

Open Letter to the Ministry of Environment and Water of the Republic of Bulgaria A Deposit Return System for Bulgaria: Joining Europe's Success Story

Dear Minister Karamfilova,

As members of the Break Free From Plastic (BFFP) Europe network working to reduce plastic pollution, improve resource efficiency, and accelerate the transition to a circular economy, we welcome Bulgaria's efforts to introduce a Deposit Return System (DRS) for beverage containers.

Across Europe, deposit systems have proven to be one of the most effective environmental policies of the last decades. Countries including Germany, Lithuania, Finland, Norway, Denmark, Estonia, the Netherlands, Slovakia, Latvia, Romania and others have demonstrated that well-designed DRS can achieve return rates exceeding 90%, dramatically reduce litter, provide high-quality recyclable materials, and create the foundation for reuse systems.

We believe Bulgaria now has the opportunity to join this growing group of European success stories.

This opportunity comes at an important moment. The European Commission has recently raised concerns regarding Bulgaria's progress in meeting EU recycling targets. A well-designed Deposit Return System offers a practical and proven solution that can significantly improve separate collection, increase recycling rates, reduce dependence on virgin materials, and prepare the country for future reuse systems required under European legislation.

Experience from across Europe also shows that governance matters. The highest-performing deposit systems are operated by independent, not-for-profit organizations established and financed by producers and retailers under the framework of Extended Producer Responsibility (EPR). In those systems, public authorities play an equally essential role of guardian of the system. This is done by setting the legal framework, ensuring transparency, monitoring performance, and enforcing compliance.

This clear separation of responsibilities has consistently delivered efficiency, accountability, and public trust. It is also fully aligned with the principles of the EU Packaging and Packaging Waste Regulation (PPWR), which encourages strong EPR systems where producers take operational responsibility while public institutions provide oversight.

Beyond achieving separate collection and recycling targets, a successful DRS can contribute to Bulgarian broader strategic resilience. Every beverage container collected and recycled into new packaging helps retain valuable raw materials within European countries, reduces dependence on imported fossil resources, lowers greenhouse gas emissions, and strengthens the circular economy. Plastic is not simply waste - it is a valuable material produced largely from

fossil fuels. Recovering it efficiently means preserving resources, improving competitiveness, and enhancing our countries' resource security.

We therefore encourage Bulgaria to build its Deposit Return System on the foundations that have already been tested and proven across Europe: an independent operator, strong public oversight, transparent governance, and ambitious environmental objectives.

We are confident that Bulgaria can establish a modern Deposit Return System that benefits citizens, businesses, and the environment alike, while becoming another example of successful implementation within the European Union.

Our organizations remain ready to share expertise, practical experience, and lessons learned from countries that have already successfully implemented Deposit Return Systems.

We look forward to seeing Bulgaria become one of Europe's leading examples of circular economy success.

Sincerely,

Center for Environment, Bosnia and Herzegovina

Changing Markets Foundation, Netherlands

Društvo Ekologi brez meja, Slovenia

ECOS (Environmental Coalition on Standards), Belgium

Everyday Plastic, UK

European Research Institute, Italy

Facing Finance, Germany

Fair Resource Foundation, The Netherlands

Friends of the Earth Cyprus, Cyprus

Friends of the Earth - SPZ, Slovakia (Priatel'ia Zeme - SPZ) , Slovakia

Gallifrey Foundation, Switzerland

GLOBAL 2000 - Friends of the Earth Austria, Austria

Ocean. Now!, Germany

Retorna, Spain

Sciaena, Portugal

VšĮ Žiedinė ekonomika, Lithuania

Voice Of Irish Concern for the Environment, Ireland

Women Engage for a Common Future, Germany

Zelena akcija / FoE Croatia, Croatia

ZERO - Association for the Sustainability of the Earth System, Portugal

Zero Waste Austria, Austria

Zero Waste Estonia SA, Estonia

Zero Waste Europe, EU

Zero Waste Montenegro, Montenegro

Zero Waste Society, Ukraine

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