



NATIONS UNIES

COMMISSION ÉCONOMIQUE
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Ref: Pre-admissibility

ОБЪЕДИНЕННЫЕ НАЦИИ

ЕВРОПЕЙСКАЯ ЭКОНОМИЧЕСКАЯ
КОМИССИЯ

UNITED NATIONS

ECONOMIC COMMISSION
FOR EUROPE

Palais des Nations, Room 429-2
CH-1211 GENEVA 10

4 September 2014

Dimitur Vulev Dimitrov
NGO "DEN", UIN 176232504
str. Jordan Jovkov 23, office 3
Jambol 8600
Bulgaria

Dear Mr. Dimitrov,

Re: Communication to the Aarhus Convention Compliance Committee concerning compliance by Bulgaria in connection with the Waste Management Act

At its forty-fifth meeting (Maastricht, 29 June – 2 July 2014), the Aarhus Convention Compliance Committee considered the preliminary admissibility of the communication submitted by you on 27 January 2014 on behalf of NGO "DEN". The communication alleged non-compliance with various provisions of the Aarhus Convention in connection with the Waste Management Act. The Compliance Committee decided to defer its preliminary determination of admissibility in order to seek further clarification from the communicant.

The Committee invites you to re-submit your communication after revising it in the following respects:

1. For each provision of the Convention you allege to be breached, please carefully apply the relevant facts from your case to the specific wording of that provision to show clearly how the provision has been breached in your case. Please repeat this exercise for each of the provisions you allege to have been breached.
2. When carrying out the above exercise with respect to your allegations under article 6, please explain which decisions of the Bulgarian authorities fall within the scope of either annex I or article 6, paragraph 1(b) of the Convention, and why. Please provide any relevant documentation (together with high-quality English translations thereof) to support your answer.
3. With respect to your allegations under article 9, please explain for which decisions/acts you consider that the lack of a right for NGOs to challenge those decisions/acts amounts to a breach of article 9, paragraph 2. Also, please explain for which decisions/acts you consider the lack of right for NGOs to challenge amounts to a breach of article 9, paragraph 3 of the Convention.
4. Please provide a high quality, legal-standard English translation of the communication, as

parts of it are currently very difficult to understand.

We would be grateful to receive the re-submitted communication by **Tuesday, 23 September 2014** in order that it may be considered by the Committee during its forty-sixth meeting (Geneva, 22-25 September 2014).

If the above timeframe will not be possible for you, or if you have any other questions, please do not hesitate to contact the secretariat.

Yours sincerely,



Fiona Marshall
Secretary to the Aarhus Convention Compliance Committee