

Toxics-Free SDGs (TFSDGs) Projects Phase 3: The Toxic Plastic Waste Trade

1. Introduction

Bulgaria is set to transpose the [EU directive on single-use plastic](#) (SUP) items as of July 2021 ([Directive \(EU\) 2019/904](#)) and will ban only 8 products of single-use plastics, as listed in the Directive. The Directive calls on each country to apply additional measures to reduce single-use plastic products; however, this is left up to the country when implementing the EU law. In line with this recommendation, we, as NGOs, believe that Bulgaria should implement more ambitious measures. [A petition demanding ban on single-use plastics launched jointly between Za Zemiata and Greenpeace Bulgaria](#) gathered close to 20,000 signatures by citizens and was officially sent to the Ministry of Environment and Waters in October 2020. As of today, in July 2021 and past the EU deadline, the draft law on how the Directive will be addressed is still in the making. Following bilateral meetings with the Ministry of Environment and Waters, it is clear though that there is no ambition for Bulgaria to go beyond those items and there is no clarity on how the law would be implemented in practice.

Despite the fact that according to EU law there should be no export and landfilling of waste outside of the country where it was generated, Bulgaria continues imports of waste mainly through its maritime routes – the port of Varna-west, from where the waste bales are transported to cement kilns and incinerators and are being burnt. It is likely that the imported waste has been declared to be RDF (refuse-derived fuel) and is thus being transported to other EU countries.

As the Center for International Environmental Law 2019 report “Plastic & Health: The Hidden Costs of a Plastic Planet” states, a recent analysis of all plastic ever made estimates that the global production of plastic has increased from 2 million metric tons (Mt) in 1950 to 380 million Mt in 2015. By the end of 2015, 8,300 million Mt of virgin plastic had been produced. Significantly, roughly two-thirds of all plastic ever produced has been released into the environment and remains there in some form— as debris in the oceans, as micro- or nanoparticles in air and agricultural soils, as microfibers in water supplies, or as microparticles in the human body.

Since 2016, a [local NGO from Varna](#) has regularly published photos and videos on their Facebook page of imported baled waste, which has entered the country through the port Varna-west and from there is transported by rail. Since 2018, the import has become more regular, which is related to the ban in China for plastic waste imports and over 20 other recyclable materials.

The composition of the imported waste is unclear because, despite numerous efforts of NGOs, requests of information, and pledges for transparency from the current caretaker government of Bulgaria (as of May 2021) that have been ignored. Considering the global waste pollution, the inefficient separate waste collection system in Bulgaria and the new investment proposals for



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construction of waste incinerators of the country, we could argue that plastic pollution directly and indirectly impacts the health of communities.

[In November 2020, research was done in Bulgaria among 10 famous people that showed that their bodies contain traces of 17 types of phthalates and phenols](#), among which monoethyl-phthalate and metilparaben had highest levels. The research was conducted in the Norwegian institute for public health and aimed at identifying the substances that are found in the human body as a result of the use of single-use packaging. The plastic in the food packaging contains toxic substances, which fall into our food and are absorbed by our bodies. According to specialists, some of these substances could be accumulated in the human body and could lead to different diseases such as diabetes and hormonal disbalances such as hypothyroidism, fertility problems, etc. The plastic packages contain a wide spectrum with thousands of chemicals, many of which have not been adequately tested for toxicity. Those chemicals as well as among 30,000 and 100,000 added substances have the potential to pass from the packages to the food.

In Bulgaria, the waste import and resulting increased waste incineration in the thermal power plants and cement kilns have further impacted communities, which are often in already heavily industrialised and polluted areas. Such is the case with the community in the north-east town of Devnya (called “the valley of the big chemistry”), where waste has already been burnt for years in a cement plant and an incinerator, and now there are additional investment proposals for the construction of yet more new incinerator installations. The local community claims that the air is very polluted; however, there is an official measurement air quality installation far from the industrial area, which does not show the real situation on the ground. People install mobile air quality monitoring stations to confront this.

2. Plastic pollution, management and disposal

Every Bulgarian uses over 1,000 plastic bags annually. Every year over 200,000 children in the Bulgarian kindergartens throw away 240 million single-use plastic cups. Plastic bottles are a main pollutant, as there is currently no existing deposit system in the country.

According to the [National Statistics Institute](#), plastic packaging in Bulgaria is by far more than other types of packaging, amounting to 162,921 tonnes for 2019, or 29% of the total packaging. This means that with the low recycling rates for the country, plastic is prone to be contained in the RDF fuel sent to the cement kilns, incinerators and thermal power plants. This shows even more the urgent need for Bulgaria to implement the EU SUP Directive and be ambitious in introducing a ban on even more single-use plastic items and implementing it. Bulgaria, more than ever, needs a revision of the separate waste collection system introducing door-to-door collection.

Packaging reached the market in Bulgaria, total

Material	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Plastic	81978	94963	96123	96547	102093	99532	108247	119962	131359	162921
Paper / carton	138716	110270	122270	134270	129580	135642	148229	153212	168840	138797
Metal	15744	13414	14587	15887	15998	25147	31890	33594	37625	31233

(tonnes)



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Wood	18741	21444	20121	24725	48725	45612	51400	59589	65011	79649
Glass	63962	69374	70521	74017	78251	82017	77421	83517	90950	124017
Others	2055	5174	5174	4597	4021	4597	3958	3320	3708	17873
Total	321197	314639	328797	350043	378668	392547	421145	453194	497493	554489

3. Levels of plastic pollution and plastic waste

There is no official information available in Bulgaria on the plastic imports and exports. As described above, this information, despite requested, is not publicly available.

According to the National Statistics Institute, the plastic waste from the municipal solid waste in Bulgaria follows the trend shown below:

Type of waste	2015	2016	2017	2018	2019
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Total quantity of toxic and non-toxic waste (in tonnes)	136890293	117091894	122315892	126138159	46787248
Total quantity of non-toxic waste (in tonnes)	123814233	103928268	108304466	112824785	33617991

Plastic waste (in tonnes)	187,923	178,766	136,647	85,708	242,511
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Waste from textiles (in tonnes)	11882	9577	107175	23064	45485
Waste from equipment (in tonnes)	27233	15500	12183	11930	498
Waste from the automobile industry (in tonnes)	700	770	2033	2090	34

In 2019, the total quantity of plastic waste from municipal solid waste amounted to 0.7% of the non-toxic waste produced in Bulgaria, which overall seems low. In other comparable waste categories, quantities of waste from paper and carton are higher (with 365,593 tonnes in 2019). However, plastic is also found in textile, automobile and equipment waste, which adds to the quantities.

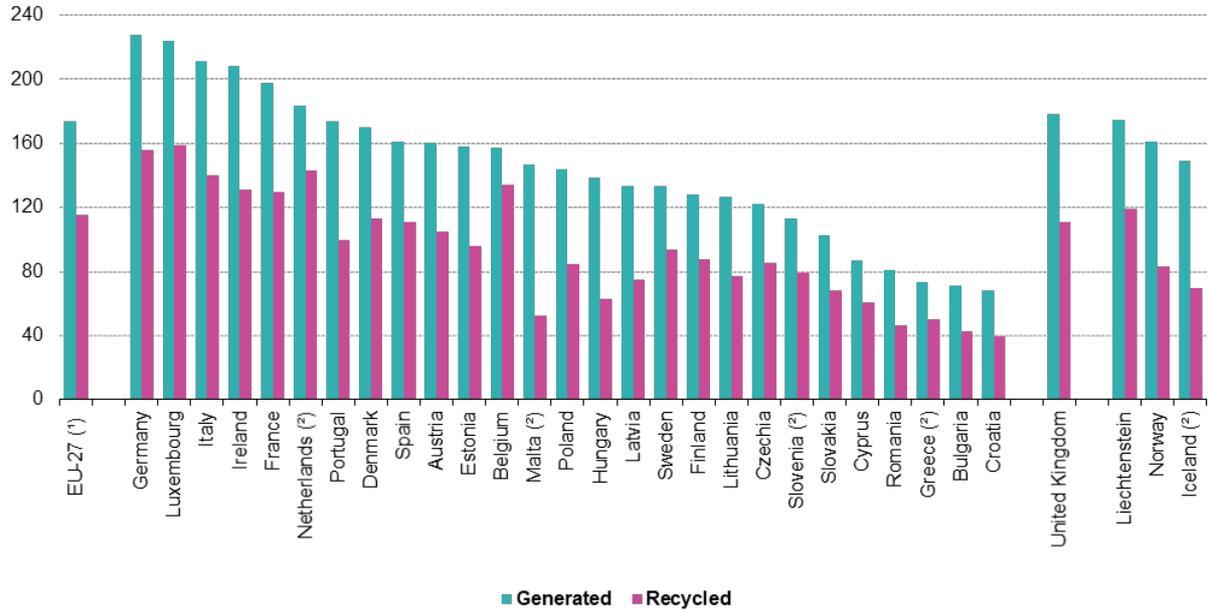
What is specific for Bulgaria is that waste is burnt in cement kilns and thermal power plants, apart from waste incinerators.

[Packaging waste generated by material in Europe:](#)



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Packaging waste generated and recycled, 2018 (kg per capita)



Note: Countries are ranked based on "Waste generated".

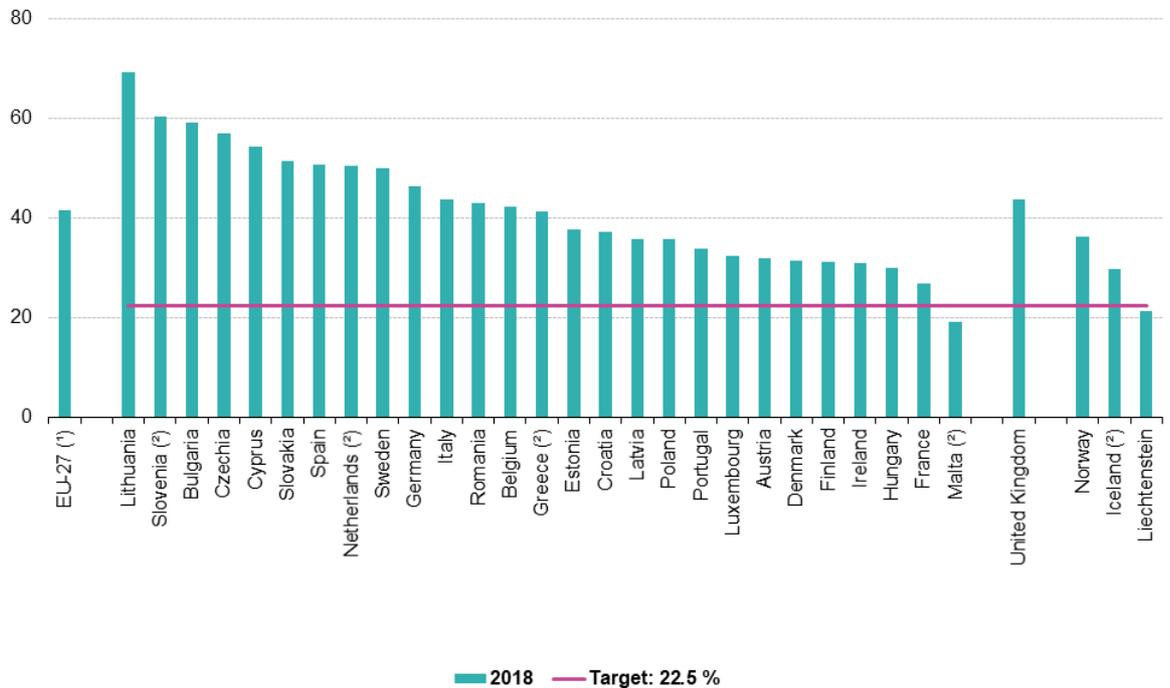
(*) Eurostat estimates.

(†) 2017 data instead of 2018.

Source: Eurostat (online data code: env_waspac)



Recycling rate of plastic packaging waste, 2018 (%)



(*) Eurostat estimates.

(*) 2017 data instead of 2018.

Source: Eurostat (online data code: env_waspacr)

4. Imports and exports

By 2018 Bulgaria had no chance to enter the global business of waste shipment, since China held over 50% of the global import. But following China’s ban on the import of waste, the global waste trade faced a serious crisis. Every day, over 1.7 million tonnes of waste were produced by the rich countries, industry excluded. Scientists calculated that by 2030, due to the Chinese ban, over 111 million tonnes of plastic waste would have no clear destination. The countries that replaced China were then South-east Asia and Eastern Europe, Bulgaria included.

According to UN data, as quoted by a Bulgarian economic investigative journalist¹, the import of waste in Bulgaria for the period 2014-2018 amounts to 41 million USD and when you add the cellulitis, paper waste and textile waste products, the amount adds to 140 million USD. The import of plastic waste in Bulgaria seems to be more significant after 2005 to cover the needs of the new recycling enterprises. Since the separate collection systems in Bulgaria are inefficient, it is needed to import plastic waste from Austria, Serbia, Macedonia and Albania. In 2018, one third of the plastic waste is imported from Greece.

¹ <https://bodil.bg/2020/04/10/waste-burners/>



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Table 4 Data according foreign trade statistics - total import and export for Bulgaria of selected waste streams

Description	2014		2015		2016	
	Import	Export	Import	Export	Import	Export
Agro food waste	134749	421781	138729	448861	187387	458583
Slag and ashes	61750	9527	59609	15916	43515	6885
Plastic wastes	15524	10107	28175	9119	36490	8938
Rubber wastes	4105	1143	2979	804	989	822
Wood wastes	20701	166804	48523	165048	60497	129928
Paper and cardboard wastes	19360	66680	21749	89515	22283	97394
Textile wastes	38798	23286	39347	22909	45668	24348
Glass	25614	492	30257	331	54586	50
Iron and steel scrap	115480	404535	105102	238253	94361	240920
Non-ferrous metal scrap	95499	34179	102589	33434	88549	39248
Ships for breaking up	2238	1390	1	5156	-	-
Miscellaneous	6692	948	12962	759	32614	320
Total	540511	1140872	590020	1030105	666939	1007436

(Source: https://circabc.europa.eu/sd/a/f6b08d5d-a4e1-4dbb-afb7-66fa15a6a6e4/BG_Methodology%20REPORT%20food%20waste%202017.pdf)

So far it is known that 72 000 tons of waste were imported to Bulgaria in 2017 to be incinerated in cement kilns, and in 2018 - 85,000 tons, 3% of which were co-incinerated in coal-fired power plants.

The waste trade reaches another level when the cement kilns enter the business. According to recent research, 35% of the production costs of the cement kilns are for electricity production. The RDF burned there is a “negative” cost, meaning that the cement kilns are being paid to burn the waste and in addition, they do not pay CO2 quotas. This is also beneficial for the waste exporters from Western Europe, since the treatment of waste is 10-15 Euros/tonne, while this cost is hundreds of Euros in other countries. This opens up space for introducing coal thermal power plants into the picture and starting to give the so-called complex permits to include incineration of RDF in the power plants as well.

There are five cement kilns in Bulgaria – Devnya cement, Volcan Cement – Dimitrovgrad, ownership of Heidelberg cement bought from Italcementi group – Italy; Pleven cement and Holcim Bulgaria – Bely Izvor ownership of Holcim Switzerland; Zlatna Panega cement – ownership of Titan Group Greece. They all have permits to use all kinds of fuel derived from waste.

Holcim-Beli izvor (in 2020)

100 571 t RDF = ca. 17 tonnes/hour,

+ 3859 tonnes tyres

Zlatna Panega - RDF, tyres

According to the operator, incoming waste consists of: packaging and industrial waste (waste plastics, foils, plastic and composite packaging); paper; cardboard; wood (pallets, etc.); textiles; rubber; and others. (2020)

5500 tonnes/tyres, 12500 plastics and rubber

Devnya Cement (2020): 108 740 tonnes RDF



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Cement kilns in Bulgaria do not pay for waste fuels; rather, they charge gate fees to accept RDF and other combustible waste. Currently licensed incineration and co-incineration facilities are only allowed to burn imported waste up to 50% of their capacity, the rest of the ‘waste fuel’ must be domestically sourced. However, the cement industry complains of the rather low-quality of RDF in Bulgaria (high levels of moisture and inert materials due to non-existent or dysfunctional separate collection of biowaste, construction waste, etc.) and are pushing to remove this limit ([source](#)). It can be assumed that 50% of the amount of RDF co-incinerated in cement kilns in Bulgaria is 50% of the amounts quoted above for the 3 main cement kilns; that is, at least 114 000 tonnes of imported combustible waste for 2020.

According to Bulgarian legislation, the operators of incinerated waste cannot incinerate more than 50% of the total capacity. On the recent declarations by the current caretaker Bulgarian government as of July 2021 on their intentions to stop the import of waste for incineration, the Bulgarian Association of the Cement Kilns [strongly opposed quoting relevant EU and Bulgarian legislation](#) and claimed that the technologies are not polluting the environment.

In 2021, [the first imported waste](#) for the year was observed in January at Varna-West port. The imported waste is being transported to cement kilns like Devnya Cement. On average, Varna ports [accept waste every 25-35 days](#). The garbage, intended for burning, is imported in Bulgaria with code 19 12 10. These are the so-called RDF – modified fuels derived from waste. From direct observations on the RDF that is being burnt in one of the thermal power plants, in the town of Sliven, the RDF contains recyclable plastic as well as textile products.

[Using the law on access to public information](#), the NGO Public Environmental Center for Sustainable Development, in an attempt to access data for the quantities of imported, transported and derived fuel, asked five public institutions in Bulgaria for their sources and the enterprises that have operated with RDF fuel for the period 2014-2019. There were no clear answers and the institutions were re-sending the questions to each other. Some of the data is available from the annual reports of the cement kilns operators, but currently only one has differentiated quantities of domestic and imported waste for 2020.

In 2019, an international [investigation of OCCRP](#) - an international project for fighting organised crime and corruption for illegal waste trade and incineration in the cement kilns in Romania - showed that there is a large number of trucks with mixed waste that pass through Romania for Bulgaria. In December 2019, there was also [a scandal about illegal waste from Italy, which](#) resulted in the former Minister of Environment and Waters being arrested pending further investigation of the case.

5. Human exposure to plastic pollution

People are exposed to plastic pollution mainly through plastic packaging, especially the single-use plastics and the illegal landfills in forests and rivers.

Za Zemiata took part in a joint European project and [published results](#) from the initiative “Plastics in the Body,” in which 10 famous people in Bulgaria underwent lab testing for toxic chemicals. The results show that there were 17 types of phthalates and phenols discovered in the bodies of the selected musicians, artists and doctors.



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What are we breathing?

The incineration of waste releases carcinogenic persistent organic pollutants such as dioxins and furans, which are transported by air, accumulate in soil and water, and become a danger to human health. Due to the heterogeneous composition of RDF waste, other toxic gases are exhausted during combustion. For example, phosgene, hydrogen cyanide, carbon monoxide and other compounds with strong toxic effects are released from plastics. When plastic containing nitrogen, halogens, sulphur and other hazardous substances are incinerated, the process can lead to air and soil pollution from the gases and ash generated.

Looking at the 2018 annual report of the Devnya Cement company, which has one of the most modern wastewater treatment plants in the country, it is clear that the carbon dioxide emission threshold is exceeded twice; carbon dioxide – 8 times; nitrogen oxides – 14 times; sulfur oxides – 5.5 times; mercury – 4.6 times; and zinc – 2.5 times.

The chairman of PECSO indignantly stated, “Nobody also talks about nanoparticles coming out of (incineration) chimneys, because the laboratories in our country do not have the equipment to control them. By inhaling them, they enter directly through the cell membrane and damage the cell. The ultrafine dust particles are initially emitted as a result of combustion and are the most numerous.”

In 2017, Bulgaria was sanctioned by the European Court of Justice for regularly exceeding the limit values for fine particulate matter in the air. In December 2020, [the European Commission decided to refer Bulgaria to the Court of Justice of the European Union](#) for failing to ensure full compliance with the [Court judgement](#) of 5 April 2017, which found that Bulgaria had breached its obligations under the EU's ambient air quality legislation ([Directive 2008/50/EC](#)).

6. Environmental impacts of plastic pollution

In January 2021, due to major floods, some of the rivers in Bulgaria were [unprecedentedly flooded by plastic waste](#), which became a nationally-recognized crisis. Za Zemiata organized a protest under the motto: [A wave of plastic took over the Ministry of Environment and Waters](#), insisting on the introduction of a deposit system on the bottles.

The incineration of waste and RDF, both of which contain SUPs and high plastic waste volumes, leaves a toxic ash legacy that harms the environment and human health.

As stated in 2020 IPEN's report “Toxic Ash Poisons the Food Chain,” “ash and other residues from waste incineration contain dioxins, furans (PCDD/Fs) and a range of other highly toxic POPs at levels which are a threat to human health and the environment. Current management practices and regulatory threshold levels for POPs that contaminate incinerator residues are not preventing releases of POPs into agricultural settings, the food chain and the broader environment.”

Plastic waste pollution leaks as litter into the environment and harms the environment through incineration emissions and ash.

7. The Basel Ban and plastic waste amendments



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Following Turkey's decision to ban the import of certain plastic wastes, media reports indicate that this waste is ['leaking' into Bulgaria](#).

8. Toxic plastic recycling

RDF is promoted as energy recovery and Sofia Municipality in Bulgaria counts this for recycling. What is surprising is that there is plastic imported for recycling from countries with recycling capacities. [Some 300 000 tonnes of waste is imported for recycling](#).

Information on plastic waste and recycling in Europe is available [here](#):

9. Plastic waste and COVID 19

There has been a drastic increase in the use of single-use plastic products during the pandemic crisis. The Regional Health Authorities are prescribing the use of single-use plastic products in all catering companies, take-away restaurants, etc. This causes the generation of greater quantities of (practically) non-recyclable waste, which is then treated in sub-optimal ways - either landfilled or incinerated, increasing the pressure and toxic burden on ecosystems and human health.

10. Recommendations, from a public interest, NGO perspective, on reducing and eliminating sources of plastic waste and pollution in Bulgaria

- A petition against the import and incineration of waste has been sent to the Ministry of Environment and Waters: <https://ecovarna.info/en/the-petition-to-ban-the-import-of-waste-reached-the-ministry-of-ecology/>. The petition calls for a veto on the import of waste with code 19 12 10 for energy recovery in Bulgaria, as well as for improved control over the import of all types of waste for recovery, disposal, storage or re-export. One of the measures in this direction is the creation of a public register of imported, deposited, recovered and re-exported waste in the country, as well as of all companies engaged in this activity along the chain. Za Zemiata shared and distributed the petition; however, we discussed that we should start a more comprehensive information campaign to inform the public in an understandable way on what the risks are for the environment and human health from waste incineration and what the alternatives would be.
- A representative poll conducted just prior to the global pandemic outbreak in January 2020 showed that Bulgarians are ready and want ambitious measures to fight plastic pollution. The results are available [here](#). Some key results of the survey were communicated through infographics and media to inform people on the public opinion about who is responsible for the plastic pollution and what measures from the authorities are people ready to accept and apply in their life. The results of the survey fed into the petition launched later in the year with Greenpeace Bulgaria and sent to the Ministry of Environment and Waters calling for more ambitious transposition of the EU Directive on SUP.
- Over 84% of the interviewees expect that the institutions are the ones responsible for taking action in the fight with plastics, 50% believe that the producers should start thinking of alternatives, while 50% would like the users to take an active part in it. 82% are concerned that plastic products are damaging for their health. The study further shows that among the products most used on a daily basis are plastic bags, plastic bottles, 'carton' cups (with



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plastic film), food boxes and wet wipes. A large percentages of the interviewees are ready to give up on them (63% of the people for plastic bags, 35% plastic bottles; 42% carton cups; 35% single use plastic boxes).

- Za Zemiata further campaigns for the introduction of a [deposit system on all bottles](#).

Project Outcomes:

11. The activity conducted

- 1) A series of events were organized in Sofia related to the exhibition on the 8th March 2020. The date was also symbolic of the fact that the people who formed the initiative "[Devnya wants to breathe](#)" are 7 women from different ages.
 - A morning flash mob took place at the Ministry of Environment and Waters in Sofia with the people from "Devnya wants to breathe" holding photos of the polluted areas in their town and depositing an open letter against incineration at the Ministry.
 - An evening protest solidarity march occurred on the streets of Sofia uniting Sofia and Devnya citizens who protest against the new incinerators planned in their respective towns. The manifestation started from in front of the Ministry of Health and ended at the Ministry of Environment. Around 100+ people joined and some of the central streets were closed.
 - An exhibition in Sofia [opened on the 8th March](#) during the Sofia International Film Festival with a screening of the video. The exhibition was displayed in one of the most popular independent cinemas in Sofia between the 8th and 20th March. The opening was visited by about 30 people with opening speeches by the representatives of "Devnya wants to breathe" initiative. Flyers were distributed during the exhibition.
 - The video was promoted on the [Facebook pages of Za Zemiata](#) and "[Devnya wants to breathe](#)" and was viewed by over 13,000 people.
 - [Bulgarian](#) and [English](#) versions of the video were produced.
 - [An announcement was distributed for the events on the 8th March.](#)
 - [Articles with demands were produced.](#)
 - For the purpose of the action and outreach, there were visual materials produced – flyers, banners, posters announcing the exhibition, and other [outreach materials](#).
- 2) A preparatory visit was organized in Devnya and Varna in November 2020 to visit the region, identify the problems, and plan the exhibition.
- 3) A 2-hour online meeting was conducted in February 2021 with representatives of "Devnya wants to breathe" and Za Zemiata's zero waste and clean air teams to discuss the problems in Devnya, talk about pollutants, stations to measure, how to identify what is best to measure, and what the different sources of pollution are.
- 4) A 2,5 hour online webinar was organized on the 31st March by Za Zemiata in cooperation with Greenpeace Bulgaria, which gathered over 15 people from 7 local groups established to fight for clean air and specifically against incineration and coal power plants. The webinar was planned to be first out of a series in which people will gather more knowledge on the topics of incineration, how to organize, and what kinds of expertise everyone needs.



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A screenshot from the meeting is available [here](#):

- 5) Two articles were published on Za Zemiata's website and distributed through social and traditional media related to:
 - a) [Results](#) from the initiative "Plastics in the Body," in which 10 famous people underwent lab testing for toxic chemicals. The results state that there are 17 types of phthalates and phenols discovered in the bodies of the selected musicians, artists and doctors.
 - b) [GAIA's international call for action](#) (translated into Bulgarian) and the petition against incineration, with the following recommendations towards national and local governments, looking for solutions #beyondrecovery:
 - a. Chose zero waste, not burning
 - b. Participation of the informal recyclers and of the workers that deal with waste
 - c. Plastic free
 - d. Say no to waste incineration and invest in local solutions
 - e. Put people first

12. Communication with National or Local Authorities

An [open letter](#) to the Ministers of Environment and Waters and the Minister of Health calling for sustainable waste management without incineration was sent on 4th March 2021. The letter was also officially deposited at the Ministry of Environment during the morning flash mob on the 8th March. On the 6th April, we received a response only from the Ministry of Health, forwarding the case to the Ministry of Environment.

"Devnya wants to breathe" also wrote several letters to the Regional Agency for Environment and Waters and the Municipality of Devnya to complain about the upcoming investment for a new mobile installation for incineration.

13. Changes from the original plans

Initially, the exhibition was planned to be opened first in the town of Devnya, in the Mosaics Museum, following an opening in the town of Varna, and then in Sofia. However, due to the pandemic and closure of museums and ban on all events until end of February 2021, we had to reschedule the planned events and finally re-organized several events focusing on Sofia in March 2021.

An additional difficulty were the elections on April 6th, as media were extremely careful on the coverage and linkages to any political parties. Despite this complexity, the events were broadly reported.

14. Resources on plastic waste and pollution

- Plastic pollution petition by Za Zemiata and Greenpeace:
<https://www.zazemiata.org/plastic-free/plastic-polution/>



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- Plastic pollution in Europe, report by Greenpeace and Za Zemiata: https://anoncyberarmy.files.wordpress.com/2019/05/brochure-plastics_factsheet-bg-web.pdf
- A report on menstrual hygiene: <https://www.zazemiata.org/resources/menstrualna-higiena/>
- Brand audit at home results. How much plastic do we use: <https://www.greenpeace.org/bulgaria/istorii/4563/brand-audit-u-doma/>
- EU stats report on plastics and recycling for 2018 <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20210113-1>

15. Communication Efforts

There were direct live interviews on national media present at the different events, interviews on the national radio and other media reports from the events.

Media reports:

- 1 TV: <https://nova.bg/news/view/2021/03/08/318350/жители-на-софия-и-девня-излязоха-на-протест/>
 - 2 <https://nova.bg/news/view/2021/03/08/318485/еколози-срещу-инсталации-за-горене-на-отпадъци-в-софия-и-девня/>
 - 3 <https://eurocom.bg/new/ekoloji-izlyazokha-na-protest-sreshchu-instalatsii-za-gorene-na-otpadtsi-v-sofiya-i-devnya>
 - 4 Popular independent TV programme The Day: <https://fb.watch/4KKBJRJPSC/>
- Radio:
- 5 Bulgarian national radio: <https://bnr.bg/hristobotev/post/101434985/dishai-devna-vazmojnata-ne-vazmojna-promana>
 - 6 <https://bnr.bg/horizont/post/101433046/ekoloji-sreshtu-instalacii-za-gorene-na-otpadaci-v-sofia-i-devna?fbclid=IwAR35afL3o7I497xjmKeW02qKclY8WEBMXJUoxuNnUasDOS6rLockdzhK20A>
 - 7 <https://bnr.bg/post/101434985/dishai-devna-vazmojnata-ne-vazmojna-promana>
- Online media:
- 8 https://novini247.com/novini/prirodozashtitnitsi-izlyazoha-na-protest-pred-ekoministerstvoto-sreshtu-izgrajdaneto-na-instalatsii_3115538.html
 - 9 <https://offnews.bg/obshtestvo/grazhdani-ot-sofia-i-devnia-protestirat-sreshtu-mrasnia-vazduh-747334.html>
 - 10 <https://ecovarna.info/devnentsi-stignaha-do-sofia-v-protesta-si-za-po-chist-vazduh/>
 - 11 <https://www.ngobg.info/bg/news/123199-граждани-от-софия-и-девня-протестира-срещу-мръсния-въздух-и.html>
 - 12 <https://www.varna24.bg/novini/varna/Grazhdanski-sdruzheniya-ot-Sofiya-i-Devnya-se-obyaviha-sreshtu-izgaryaneto-na-otpaduci-1059625>
 - 13 https://3e-news.net/българия/граждани-в-девня-и-софия-на-протест-срещу-изгарянето-на-боклука-и-мръсния-въздух_85592
 - 14 <https://fakti.bg/mnenia/561176-zashto-ne-biva-da-stroim-poslednia-insinerator-v-es-finansiran-s-evropeiski-pari-danita-zarichinova-pred-fakti>



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- 16 <https://www.bg.news/71719/защо-българия-не-бива-да-построй-последния-инсинератор-в-ес-финансиран-с-европейски-пари-данита-заричинова-пред-факти/>

Za Zemiata's website:

Exhibition: <https://www.zazemiata.org/otkriva-izlozhba-malki-istorii-za-horata-i-kominite-v-devnya/>

Events on the 8th March 2021: <https://www.zazemiata.org/devnya-sofia-otpadaci/>

Video: <https://www.zazemiata.org/dishaj-devnya-video/>

Facebook:

Announcement for the exhibition:

<https://www.facebook.com/ZaZemyata/posts/3738229156255326>

Block post for women activists: <https://www.facebook.com/ZaZemyata/posts/3740371456041096>

Live streaming with "Devnya wants to breathe": <https://fb.watch/4fhKunHoYL/>

Photos of protests and exhibition:

<https://www.facebook.com/ZaZemyata/posts/3748370431907865>

Video:

<https://www.facebook.com/watch/?v=2787892018193044>

Twitter:

<https://twitter.com/zazemiata/status/1371495736236445701?s=20>

<https://twitter.com/zazemiata/status/1369601403245785088?s=20>

<https://twitter.com/zazemiata/status/1368839968479674369?s=20>

<https://twitter.com/zazemiata/status/1368838883878858753?s=20>

Instagram:

https://www.instagram.com/p/CL4Guo7jwqQ/?utm_source=ig_web_copy_link

https://www.instagram.com/p/CMCOk14j4Xz/?utm_source=ig_web_copy_link

https://www.instagram.com/tv/CMKjJ9PH2Ep/?utm_source=ig_web_copy_link

https://www.instagram.com/tv/CMKnmMGH7ol/?utm_source=ig_web_copy_link

https://www.instagram.com/p/CMci_kMjr3H/?utm_source=ig_web_copy_link

More photos are available here:

<https://drive.google.com/file/d/1gYMLfg6t07uCyrA267EGx9c1SHhYYXe7/view>

European partner's publication:

Friends of the Earth Europe [blog](#)

CEE Bankwatch Network [blog](#)

16. Outreach to government authorities and industry

There has not been any formal structure involved; we made an effort by reaching out to the Ministries of Health and Environment and Waters with the open letter.

There was an opportunity to comment on the National Plan for Waste Management 2021-2028, and Za Zemiata, jointly with other organisations, submitted [critical comments](#).