) If the amendment to annex A adopted in decision MC-4/3 has entered into force for the party, has the party (please check the appropriate box below) taken relevant measures:

4.3:(B) If the amendment to annex A adopted in decision MC-4/3 has entered into force for the party, has the party (please check the appropriate box below) taken relevant measures:

- ☒ Yes
- ☐ No
- ☐ Not applicable

If the party answered yes please select from the bellow checkboxes

- ☒ Excluded or not allowed, by taking measures as appropriate, the use of mercury in bulk form by dental practitioners
- ☒ Excluded or not allowed, by taking measures as appropriate, or recommended against, the use of dental amalgam for the dental treatment of deciduous teeth of patients under 15 years of age and of pregnant and breastfeeding women, except when such use is considered necessary by the dental practitioner based on the needs of the patient

If the party answered yes to either option above, please provide information on the measures.
Ministry of health

4.4: Has the party taken measures to prevent the incorporation into assembled products of mercury-added products whose manufacture, import and export are not allowed for it under article 4?

- ☐ Yes
- ☐ No
- ☒ No – not applicable (do not have facilities assembling products using mercury-added products)

4.5: Has the party discouraged the manufacture and the distribution in commerce of mercury-added products not covered by any known use in accordance with article 4, paragraph 6?

- ☒ Yes
- ☐ No – no action taken
- ☐ No – an assessment of the risks and benefits of the product demonstrates benefits to human health or the environment

If yes, please provide information on the measures.

According to the national legislation (Act on the protection from the harmful impact of chemical substances and mixtures – <https://www.moew.government.bg/en/act-on-the-protection-from-the-harmful-impact-of-chemical-substances-and-mixtures/>), Bulgaria has introduced appropriate measures to discourage the production and distribution in the market of products with added mercury which are not covered by any use in accordance with Article 4 (6). The measures include the introduction of a procedure for authorization of production (According to Regulation 2017/852), setting criteria and requirements for assessing the risks and benefits of the product for the environment or human health. The country carries out administrative and regulatory control over the production and import of mercury-added products.

The applicable articles are 7, 7a, 7b (national procedure) and art. 25 para. 1, point 30 (control) of the national Act. (for more information, please refer to Act (new SG 53/18, in force from 26.06.2018) <https://www.moew.government.bg/en/act-on-the-protection-from-the-harmful-impact-of-chemical-substances-and-mixtures/>).

Part E – Additional comments on this article

With regard to restrictions on the use and placing on the EU market of mercury added products, restrictions on the use of mercury in measuring instruments have been introduced – in Annex XVII of Regulation (EC) № 1907/2006 (REACH), as amended by Regulation EC) № 552/2009 of the Commission.

The following additional legislative acts are also applicable in the country – Regulation (EC) № 1223/2009 on cosmetic products, Directive 2006/66 / EC on batteries and accumulators and waste batteries and accumulators, Directive 2011/65 / EU on restrictions on the use of certain hazardous substances in electrical and electronic equipment. Regulation (EC) No 396/2005 on maximum residue limits of pesticides in and on food or feed of plant or animal origin, and amending Council Directive 91/414 / EEC, is applicable to the establishment of maximum levels of mercury

5.1: Are there facilities within the territory of the party that use mercury or mercury compounds for the processes listed in Annex B of the Minamata Convention in accordance with paragraph 5 of article 5 of the Convention?

- ☐ Yes
- ☒ No
- ☐ Do not know

5.2: Are measures in place to not allow the use of mercury or mercury compounds in manufacturing processes listed in Part I of Annex B after the phase-out date specified in that Annex for the individual process?

CHLOR-ALKALI PRODUCTION

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

ACETALDEHYDE PRODUCTION IN WHICH MERCURY OR MERCURY COMPOUNDS ARE USED AS A CATALYST

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

5.3: Are measures in place to restrict the use of mercury or mercury compounds in the processes listed in Part II of Annex B in accordance with the provisions set out therein?

VINYL CHLORIDE MONOMER PRODUCTION

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

SODIUM OR POTASSIUM METHYLATE OR ETHYLATE

- ☐ Yes
- ☐ No
- ☒ Not applicable (do not have these facilities)

PRODUCTION OF POLYURETHANE USING MERCURY-CONTAINING CATALYSTS

- ☐ Yes
- ☐ No

☒ Not applicable (do not have these facilities)

5.4: Is there any use of mercury or mercury compounds in a facility using the manufacturing processes listed in Annex B that did not exist prior to the date of entry into force of the Convention for the party?

☐ Yes

☒ No

5.5: Has the party discouraged the development of any facility using any other manufacturing process in which mercury or mercury compounds are intentionally used that did not exist prior to the date of entry into force of the Convention?

☐ Yes

☒ No – no action taken

☐ No – the party demonstrated to the Conference of the Parties the significant environmental and health benefits of the manufacturing process and that there are no technically and economically feasible mercury-free alternatives available providing such benefits.

Part E – Additional comments on this article

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▼ ART. 7: ARTISANAL AND SMALL-SCALE GOLD MINING

7.1: Have steps been taken to reduce, and where feasible eliminate, the use of mercury and mercury compounds in, and the emissions and releases to the environment of mercury from, artisanal and small-scale gold mining and processing subject to article 7 within your territory?

☐ Yes

☐ No

☒ There is no artisanal and small-scale gold mining and processing subject to article 7 in which mercury amalgamation is used in the territory

7.2: Has the party determined, and notified the secretariat, that artisanal and small-scale gold mining and processing within its territory is more than insignificant?

☐ Yes

☒ No

7.5: Supplemental: Has the party cooperated with other countries or relevant intergovernmental organizations or other entities to achieve the objective of this article?

☐ Yes

☒ No

Please provide information

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Part E – Additional comments on this article

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▼ ART. 8: EMISSIONS

8.1: Identify any Annex D source categories for which there are new sources of emissions of mercury or mercury compounds as defined in paragraph 2 (c) of article 8.

For each of those source categories describe the measures in place, including the effectiveness of such measures, to implement the requirements of paragraph 4 of article 8.

- ☐ Coal-fired power plants
- ☐ Coal-fired industrial boilers
- ☐ Smelting and roasting processes used in the production of non-ferrous metals
- ☐ Waste incineration facilities
- ☐ Cement clinker production facilities

Has the party required the use of best available techniques or best environmental practices (BAT/BEP) to control and where feasible reduce emissions for new sources no later than 5 years after the date of entry into force of the Convention for the party?

- ☐ Yes
- ☒ No (please explain)

No (please explain)

Bulgaria has no new sources in any of the categories listed in Annex D

The following measures are generally applied to installations with integrated permit issued:

- (a) a quantified control objective and, where feasible, a reduction in emissions from the sources concerned;
- (b) emission limit values or control and, where practicable, emission reductions from relevant sources;
- (c) use of best available techniques and best environmental practices to control emissions from relevant sources.

8.2: Identify any Annex D source categories for which there are existing sources of emissions of mercury or mercury compounds as defined in paragraph 2 (e) of article 8.

For each of those source categories, select and provide details on the measures implemented under paragraph 5 of article 8 and explain the progress that these applied measures have achieved in reducing emissions over time in your territory:

▼ COAL-FIRED POWER PLANTS

- ☐ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

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Progress

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▼ COAL-FIRED INDUSTRIAL BOILERS

- ☐ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

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Progress

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▼ SMELTING AND ROASTING PROCESSES USED IN THE PRODUCTION OF NON-FERROUS METALS

- ☐ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

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Progress

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▼ WASTE INCINERATION FACILITIES

- ☐ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

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Progress

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▼ CEMENT CLINKER PRODUCTION FACILITIES

- ☐ A quantified goal for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Emission limit values for controlling and, where feasible, reducing emissions from relevant sources
- ☐ Use of BAT/BEP to control emissions from relevant sources
- ☐ Multi-pollutant control strategy that would deliver co-benefits for control of mercury emissions
- ☐ Alternative measures to reduce emissions from relevant sources

Measures

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Progress

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Have the measures for existing sources under paragraph 5 of article 8 been implemented no later than 10 years after the date of entry into force of the Convention for the party?

- ☐ Yes
- ☒ No

Please explain

Bulgaria has no existing sources.

8.3: Has the party prepared an inventory of emissions from relevant sources within 5 years of entry into force of the Convention for it?

- ☐ Yes
- ☒ No
- ☐ Have not been a party for 5 years

If no such inventory exists, please explain

The criteria for identifying sources within the categories described in Annex D to the Convention are in accordance with Annex №4 of the Environmental Protection Act (EPA) and within the scope of Annex №1 of Regulation (EC) № 166/2006 of the Convention. Of the European Parliament and of the Council of 18 January 2006 establishing a European Pollutant Release and Transfer Register and amending Council Directives 91/689 / EEC and 96/61 / EC (Regulation 166/2006).

Thus, although the country has not chosen to establish criteria for identifying the relevant sources, under Art. 8 (2) (b), the objectives of the Convention for the identification of relevant sources may be considered to be achieved.

Operators of installations / facilities covered by Annex №4 of the Environmental Protection Act (EPA), including this type of installation under Annex D of the Minamata Convention, must apply the best available techniques (BAT) applicable to the relevant activity. Decisions of the European Commission to draw conclusions on best available techniques (BAT decisions), in accordance with Article 13 (5) of Directive 2010/75 / EU on industrial emissions (amended by Directive (EU) 2024/1785) , are also taken into account in integrated permitting procedures for installations under Chapter Two of the Directive, respectively Annex №4 of the EPA.

Integrated permits set conditions that require not to exceed the established emission limit values of relevant pollutants, including mercury – the applicable air legislation and BAT Decisions, set conditions not to violate air quality. Conditions are set which regulate the performance of the respective monitoring.

In this regard, it can be summarized that the following measures are generally applied to

installations with a integrated permit:

- (a) a quantified control objective and, where feasible, a reduction in emissions from the sources concerned;
- (b) emission limit values for control and, where practicable, emission reductions from relevant sources;
- (c) use of best available techniques and best environmental practices to control emissions from relevant sources.

For all manufacturing and industrial plants (incl. for smelting and roasting processes used in the production of non-ferrous metals and for cement clinker production facilities), except those for incineration and co-incineration of waste, ELVs for mercury are set in Ordinance № 1 of 27.06.2005 for emission limit values of harmful substances (pollutants) emissions in the atmosphere of objects and activities with stationary sources of emissions (effective from 6.08.2006), as follows:

Substance: Mercury and its compounds, identified as Hg

ELV as total mass flow for the stationary source – 0,25 g/h

ELV as concentration level – 0,05 mg/Nm³

These ELVs are reflected in the emission factors used to determine annual emissions of that pollutant.

For more information, please see the register: http://pdbase.government.bg/forms/public_eprtr.jsp

Applicable European legislation:

– Directive 2010/75 / EU, amended by Directive (EU) 2024/1785 on industrial emissions (integrated pollution prevention and control) is a key legal instrument for reducing mercury emissions. The application of best available techniques is expected to lead to an accelerated replacement of mercury-based technologies and to a reduction in mercury emissions in many industrial sectors, in particular cement, non-ferrous metallurgy, large combustion plants and waste incineration. The aim is to control, reduce and, where appropriate mercury-free alternatives exist, eliminate point sources and diffuse emissions of mercury and mercury compounds. Directive 2010/75 / EU stipulates that for large combustion plants using coal, including lignite, total mercury emissions are measured at least once a year.

The emission limit values for waste water discharges from waste gas treatment set out in Annex 6 to the Directive set a level of 0.03 mg / l for mercury.

– The Directive 2016/2284 / EU to reduce national emissions of certain air pollutants. Mercury emissions to air under the Convention on Long-range Transboundary Air Pollution are reported under this Directive.

– Regulation № 166/2006 establishing a European Pollutant Release and Transfer Register (EERP), adopted on 18 January 2006, requires operators carrying out activities falling within the scope of Annex I thereto to report annual releases and transfers of pollutants to the European Commission (EC).

Key national legislation for the management of mercury, mercury compounds and mercury mixtures, and mercury waste:

– The Act on the protection from the harmful impact of chemical substances and mixtures of 2018 reflects the provisions of Regulation (EU) 2017/852 on mercury in the Republic of Bulgaria and the measures provided for in the Minamata Convention on Mercury. The measures of the Minamata Convention have been implemented in the existing European and national legislation on mercury, and the general objectives are in line with the EU and Community Strategy Concerning Mercury. Many opportunities to reduce mercury use have already been realized in the EU.

National legislation on emissions:

– Clean Air Act:

– Ordinance № 1 of 27.06.2005 on norms for permissible emissions of harmful substances (pollutants) released into the atmosphere from sites and activities with stationary emission sources introduces in Annex 1 a norm for permissible emissions of mercury – 0.05 mg / m³.

– Ordinance № 4 of 5 April 2013 on the conditions and requirements for the construction and operation of incineration plants and waste co-incineration plants specifies the mercury emission limit of 0.05 mg / m³.

– Ordinance on the procedure and manner of organizing the national inventories of emissions of harmful substances and greenhouse gases into the atmosphere is related to the reporting of emissions of harmful substances into the atmosphere.

8.4: Has the party chosen to establish criteria to identify relevant sources covered within a source category?

☐ Yes

☒ No

8.5: Has the party chosen to prepare a national plan setting out the measures to be taken to control emissions from relevant sources and its expected targets, goals and outcomes?

☐ Yes

☒ No

Part E – Additional comments on this article

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▼ ART. 9: RELEASES

9.1: Are there, within the party's territory, relevant sources of releases as defined in paragraph 2 (b) of article 9?

☐ Yes

☒ No

☐ Do not know (please explain)

9.2: Has the party established an inventory of releases from relevant sources within 5 years of entry into force of the convention for it?

☐ Yes

☒ Relevant sources do not exist in the territory

☐ Have not been a party for 5 years

☐ No (please explain)

Part E – Additional comments on this article

The party has information on sources of releases, which falls within the scope of Annex № 4 of the Environmental Protection Act (EPA) and the scope of Annex № 1 of Regulation (EC) № 166/2006 of the European Parliament and of the Council of 18 January 2006 establishing the European Pollutant Release and Transfer Register and amending Council Directives 91/689 / EEC and 96/61 / EC (Regulation 166/2006).

Regulation № 166/2006 establishing a European Pollutant Release and Transfer Register (EERP), adopted on 18 January 2006, requires operators carrying out activities falling within the scope of Annex I thereto to report annual releases and transfers of pollutants to the European Commission (EC).

For more information, please refer to register: http://pdbase.government.bg/forms/public_eptr.jsp

Thus, although the country has not identified the relevant sources, under Art. 9 (2) (b), the objectives of the Convention may be considered to be achieved.

Under the conditions set out in complex permits (CoP) individual emission restrictions are set for the wastewater flows from the site (for which the respective CoP is issued) according to the applicable legislation in the field of water, the applicable limit values according to the BAT Decisions.

Conditions are set for reducing / phasing out the release of priority hazardous substances, including mercury and its compounds, in accordance with the Ordinance on Environmental Quality for priority substances and certain other pollutants. Conditions are set which regulate the performance of the respective monitoring.

The measures taken to deal with releases from Annex D installations that have issued complex permits are the following:

(a) control of emission limit values and, where practicable, reduction of emissions from relevant sources;

(b) use of best available techniques and best environmental practices to control releases from

relevant sources.

(c) alternative measures to reduce emissions from relevant sources

▼ ART. 10: ENVIRONMENTALLY SOUND INTERIM STORAGE OF MERCURY, OTHER THAN WASTE MERCURY

10.1: Has the party taken measures to ensure that the interim storage of non-waste mercury and mercury compounds intended for a use allowed to a party under the Convention is undertaken in an environmentally sound manner?

☒ Yes

☐ No (please explain)

☐ Do not know (please explain)

If yes, please indicate the measures taken to ensure that such interim storage is undertaken in an environmentally sound manner, and the effectiveness of those measures.

Guidelines for the environmentally sound interim storage of mercury, other than mercury waste, adopted by the Conference of the Parties at its second meeting has been introduced into national legislation by the Ordinance on the Procedure for the Storage of Hazardous Chemicals and Mixtures – Adopted by the Council of Ministers № 152 of 30.05.2011 (SG. 43 of June 7 2011, amended and ext. SG. 10 of 5 February 2021).

Annex № 2 to Art. 6, item 11 (New, SG No. 10/2021, effective 5.02.2021) to the Ordinance:

"Requirements for the environmentally sound interim storage of mercury, mercury mixtures and or mercury compounds other than mercury-containing wastes"

For more information, please refer to the link: <https://www.moew.government.bg/en/ordinance-on-the-order-and-manner-of-storage-of-hazardous-substances-and-mixtures/>

There are no identified uses in the country of mercury or mercury compounds as defined in Article 3 of the Convention. No stockpiles of mercury and mercury compounds have been identified in this regard

Part E – Additional comments on this article

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▼ ART. 11: MERCURY WASTES

11.1: Have measures outlined in article 11, paragraph 3, been implemented for the party's mercury waste?

☒ Yes

☐ No

☒ Yes – the party has taken measures so that mercury waste is managed in an environmentally sound manner

Please describe measure and effectiveness of measures

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☐ Yes – the party has taken measures so that mercury waste is recovered, recycled, reclaimed or directly re-used for a use allowed to a party under the Convention or for environmentally sound disposal pursuant to paragraph 3 (a)

☐ Yes – the party has taken measures so that mercury waste is not transported across international boundaries except for the purpose of environmentally sound disposal

If the party answered yes to any measures above, please describe the measures implemented pursuant to paragraph 3, and please also describe the effectiveness of those measures.

In the Republic of Bulgaria, mercury waste and waste from mercury-containing products are managed as hazardous waste. The requirements are in accordance with Article 11, paragraph 3 of the Minamata Convention and in accordance with the requirements of Regulation (EU) 2017/852 on mercury. Specific measures are set out in the Ordinance on Waste Electrical and Electronic Equipment, the Ordinance on Batteries and Accumulators and on Unusable Batteries and Accumulators, and in Ordinance No. 6/2013 on the conditions and requirements for the construction and operation of landfills and other facilities and installations for the recovery and disposal of waste, which sets requirements for the storage of metallic mercury for more than one year.

11.2: *Are there facilities for final disposal of waste consisting of mercury or mercury compounds in the party's territory?

- ☐ Yes
- ☒ No
- ☐ Do not know (please explain)

Part E – Additional comments on this article

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▼ ART. 12: CONTAMINATED SITES

12.1: Has the party endeavoured to develop strategies for identifying and assessing sites contaminated by mercury or mercury compounds in its territory?

- ☒ Yes
- ☐ No

Please elaborate

The country has been implementing a soil monitoring program since 2004. The results of the monitoring show that no soils contaminated by mercury or mercury compounds have been identified.

Part E – Additional comments on this article

Monitoring of land and soils: Since 2004, a soil monitoring program was developed and approved by the Minister of Environment and Water, Bulgaria, which is organised on three levels. The monitoring program is fully in line with the latest EC and EEA requirements, good practices in a number of European countries, as well as national legislation adopted in 2007–2009.

National legislation regarding releases of mercury and mercury compounds into soils:

- Soil Act – this act shall provide for the public relations, connected to protection of soils and their functions, as well as their sustainable use and permanent recreation as a component of the environment. (SG No. 89 of November 6, 2007, last amended and supplemented SG No. 98 of November 27, 2018) <https://www.fao.org/faolex/results/details/en/c/LEX-FAOC116552>
- Ordinance № 4 of 12 January 2009 on soil monitoring – this ordinance regulates the order for soil monitoring through the establishment of a National Soil Monitoring System.
- Ordinance № 3 on Norms on the permissible content of harmful substances in soils (SG No. 71 of 12 August 2008). The Ordinance lays down the standards for permissible soil content and soil sampling requirements for the determination of harmful substances. Art. 1 of the Ordinance determine: the limit values for admissible content of harmful substances in the soils and the requirements for taking and testing of soil samples for determination of the content of harmful substances. According to Art. 2. the limit values for permissible content of harmful substances in the soils are determined on the basis of an assessment of the risk for the environment and human health in three levels:
 1. precautionary concentrations (PC);
 2. maximum permissible concentrations (MPC);
 3. intervention concentrations (IR).
- Ordinance on inventory and surveys of soiled areas, necessary recovery measures, as well as

maintenance of the implemented restoration activities (SG 15 of 16 February 2007). The Ordinance determines the order and manner of conducting the inventory and surveys of areas with contaminated soil, the necessary recovery measures, as well as the maintenance of the implemented recovery activities.

The monitoring programme is organised on 3 levels as follows:

- Level I observations (wide-scale monitoring) are carried out in a uniform network of 16x16 km, at 397 points and provide data for the assessment of soil condition according to the following indicators: 9 heavy metals (inc. Hg). The periodicity of observation – 5 years.
- Level II observations are oriented towards regional manifestations of degradation processes – acidification and salinisation. Processes of erosion – water and wind are observed through specially developed mathematical models for evaluation and forecast. Soil sealing shall be assessed on the basis of statistics and land cover mapping.
- Level III observations shall be identified by so-called local soil pollution within which an inventory of contaminated soil areas should be carried out. The inventory is still partial and irregular, based on available data. In 2007, a specialised ordinance to the EPA was established and the methodology for inventory is to be established.

– Order №564 / 13.10.2016 of the Minister of Environment and Water. This order approves the Methodology for preliminary and detailed studies and the creation of a public register for inventory of areas with contaminated soil.

– Order № 704 / 20.09.2019 of the Minister of Environment and Water. This order approves the schemes for monitoring the soils and the indicators for assessment of the condition of the soils according to art. 10, para. 1 and Art. 11, para. 1 of the Ordinance on soil monitoring. The indicators have been developed and are used to assess the condition of soils at national and regional level. Assessment of soil condition at the regional level is carried out by the Regional Inspectorates of Environment and Water (RIEW), and at the national level – by the Executive Environment Agency (EEA).

The frequency of observations varies depending on the processes. Soil testing shall be carried out in 15 EEA Regional accredited Laboratories.

Public application for soils — <https://ecosys.eea.government.bg/SoilMonPublic/>

Application with registered soil access — <https://ecosys.eea.government.bg/SoilMonitoring>

▼ ART. 13: FINANCIAL RESOURCES AND MECHANISM

13.1: Has the party undertaken to provide, within its capabilities, resources in respect of those national activities that are intended to implement the Convention in accordance with its national policies, priorities, plans and programmes?

☒ Yes

☐ No

Please specify

Resources for implementing the Convention include national funding for applicable policies, incl. control as part of national budget.

13.2: Supplemental: Has the party, within its capabilities, contributed to the mechanism referred to in paragraph 5 of article 13?

☐ Yes

☒ No

Please provide comments, if any.

The only payment that were made by Bulgaria is in the scope of the annual Government's contributions to the Minamata Convention General Trust Fund, determined by the COP.

13.3: Supplemental: Has the party provided financial resources to assist developing-country parties and/or parties with economies in transition in the implementation of the Convention through other bilateral,

regional and multilateral sources or channels?

☐ Yes

☒ No

Please specify

{Empty}

Please provide comments, if any.

The only payment that were made by Bulgaria is in the scope of the annual Government's contributions to the Minamata Convention General Trust Fund, determined by the COP.

Part E – Additional comments on this article

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▼ ART. 14: CAPACITY-BUILDING, TECHNICAL ASSISTANCE AND TECHNOLOGY TRANSFER

14.1: Has the party cooperated to provide capacity-building or technical assistance, pursuant to article 14, to another party to the Convention?

☐ Yes

☒ No

Please specify

Due to financial constraints, the country is not in a position to provide resources to assist developing countries and/or countries with economies in transition in implementing the Convention. Bulgaria has not provided technical or capacity building assistance, as we have no information that another Party to the Convention has requested assistance. It is difficult to answer whether the country intends to do so in the future, as the competent authority has limited financial resources.

14.2: Supplemental: Has the party received capacity-building or technical assistance pursuant to article 14?

☐ Yes

☒ No

Please specify

{Empty}

Please provide comments, if any.

{Empty}

14.3: Has the party promoted and facilitated the development, transfer and diffusion of and access to, up-to-date environmentally sound alternative technologies?

☐ Yes

☒ No

☐ Other

Please specify

See reply to question 14.1 above, it is also valid for 14.3.

Part E – Additional comments on this article

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▼ ART. 16: HEALTH ASPECTS

16.1: Have measures been taken to provide information to the public on exposure to mercury in accordance with paragraph 1 of article 16?

☒ Yes

☐ No

Supplemental: If yes, describe the measures that have been taken.

Ministry of health

16.2: Have any measures been taken to protect human health in accordance with article 16 beyond the provision of information to the public on exposure to mercury (referred to in question 16.1)?

☒ Yes

☐ No

Supplemental: If yes, describe the measures that have been taken.

{Empty}

Part E – Additional comments on this article

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▼ ART. 17: INFORMATION EXCHANGE

17.1: Has the party facilitated the exchange of information referred to in article 17, paragraph 1?

☒ Yes

☐ No

If yes, the Party may wish to indicate in the space provided below the exchange of information it has facilitated, such as:

☐ Scientific, technical, economic and legal information concerning mercury and mercury compounds, including toxicological, ecotoxicological and safety information

☐ Information on the reduction or elimination of the production, use, trade, emissions and releases of mercury and mercury compounds

☐ Information on technically and economically viable alternatives to:

☐ Epidemiological information concerning health impacts associated with exposure to mercury and mercury compounds, in close cooperation with the World Health Organization and other relevant organizations, as appropriate. (Art. 17.1 (a)–(d))

Part E – Additional comments on this article

Through its membership in the European Regional Organization of the World Dental Organization (ERO FDI), the Council of European Dentists (CED) and the World Dental Federation (FDI), the Bulgarian Dental Union constantly exchanges information – technical, economic and legal on dental amalgam and its safety in use

▼ ART. 18: PUBLIC INFORMATION, AWARENESS AND EDUCATION

18.1: Have measures been taken to promote and facilitate the provision to the public of the kinds of information listed in article 18, paragraph 1?

☒ Yes

☐ No

If yes, the party may wish to indicate in the space provided below, the measures it has taken to promote and facilitate information to the public, such as:

(a) Provision to the public of available information on:

- ☐ The effects of mercury and mercury compounds on human health and the environment
- ☐ Alternatives to mercury and mercury compounds
- ☐ The topics identified in paragraph 1 of article 17
- ☒ The results of its research, development and monitoring activities under article 19

The results of its research, development and monitoring activities under article 19

According to the Environmental Protection Act, the Minister of Environment and Water maintains a public register with data on the results of the issuance, refusal, revocation, review, amendment and updating of Integrated permits.

Link: <http://registers.moew.government.bg/kr/>

The Executive Environment Agency maintains a public register on its website of the results of the monitoring of emissions provided for in the integrated permits.

Link: <http://eea.government.bg/bg/r-r-r-kpkz/godishni-dokladi-14/index>

Regulation № 166/2006 establishing a European Pollutant Release and Transfer Register (EPRTTR), adopted on 18 January 2006, requires operators carrying out activities falling within the scope of Annex I thereto to report annual releases and emissions of pollutants to the European Commission. Mercury and its compounds (expressed as Hg) are included in the list of pollutants reported under the EPRTTR.

The Executive Environmental Agency (EEA) summarizes data from the EPRTTR and maintains a public register of releases and transfers of pollutants at national level, as well as access to it through the EEA website.

Link: http://pdbase.government.bg/forms/public_eprtr.jsp

- ☐ Activities to meet its obligations under the Convention

(b) Education, training and public awareness related to the effects of exposure to mercury and mercury compounds on human health and the environment in collaboration with relevant intergovernmental and non-governmental organizations and vulnerable populations, as appropriate.

Activities to meet its obligations under the Convention

Education, training and public awareness activities related to the effects of exposure to mercury and mercury compounds on human health and the environment are diverse, often in cooperation with governmental and non-governmental organizations. The National Center for Public Health and Analysis (NCPHA) is the active institution in this field of activity. Specifically with regard to mercury, consistent practice after 2017 is the inclusion in the courses for continuing education and acquisition of a specialty on the topic of mercury toxicity and the Minamata Convention. The Convention itself was ratified by a law adopted by the 43rd National Assembly on September 2, 2016 – SG. no. 71 of 2016 in force for the Republic of Bulgaria from August 16, 2017 and is publicly available.

The National Center for Public Health and Analysis (NCPHA) constantly exchanges information and maintains its awareness through WHO scientific information materials on exposure, health risk assessment, health and epidemiological aspects related to mercury. Separately, in connection with the preparation of the National Plan for measures for gradual phase down of the use of dental amalgam in the Republic of Bulgaria, NCPHA initiated an expert discussion in the period 2019–2020 and held consultations with international experts on the problem – Elena Lymberidi-SeUimo ("Zero Mercury Campaign", European Environmental Bureau), Linn Norrback (Swedish Chemicals Agency), Florian Schulze (IG Umwelt Zahnmedizin) and others.

On the other hand, the National System for the Separate Collection of Hazardous Household Waste enables households to separate and transfer mercury and devices containing mercury, such as thermometers, blood pressure monitors and mercury ampoules, to mobile points. These are the most recognizable hazardous waste in the home.. During the campaigns, leaflets are distributed by the mobile points describing which waste should not be disposed of in shared containers, promoting the signs on the packaging that indicate a risk to health and the environment.

Part E – Additional comments on this article

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▼ ART. 19: RESEARCH, DEVELOPMENT AND MONITORING

19.1: Has the party undertaken any research, development and monitoring in accordance with paragraph 1 of article 19?

☒ Yes

☐ No

If yes, the party may wish to indicate in the space provided below, the research, development and monitoring it has undertaken, such as:

- ☐ Inventories of use, consumption, anthropogenic emissions to air and releases to water and land of mercury and mercury compounds
- ☐ Modelling and geographically representative monitoring of levels of mercury and mercury compounds in vulnerable populations and in environmental media, including biotic media such as fish, marine mammals, sea turtles and birds, as well as collaboration in the collection and exchange of relevant and appropriate samples
- ☒ Assessments of the impact of mercury and mercury compounds on human health and the environment, in addition to social, economic and cultural impacts, particularly in respect of vulnerable populations

Assessments of the impact of mercury and mercury compounds on human health and the environment, in addition to social, economic and cultural impacts, particularly in respect of vulnerable populations

Given the lack of information on the use of mercury amalgam-containing materials in the dental treatment of children and adults for the Republic of Bulgaria, an amendment to Annex 1 to Form 365 ‘Activity of dental practitioners’ was proposed and implemented by the National Centre for Public Health and Analysis in 2021. The form is included in the overall package of medical and statistical documentation approved by the Ministry of Health. The new format of the table under point 1 ‘Therapeutic activity’, as of 2022, differentiates the type of obturation material used – with amalgam or other material, common to all age groups, vulnerable groups up to 17 years (permanent and temporary teeth) and pregnant and lactating women. Given the need to separate the therapeutic activities of Annex 1 into ‘Everything’ and ‘Until 17’ groups, the vulnerable age group ‘below 15’ of Regulation (EU) 2017/852 on mercury had to be associated in the new Annex 1 with the group ‘Until 17’.

Currently, information on professional use of dental amalgam in 2022, 2023 and 2024 is available, which is presented in Tables 1, 2 and 3. Data are at national level, aggregated for all dental care institutions:

- individual primary dental care (IPD) practices;
- group practices for primary dental care (GPPD);
- Individual Specialised Dental Assistance (ISDA) practices;
- group practices for specialised dental care (GPSD);
- dental centres (DCs).

The total relative share of the above-mentioned dental care establishments that reported their activities to all registered ones in 2022 was 60.8%. 62.7% of registered dental care establishments submitted reports in 2023 year and 61.1% in 2024.

The data presented indicate a significant decrease in the use of dental amalgam in 2023 and 2024 compared to previous data for 2022, which is favourable statistics in the context of an approximately unchanged total number of healed teeth in each of the three years.

Table 1.
2022

All of them of which children up to 17 years old Pregnant and lactating women
permanent teeth Temporary teeth
Healed teeth – total 3 042 203 579 338 371 714 19 609

of which: Healed with
dental amalgam 264 074 115 024 49 471 265
Healed with
other material 2 778 129 464 314 322 243 19 344

Table 2.

2023

All of them of which children up to 17 years old Pregnant and lactating women

permanent teeth Temporary teeth

Healed teeth – total 3 005 248 537 907 353 708 9 353

of which: Healed with

dental amalgam 45 075 7 140 3 433 73

Healed with

other material 2 960 173 530 767 350 275 9 280

Table 3.

2024

All of them of which children up to 17 years old Pregnant and lactating women

permanent teeth Temporary teeth

Healed teeth – total 2 993 155 574 496 354 528 7 504

of which: Healed with

dental amalgam 30 362 8 419 3 527 127

Healed with

other material 2 962 793 566 077 351 001 7 377

☐ Harmonized methodologies for the activities undertaken under subparagraphs (a), (b) and (c) of paragraph 1 of article 19

☐ Information on the environmental cycle, transport (including long-range transport and deposition), transformation and fate of mercury and mercury compounds in a range of ecosystems, taking appropriate account of the distinction between anthropogenic and natural emissions and releases of mercury and of remobilization of mercury from historic deposition

☐ Information on commerce and trade in mercury and mercury compounds and mercury-added products

☐ Information and research on the technical and economic availability of mercury-free products and processes and on best available techniques and best environmental practices to reduce and monitor emissions and releases of mercury and mercury compounds

(Art. 19 (1) (a)–(g))

Part E – Additional comments on this article

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Part C: Comments regarding possible challenges in meeting the objectives of the Convention

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▼ COMMENTS REGARDING THE REPORTING FORMAT AND POSSIBLE IMPROVEMENTS, IF ANY

Comments regarding the reporting format and possible improvements, if any

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