NEW PSYCHOACTIVE SUBSTANCES IN BULGARIA

CHALLENGES TRENDS AND CONTEXT

NARCOMAP

IMPROVING KNOWLEDGE ON NPS AND OPIATES TRAFFICKING IN EUROPE

RiskMonitor

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ROSSEN BOSSEV
YOVO NIKOLOV
YULIA GEORGIEVA

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Challenges, trends and context

Authors: Rossen Bossev, Yovo Nikolov, Yulia Georgieva

Coordinator for RiskMonitor: Julia Rafailovich

RiskMonitor Foundation ©
Bulgaria, Sofia 1000, Tzar Osvoboditel Blvd. 29
e-mail: riskmonitorinfo@gmail.com
www.riskmonitor.bg

СЪДЪРЖАНИЕ

LEARNING POINTS (RESUME)

The United Nations Office on Drugs and Crimes define New Psychoactive Substances as “substances, which are not included in the UN Convention on Drugs from 1961 or in the UN Convention for psychotropic substances from 1971, and which may pose a threat to the health of citizen, similar to that from substances, included in those conventions.” The agency also makes ot clear that regardless that some of them are newly developed, it is not necessary for all NPS to be new. Some NPS are known to science for 30-40 years but their misuse and abuse started to occur recently.

NPS have become a global phenomenon with 110 countries from all across the globe having reported one or more type of NPS on their territory. Till December, 2017 more than 800 new substances have been reported to the UN’s early warning agency.

The convection on drugs, which was signed in 1961 officially declares the start of the war on drugs. A global fight against illegal drugs begins on a massive scale. The ambitious goal this war on drugs has is to achieve a world free of illicit substances. Unfortunately, such restrictive measures do not achieve the desired result, which the organized criminal groups, who deal with drugs invest enormous amounts of money to avoid getting caught and protect their businesses. The secondary effects of the war on drugs are many and far reaching, beginning with violations of human rights to drug crimes, to division of market chunks and death. As a result of this unofficial war there is a spike in blood borne infections such as HIV and hepatitis among drug users, increased environmental contamination etc. It is safe to say that every person is directly or indirectly affected by the problem.

Soon the market becomes infused with new substances, which were never before seen or used. These are the so-called New Psychoactive Substances, known on the black market as “designer

drugs", "bath salts", etc. Their chemical structure is similar to the already banned "traditional" substances (like cannabis, cocaine, heroin, LSD, MDMA (ecstasy) and methamthamine). By modifying the basic molecule of the substance, the "designers" produce a new drug, which does not fall into the description in laws, which prohibit the original drug. The new substance is very hard to determine and analyze but its effect on the user is similar to that of the traditional drug.

NPS are many times more powerful and easier to get hold of. Supply and demand is mostly dune over the internet via postal and currier services. This makes it harder for the transactions and suppliers to be identified, caught or monitored.

As a whole, the expanse of the NPS market is possible also thanks to the increased connectivity in the world, globalization processes and internet. Many NPS are being manufactured in China and India. They get sent from there to Europe where they get packaged and shipped to the users. Some NPS are produced based on medical drugs, which get veered from their basic course and enter the illegal networks. Other substances are produced in illegal laboratories, based in Europe and other regions.

Experts, working in the field of lowering demand pf psychoactive substances are also is a very difficult situation, where defining the type of substance used is nearly impossible and that heavily hinders the work of doctors. Toxicologists and therapists. The programs for reducing the harm from drug use are also is a hard position. The measures and methods, used for traditional substances are not suitable for NPS, because the latter are rarely injected. People, who use them have an entirely different behavior, habits and life styles compared to users of traditional drugs. The former usually use in nightclubs, festivals and the like, where traditional users rarely go and vice versa.

NPS changed the habits and behavior of user dramatically. They also often are not aware of the substance they consume and take a far greater risk of overdose, while the secondary health and psychological effects of NPS are unknown, but potentially many times greater than those of traditional psychoactive substances. NPS users often are hospitalized with heavy intoxications.

In Europe NPS distribution begins in the 90s with the so-called designer drugs. In late 2016 the European Monitoring Center for Drugs and Drug Addictions monitors over 620 new substances, which are being distributed on the European drug markets. Most are being passed off as “legal” substitutes on illicit drugs, while others are targeted to users, interested in experimenting with new drugs, offering different experience. Once offered as legal, NPS multiply exponentially and pose a significant risk to public health, to the police and policies in the field of narcotics.

Until about a decade ago only several new substances emerged per year in Europe. Most were sold on the black market as amphetamines or ecstasy. Some were sold especially and were searched for by their specific name, other were offered as a new type of ecstasy. They were manufactured in low quantities.

Today most of the NPS are banned by the laws in different countries. in the UK all of them are now illegal. Although the number of new drugs entering g the European markets is slowly beginning to fall, a new substance still gets realized on the European market every week.

Along with legal drugs markets and lab chemicals, there are many other products, containing NPS, which are sold as diatary supplements. They are not targeted at people, who use drugs for recreational purposes but to those who wish to improve their looks or concentration. This way NPS reach new groups of users.

NPS can emerge on the illegal markets as a result from redirecting legal drugs. Over the past years his group of NPS is becoming more

important because of misuse of prescription drugs in the EU and illegal import of medical drugs from third countries.

The emergence of NPS in Europe raises many questions about the health risks arising from their use and misuse, and the problems that would arise in law enforcement cooperation if a substance is put under control in some European countries and in others - it is not. This can be mitigated by exchanging information and by establishing a procedure for the risk assessment of the use of these substances and possibly placing them under control.

The issue led to the establishments of the Agreement for Joint Action regarding information exchange, risk assessment and controlling NPS.

Over the last years the EMCSSA has become more active in monitoring NPS. Which are not included in the two UN conventions, and which pose a public health risk. In the case of Bulgaria, the fast developing tendency of illegal traffic and NPS market led to a bill of amendments to the Substances and Precursors Control Act in 2011, which introduced a new classification of different substances and a new, faster way for new substances to be included in this classification. As a result, most NPS are banned under Bulgarian law today.

HISTORY AND CONTEXT. NPS TODAY

The Single Convention on Narcotic Drugs, signed in 1961, officially declares war on drugs. Globally, there is a massive pursuit of trafficking and the use of illegal substances, the ambitious goal of which is to reach a drug-free world. Unfortunately, such restrictive measures do not produce the desired results, and organized drug distributors invest a huge amount of money to avoid persecution and keep their business.

The UNODC defines New Psychoactive Substances as "substances not included in the 1961 United Nations Convention on Narcotic Drugs or in the 1971 United Nations Convention on Psychotropic Substances, which may constitute a danger to the health of citizens comparable to that of the substances included in those conventions'. The UNODC also states that although some substances are indeed newly invented, this is not a requirement to being assigned to that group. Some NPS have been known for over 30-40 years, but were not misused until recently.

In Europe, the spread began in the early 1990s with the so-called "Designer Drugs," and by the end of 2016, the European Monitoring Center for Drugs and Drug Addiction was monitoring more than 620 new psychoactive substances sold on the European drug market. These substances are not covered by international control mechanisms and include a wide range of drugs, including synthetic cannabinoids, stimulants, opioids and benzodiazepines. In most cases, they are marketed as "legal" substitutes for illicit drugs, while others target small groups of people willing to experiment with them for allegedly new effects. Marketed as "legal," the new psychoactive substances are multiplying exponencially and pose a significant risk to public health and a challenge to drug policy.

Until just over 10 years ago, only a few new psychoactive substances have emerged in Europe every year. Most found a place

on the market for illicit drugs, where they are usually offered as amphetamines or ecstasy (MDMA). Some get marketed as special drugs and searched for by their name and others as a new type of ecstasy. They were produced in small quantities in amateur laboratories or on an industrial scale in illegal laboratories of organized crime groups.

Globally, more than 110 countries and territories reported one or more NPTs, and by December 2017, the UNODC Early Warning Service (EWA) for NFPs received information on more than 800 substances detected globally.

The Single Convention on Narcotic Drugs, signed in 1961, officially marked the beginning of the War on Drugs. Thus begins the global mass persecution of the use and trafficking of illegal substances. The ambitious goal that the convention sets for itself is to achieve a drug-free world. Unfortunately, such restrictive measures do not lead to the expected result, and organized drug distributors invest huge funds to avoid persecution and keep their businesses up and running. The side effects of the War on Drugs are vast and far-reaching, spanning from human rights violations, to drug-related crimes, market distribution between illegal enterprise fractions and death. As a result of these unofficial wars, there has been an increase in outbreaks of blood-bearing infections such as HIV and hepatitis among people using drugs, environmental pollution, etc. Virtually every person, directly or indirectly, is affected by this problem.

The response from organized criminal structures is rapid and effective. Substances that have not been used so far are starting to emerge on the market. These are the so-called New Psychoactive Substances or NPS, known on the black market as “designer drugs”, “legal highs”, “bath salts” etc. Their chemical structure resembles that of the already banned and persecuted “traditional” drugs like cannabis, cocaine, heroin, LSD, MDMA (ecstasy) or methamphetamine. But by slightly modifying the main molecule of the substance,

a new substance is actually created, as far as the law is concerned. The new drug does not fall under the prosecuted substances and therefore is difficult to catch and stop. At the same time, given the chemical structure is very similar to the original, the effects of the prosecution-free substance are almost identical to the effects of its traditional counterpart.

NPS are many times stronger, cheaper and more affordable than their traditional cousins. The supply and demand of NPS is mainly carried out through the Internet, through couriers and postal services. The distribution structure is incredibly versatile and flexible, which makes it very difficult for distributors to be captured or identified.

Overall, the market growth for the NPS is also possible because of the increased global connectivity, driven by globalization and the Internet. Many NPS are produced in large quantities by chemical and pharmaceutical companies in China and India. From there they are sent to Europe, where they are processed into finished products, packaged and sold. Some NPS are produced on the basis of medicines that are diverted from legal supply chains or are produced illegally. Other substances are produced in illegal laboratories located in Europe or in other regions.

Experts working in the field of demand reduction for psychoactive substances are also in a very difficult situation because identifying the type of substance used is almost impossible. This hampers the work of physicians, toxicologists and therapists alike.

Harm reduction programs are also facing many difficulties. The measures that apply to traditional substances are not suitable in NPS. Most of these measures are designed for injecting users but NPS are rarely injected. People who use NPS have completely different behaviors, habits and lifestyles, and the usage usually happens at festivals, nightclubs, etc.

The phenomenon of the new psychoactive substances has also radically altered the habits and behavior of those who use them. They also often have no idea what they take. This, along with the fact that most NPS are many times stronger than traditional drugs leads to a significantly higher risk of overdose. The adverse health and mental consequences of using NPS are unclear, but with the potential to carry repeatedly higher damage than “traditional” psychoactive substances and users of NPS are often hospitalized with severe intoxications.

Today, a very large part of new psychoactive substances is banned in many European and other countries, while in the UK all NPS are banned. Due to NPS’s rapid inclusion in the prohibition lists, the definition of “legal highs”, which is still used sometimes, is in most cases inaccurate. Although there is a slight decline in the newly created NPS still a new substance enters the European markets every week on average.

NPS may appear in the illegal market and because of diversion of legal drugs. In recent years, the NPS have gained significance due to the misuse of prescription drugs in the European Union and increasing illicit imports of medicines from outside the EU.

The emergence of new NPS in Europe and the various legal frameworks within the EU presents the problem that arises from the cooperation between law enforcement authorities in different countries if a substance is placed under control in one European country, and not in another. It is agreed that this situation can be improved by exchanging information and by establishing a procedure for the determination of the risk of the use of these substances and their possible placing under control.

This led to the creation of the Joint Action of 16 June 1997, which addresses information exchange, risk assessment and the placement under the control of the NPS. The Joint Action Agreement adopts a three-step approach to action: Information exchange – the

early warning system; Assessment and the procedure for the placing under control of new substances.

In recent years, the European Monitoring Centre for Drugs and Drug Addiction has become increasingly active in monitoring the NPS, which are not included in the UN conventions, but which pose a public health risk or a societal risk. Until recently, this activity was carried out under the terms of a specific legal instrument adopted by the EU Council on 10.05.2005, Council decision 2005/387/JHA on the exchange of information, risk assessment and control of new psychoactive substances. In practice, this instrument is a revision of the Joint Action of 16 June 1997.

At 21.11.2017, the Council of the EU adopted Regulation (EU) 2017/2101, which replaces decision 2005/387/JHA of 2005 in order to reinforce the early warning system and accelerate the process of risk assessment. Directive (EU) 2017/2103, which includes the NPS in the definition of ‘ narcotic ‘, is also adopted on the same date. The EU Member States are required to ban the new substances for which the European Commission has decided to include in the definition of ‘ drugs ‘ within a period of 6 months.

In Bulgaria, the ever-evolving and rapidly growing illegal trafficking and the expansion of the NPS market became basis for the adoption of amendments to the Control of Narcotic Drugs and Precursors Act and to the creation of a new body within the Council of Ministers for classifying substances as narcotic drugs in 2011. These normative changes allow the NPS to be more quickly included in the prohibition lists in the new institution.

As a result of these actions, a large proportion of new psychoactive substances are banned in Bulgaria.

CHARACTERISTICS OF NEW PSYCHOACTIVE SUBSTANCES (COMPARED TO TRADITIONAL DRUGS)

Chemical structure Classification According to the United Nations Office on Drugs and Crime:

- Aminoindans – These are stimulants that are an amphetamine analogue. Some of the most prevalent are MDAI, 5-IAI and 2-AI;
- Tryptamins – These are hallucinogens, derivatives of psilocybin and DMT. Some of them are 5-MeO-DMT, 5-MeO-DPT, AMT, 4-AcO-DMT and 4-AcODiPT;
- Substances, similar to phenciclib-these are substances structurally similar to phenciclib (ORD) and ketamine and classified as arylcycloalkylamines. They act on the central nervous system (CNS) primarily as stimulants or as a dissociation. Representatives of this group are 3-MeO-PCE and 4-MeO-PCP;
- Synthetic cannabinoids – these are cannabinoid receptor agonists, which cause effects similar to those of tetrahydrocannabinol, the main psychoactive substance in cannabis. Synthetic cannabinoids are often mixed with plant products and sold under names such as “Spice”, “K2”, “Kronic”. Some such substances are JWH-018, JWH-250, AM-2233, AKB-48, AB-PINACA;
- Synthetic cathinones – these are analogues or derivatives of cathinone (a substance under international control and one of the active ingredients of the plant). They usually have a stimulant effect and include commonly reported new psychoactive substances such as mephedrone and MDPV;
- Phenethylamines – This group includes the substances amphetamine, methamphetamine and MDMA and many new ones

with a similar chemical formula. They usually act as stimulants, but in modifying them, strong hallucinogens such as Bromo-Dragonfly can be obtained. Some of the most common are 2C-E, 2C-I, 4-FA, PMMA, 4-FMA, 5-APB, 6-APB and 2C-C-NBOMe;

- Piperazine – These substances are often sold as ecstasy because they act as central nervous system stimulants. In rare cases, they may perform the function of opioids (MT-45). The most frequently reported substances of this group are benzylpiperazine (BZP), mCPP (1-(3-chlorophenyl) piperazine) and TFMPP (1-(3-trifluoromethyl-phenyl) piperazine);
- Substances of plant origin – this group includes plants with psychoactive properties. The most commonly reported are:
- Krathom – A plant native to Southeast Asia, which contains the alkaloid mitraginin. Acts as a stimulant in low doses and as a sedative in high;
- Contain the active substance Sage divinorum, a plant native to the wooded areas of Oxaca, Mexico. Salvirnorin A, which is a hallucinogen;
- Kat – A plant native to the Somali peninsula and the Arabian Peninsula. The leaves of the plant are chewed and secrete stimulants cathinnon and Katyn.

Other substances:

- Substances imitating the effects of classical hallucinogens (LSD, DMT). May also have residual stimulating effects;
- Opioids – central nervous system depressants. They have action similar to morphine;
- Sedatives/hypnotics – central nervous system depressants. Mimic the effect of substances like benzodiazepines;
- Substances imitating the effects of traditional stimulants such as cocaine, amphetamines, methamphetamines and ecstasy.

HEALTH ASPECTS AND SOCIAL CONTEXT

The key change that occurs with the NPS consists in practices related to the use and modes of production and distribution. This change is largely enshrined in the reasons and in the context in which NPS emerge, namely in the quest to avoid and outsmart prosecution and law enforcement by users and distributors. The main transformation here comes from the chemical formulas of the substances and the ability to manipulate them in a way that allows to circumvent the law enforcement mechanisms. It is a simple and rational motive from the supply side and it is not in itself unique. However, it takes place in the context of some already high-tech and globally connected market and production infrastructure, because of which the optimization does not develop smoothly, but represents a sharp and huge leap in the possibilities of supply.

These are the basic prerequisites for an exponential and continually growing production. The third determinant is the possibility of expansion of the market, which the Dark Net gives to the spread. The network automatically facilitates a high level of access to substances that have previously been hindered by users.

Another grave and purely economic factor, contributing to the widespread of NPS the dramatic price reduction. This is a natural economic model, identical to the fall of each commodity, which manages to achieve massive production at extremely low prices. As we will see further, similar to a row of other mass industries (clothing, equipment, household goods, etc.), the production takes place in China, as the case with a variety of other goods.

In addition to the price the analogue world provides some purely social barriers to access: the consumer must be familiar with the places and people without which they could not procure the illegal substances. They must meet and connect with them in person. Besides the risk that accompanies the close communication with the

distributors, there is a non-obvious factor in play and that is, broadly speaking, the social environment one inhabits. Of course, the question of the so-called social environment is too complex to express unambiguously, and it must always be taken into account that one never inhabits only one environment – even in the world preceding the digital age; That the social interactions and roles in a person's life are diverse and often unrelated or dictated by a strictly demarcated ' environment '. But at the same time, it should be noted that the Internet leads to a universal and impersonal access, which was unthinkable before the internet. As far as risk is concerned, it has dramatically dropped thanks to encrypted networks and currencies and has made transactions for illicit substances easy and low-risk.

Information on the long-term adverse effects and risks from the NPS is not yet clear. This is one of the main dangers of treatment and emergency care, for example, as very often doctors do not know the effect of which substance they are treating. Moreover, although at expert level knowledge of the substances themselves and their molecular composition (MDAI, 5-MeO-DMT, 5-MeO-DPT, AMT, etc.), these substances take the form of a pill without clear origin or accompanying information. In this sense, the practices of use often make it impossible to know what the substance is. On another level due to the huge variety of "designer drugs" the majority of them were not tested on humans, and many of them were not tested even on animals. This makes it almost impossible to predict the risks and their effects on users, as well as their treatment in case of overdose and intoxication.

FEATURES OF THE MARKET (COMPARED TO TRADITIONAL DRUGS)

Overall, the market growth for the NPS has been made possible mainly because of the increasing global connectivity in recent decades, driven by globalization and the Internet. Many of the NPS are produced in large quantities by chemical and pharmaceutical laboratories in China and India. From there they are sent to Europe, where they are processed into finished products, packaged and sold in wholesale and retail. Some NPS are produced on the basis of medicines diverted from legal supply chains or produced illegally. Other substances are produced in illegal laboratories located in Europe or in other regions. Data from various indicators, including the number of illegal laboratories detected and analysis of open quantities of waste from the production of synthetic drugs, as well as seizures of drug precursors show that in Europe over the last For several years there has been an extension of this type of production. According to a study from December 2017, most NPS are stimulants followed by synthetic agonists of cannabinoid receptors and classical hallucinogens.

Some NPS are sold openly through the visible part of the Internet and in specialized physical stores, often in the form of "legal stimulants". In addition, they are also sold through online markets in the ' dark web ' and the illicit drug market, in some cases under their respective names, and in others, for the purpose of deception, are offered under the name of illicit drugs, including heroin, cocaine, ecstasy and Benzodiazepines. In these cases, there are large risks to users who think they are taking a "traditional" substance, and in fact it is mixed with the NPS, which has a more powerful and unpredictable effect.

With the development of the Internet, the encrypted connections and the "darknet" most of the supply and demand of the NPS

passes along these roads, usually the customer and the dealer do not even meet in person to carry out the transaction, but do it anonymously with the help of mobile Applications, web forums, specialized sites, internet wallets and cryptocurrencies are used, and the substance is obtained after a message sent by the dealer (Viber or another instant messenger) with a specific location or through courier services. In the distribution structure thus created, it is very difficult for distributors to be captured or identified.

More than 70% of the new substances found through the EU early warning system have emerged in the last five years. In 2016, 66 new substances were found in Europe.

The action, for example, of the most widespread NPV in Bulgaria (the so-called "Herb " or "tea ") is instantaneous, usually it is at times stronger than that of marijuana, although it resembles it, because it affects the same receptors. The process of making this type of NPV does not allow precise dosage, which creates a real risk of overdose, which can lead to blockage of breathing and even death. In Bulgaria there is a proven death due to the use of a synthetic cannabinoid and at least another one for which there are serious suspicions.

In its monitoring in 2013, the European Monitoring Centre for Drugs and Drug Addiction identified 651 Internet shops selling "legal drugs" or "laboratory chemicals" to EU consumers. There are many more online stores selling food supplements that contain new psychoactive substances, but they are not regularly monitored by drug monitoring systems.

The emergence of the NPS has a serious impact on the supply chain of the drug market in Bulgaria: they are of much higher potency, which eases their traffic. Hundreds of thousands of single doses can be distributed in very low volumes. They are undetectable for standard field tests. In order to prove that these are illegal substances, it is necessary to check the content in licensed laboratories

and with specific reagents that are often not available in systems operating in the field of psychoactive substance supply reduction.

In Bulgaria there are only two laboratories that can analyze the composition of these substances. One is located in the Research Institute of Forensics at the Ministry of Interior and the other is at the Customs Agency. The head of the laboratory to the Ministry of Interior was one of the interviewees for the purposes of this research and told the authors that the Institute's capacity is extremely small and difficult to cope with the amount of research requested on different occasions. At the time of this study the mounted delay in processing judicial and police orders for chemical expertise in RIR was already two years.

Due to their low cost, the final price of NPS is much lower and thus more affordable for the people who use them, while the criminal groups who operate make much higher profits because of the larger turnover. For comparison of the black market at the moment (2018) in Sofia the average price of a marijuana cigarette is about 15 Lev, and the price of a cigarette with "herb" (mostly synthetic cannabinoid) is about 1-2 Lev. "The herb" is one of the most serious common NPS in Bulgaria and it is some kind of foliage that serves as a basis to which synthetic cannabinoids are added. One "herb" cigarette is sufficient for several (4-5) people, which again proves its potency. The use of the "herb" cannot be detected with standard urine or salivary tests, which makes it a preferred drug among young people and students. Among them is the belief that it is safe (because of the analogy of marijuana), it is also inexpensive and the use cannot be detected. All these basic "qualities" make it a drug of choice for many young people. The use of the NPS is concentrated mainly among ages 16 and 24 years, but other age groups may also be involved.

According to officers at the Directorate General for the Fight against Organized Crime, who were interviewed for the purpose of this research, Bulgaria is a destination country for NPS, rather than a

transit country, as in the case of heroin. (Annually across Bulgaria there are dozens of tons of heroin coming from Asian countries on their way to the huge market of EU countries. However, a very small amount of them remains in the country due to the small Bulgarian market.) This is determined by the fact that these substances travel most often by air, and Sofia Airport is not a large logistic center. Established consignments are distributed most often by couriers, and guarantors are either end users or smaller distribution groups.

The Department of Anti-drug trafficking at Customs airport Sofia began to discover dozens of cases of postal shipments, coming mainly from Spain (where the shipment arrives from Asia, transit) and China, which contain bath salts, flower fertilizers. According to the data of the Customs Agency, these are the substances have been detected: 4-methylmethcathinon (4-MS, mephedrone)-a chemical analogue of methicona; Metilendioksipirovaleron (MDPV)-a chemical analogue of a pyroaleron; Synthetic cannabinoids such as JWH-018, JWH-019, JWH-073, JWH-122 and JWH-250; 3.4-Methylenedioxy-N-Methylcathinone (BK-MDMA, Methylon), which have been packaged as ready-to-eat.

An indication that the country is becoming a hub for the secondary treatment of these substances and their repackaging, is the relatively larger shipments (from 6 to 10 kilograms) in the same year.

Meanwhile, a center was discovered in Sofia where the raw material, which is a plant mass, gets processed, and the finished product is then packaged for retail sale. The Customs Agency said that they stopped two large shipments from India in the same year (which is also one of the main producers of NPS) destined for a Latvia. The raid coincides with the advent of Nirvana shops in Sunny Beach, Sofia, and Bansko, which sell NPS and are owned by Latvian citizens.

The Customs Agency commented that during the first years of the emergence of the NPS in Bulgaria the country has become something of a transit hub, during which the processed production has

been forwarded to other countries-for example, Turkey. An employee of the CDCOC, interviewed for the purpose of this study, says that in the present case a parcel from China arrived by air, whose recipient was a Turkish student who had transferred the processed substance to Turkey through a family of Bulgarian Turks.

"In recent years, we have not received information about Bulgarian drivers having been captured on entry into Turkey with NPS", says an official who requested anonymity.

Another example of the practice in the period 2010-2012 is related to the substance gamma-butyrolactone (GBL), which was imported as wholesale from Germany into Bulgaria, repackaged in smaller doses and sold online. GBL is a substance that is not prohibited, but its sale is under control in a number of countries in Western Europe, as it is used as an alternative to GHB, which is placed under more serious control.

Along with the ' legal highs ' and ' lab chemicals' markets, there are also a number of products containing NPS that are sold disguised as ' food additives. These products are not aimed at people who are users of entertainment, but rather those who want to improve their appearance and mental activity. In this way, the NPS reach new user groups. One such substance, detected for the first time in Europe in 2014, is Adrefinil – a derivative of the drug modafinil. Adrefinel is sold as a "nootropic" supplement with the prospect of increasing energy and improving concentration and memory. Similar substances are also sold as auxiliary means for weight loss, reduction of appetite and increased energy.

New psychoactive substances can emerge in the illegal market following the diversion of legal drugs. In recent years, NPS have gained significance due to the misuse of prescription drugs in the EU and increasing illicit imports of medicine from outside the EU.

DISTRIBUTION

NPS have many advantages in terms of distribution: because their potency is higher, which eases their traffic. Hundreds of thousands of single doses can be trafficked in very low quantities. They are undetectable by standard field testing. In order to prove that these are illegal substances, they must be examined in licensed laboratories and with specific reagents that are often not available in systems operating on the ground.

One licensed laboratory for checking the content of NPS in Bulgaria is located in the Research Institute of Forensic of the Ministry of Interior.

The other laboratory is located at the Customs Agency. However, its capacity is extremely inadequate for the preparation of chemical testing, the director of the Institute, Dobrinka Markova said for the purpose of this study. The head of the sector, Lilyana Spasova added that in 2006, a working group on the development of the early warning system was set up at the National Focal Point for Drugs and Drug Addiction. The Research Institute of Forensic and Criminology is also a member of this group. The 2006-2009 the institute reports refer mainly to Chlorophenyl-piperazine and bromine-2.5-dimethoxy-phenethylamine (2-ST) substances, as well as their combination with amphetamine or 3.4-methylenedixymetethamine (MDMA). During this period, 5-methoxy-dimethyltryptamine (5-MeO-DMT) was also discovered. Since 2010, NPS appear from the genus of cationic, rare pyrolysates, phenethylamines and synthetic cannabinoids (SPICE). In 2010-2011, the substances of the group of the cations were predominant and, as of 2012, the synthetic cannabinoids were more numerous.

The forensic institute uses a gas infrared spectrometer for comparing different substances. The equipment shows how much the substance is similar and what is approximate, because often these

substances are mixed with not only one, very often mixed in two or three substances. “We have seen ordinary marijuana with added synthetic drugs, but this is rather an exception”, says expert Liliana Spasova. The plant base can be any, the most commonly the base would be chamomile tea, sage. “We have come across expertise and we have identified several sacks of chamomile tea in packages that have not yet been impregnated with synthetics, but have been seized as tangible evidence.

According to expert Spasova initially, the amount of synthetic substances was much greater on the plant base before, while in In recent years the concentration has definitely decreased. The conclusion is that distributors have apparently noticed that many young people have ended up in toxicologists. Due to the high number of victims, they must have decided to reduce the substance, which only confirms the above conclusion that NPS are not tested in advance for the effects they have on the human body.

“[Manufacturers] very often just change the species, change one function group, one link in the molecule and get another substance, having a similar effect, but often the resulting substance can be much stronger”, says expert Liliana Spasova. In her view, the production of NPS at home, the quantities of the active component, the plant mass and the corresponding solvents are not the same as for the typical laboratories for the production of synthetic drugs.

She shared that very often the substances that are found are not on the ban list, but in the law uses also the term “analogue “. So, the laboratory looks for chemical similarities between the substances that are under control, and the newly discovered to see if they are similar. Then the toxicologist would report about the impact of the newly found substance and if it meets the criteria of being an analogue to an illicit substance. Information is then submitted to the Minister for Health and to the Centre for Addictions responsible for the connection to the European early warning system.

Year	Number of experts at the NIFC:
2009	65
2010	17
2011	47
2012	38
2013	56
2014	69
2015	75
2016	102
2017	54
2018	108
TOTAL:	**566**

The main advantage in the supply of NPS is their final price, which is much lower, which makes for a higher profit. The common perception is that people distributing NPS are different from those who distribute traditional drugs because of easier production, easier sourcing and more modern ways of distributing over the Internet and different apps. But this division existed only in the first years- from 2010 to 2014 - from the entry of the NPS to Bulgaria, when they were not so familiar.

Subsequently, their distribution entered the world of organized criminal groups dealing with narcotic drugs. Criminal organization quickly saw the profit potential of NPS. An employee of the Ministry of Interior, who was interviewed for the purpose of this investigation, commented that more and more dealers of traditional narcotic substances also offer NPS.

This information is also confirmed in the analysis of the case studies in Bulgaria. It shows that the perception that the NPS distributors are different from the organized crime groups is not quite accurate,

because NPS are found in shares of the police and against structures of organized crime groups along with classic drugs.

Although a traditional producer of synthetic drugs, the production of NPS in Bulgaria seems more of an isolated phenomenon. In 2013 the police in Razgrad detained two chemistry teachers who had built a mining laboratory for the production of amphetamines, and in the process, they managed to synthesize synthetic cannabinoids. However, this finding may not be entirely correct because of the possibilities for the production of the NPS at home.

Proliferation of NPS has long been mixed with that of traditional drugs. Synthetic cannabinoids are obviously popular in prisons because of the aforementioned effects. In February 2017, an overseer found in a convicted total of 54 paper panties in which there were two types of synthetic cannabinoids. How these substances were imprisoned, the investigation does not establish, but merely acknowledges that this has occurred from a ‘ non-established person ‘.

Confirmation of this trend is also observed by the court rulings in Bulgaria that the NPS are often mixed with traditional narcotic substances. A number of legal acts show that consumers themselves, as their explanations to law enforcement authorities are not binding, are not always aware of what the substance they consume is. In some cases, they say they bought a “smoking tea”, and subsequently turned out to be marijuana, in others it was the opposite.

In witnesses’ testimonies of clients of accused in possession reported that they had bought marijuana, and tetsing proved that it was MDMB-CHMICA. There are no isolated cases in which synthetic cannabinoids are treated with marijuana. In one case, Methylon is found in a tablet that is tabletdized as an ecstasy.

These practices also signaled a police officer from the detention center, whom we interviewed for the purpose of the investigation. He revealed that the entry on the market of varieties with a high tetrahydrocannabinol (THC) content has born the practice of weaker

varieties and those viewed outdoors to be treated with synthetic cannabinoids. The MOI officer expressed concern that the capacity for a full examination of the seized substances is severely limited, which reduces the possibilities for tracking trends.

But this does not mean that the supply of NPS is controlled only by organized crime groups. On the contrary, because of the peculiarities of production and trafficking of “designer drugs” there is a parallel network of distribution from the so-called. “Shanadees” (individual players who have their own clientele are independent from traditional channels of conventional drugs and because of the many possibilities of supply/production of the NPS can hardly be associated with organized crime groups) . In the spread of traditional drugs-heroin, cocaine, cannabis, there is a very clear knowledge of where deliveries, channels and players come from this market. Therefore, the emergence of each new entrant is noticeable very quickly and is therefore quickly neutralized or subordinate. While the NPS, this is almost impossible. This, in turn, also leads to concern over the above-mentioned reasons - the unknown content and effects that affect the health of “designer drugs”.

PREVALENCE OF USE AMONG BULGARIAN STUDENTS

In 2016, the National Focal Point for Drugs and Drug Addiction conducted studies on attitudes and uses of psychoactive substances among students from 9-12 grade in schools on the territory of 12 cities (Blagoevgrad, Vidin, Vratsa, Gabrovo, Kyustendil, Pazardzhik, Pernik, Pleven, Plovdiv, Smolyan, Sofia and Shumen).

With regard to the use of new psychoactive substances, during life, the smallest number of students used these substances in the cities of Blagoevgrad, Vidin and Smolyan (2.6%), and the highest number in Sofia (11%).

With regard to the use of NPS in the last 30 days, the smallest number of students indicated that they had used them in the city. Smolyan (0.9%) and the highest number in the City of Sofia (3.7%).

Analysis of judicial cases on different types of NPS shows some regional concentration. For example, the most cases brought to court for MDMB-CHMICA and AB-CHMINACA have been in Shumen (11 of 45 cases), Dimitrovgrad and Haskovo (8 of 45 cases), followed by Razgrad, Pazardzhik, Panagyurishte, Sliven, Stara Zagora and Plovdiv. An official of the Ministry of Interior, who was interviewed for the purpose of this investigation, commented that the concentration of cases in Shumen in the last two years was due to the high social sensitivity resulting from the death of a 16-year-old girl in the beginning of 2016.

The concentration of cases in Dimitrovgrad can be explained by a network, discovered in 2015-2016. Then the substance (MDMB-CHMICA) was imported by courier from Great Britain and was discharged. 1:10 and distributed online, presented as a tea for smoking.

THE PURSUIT OF SUPPLY

The three pillars of the UNODC work program for the pursuit of supply are:

- Field-based technical cooperation projects to enhance the capacity of Member States to counteract illicit drugs, crime and terrorism
- Research and analytical work to increase knowledge and understanding of drugs and crime issues and expand the evidence base for policy and operational decisions
- Normative work to assist States in the ratification and implementation of the relevant international treaties, the development of domestic legislation on drugs, crime and terrorism, and the provision of secretariat and substantive services to the treaty-based and governing bodies.[1]

The system for control of NPS in Bulgaria is concentrated mainly in two institutions: the Customs Agency, which control the import of substances and their research, and the Directorate for Combating Organized Crime (CDCOC), which deal with the detection and The distribution, repackaging and production of NPS.

Apart from this the narcotics sectors of the Ministry of Interior Regional Directorates also deal with NPS, but they are particularly responsible for smaller quantities.

The clash of Bulgarian law enforcement institutions with NPS became more frequent in the first half of 2010 when individual EU member states such as the UK and Romania began to introduce control over certain groups of substances, which at that time were sold freely on the market. Putting these substances under control

1 https://www.unodc.org/unodc/en/about-unodc/index.html?ref=menutop

triggers migration of those involved in this type of trade to other EU countries.

Since the drug authorities are increasingly confronted with NPS, Bulgaria has been able to adapt its legislation in 2010. First in 2011 a new list was adopted to the Control of Narcotic Drugs and Precursors Act, which included new substances.

The shipments caught by the customs agency are growing, with the most crossed import attempts in 2013-27 (which marks a 42% growth compared to the previous year). A decline followed, and the trend in recent years has been to catch small consignments. This could mean two things – either the production of NPS inside the country has increased, or the customs authorities ' work has deteriorated. Because, as evidenced by the reference of the forensic institute at the Ministry of Interior (see above), the requests for expertise from 2013 to 2018 for NPS almost doubled. The conclusion is therefore that domestic production has increased at least twice.

WHAT BULGARIAN STATISTICS REVEAL

In 2016, synthetic cannabinoids were the most common new psychoactive substances in Bulgaria in terms of number of seizures and quantities seized – 124 individual identification cases (96.9%). The largest quantity of identified synthetic cannabinoid in Bulgaria for the period is the substance 5F-MDMB-PINACA. MDMB-CHMICA is the most commonly identified synthetic cannabinoid – 81 cases.

According to data from the national representative survey on attitudes and uses of psychoactive substances among the general population in Bulgaria (aged 15-64), 1.1% of respondents have used at least once in their lives a NPS (between 37 030 and 64 802 people). The use of the NPS in the last 12 months reported 0.4% of respondents (0.5% of men; 0.3% of women).

In the 15-34 age group, the prevalence of the use of NPS in the last year was 1.1% (1.3% of men and 0.9% of women). With regard to the use of the NPS in the last 30 days (in October 2018), only 0.1% of the people aged 15-64 (and only men) report the existence of a NPS. Last month use in the young population (aged 15-34) was also 0.1%.

In June of 2018 in Burgas uring a discussion on “Drugs: A risk for the future” an analysis was presented by the Ministry of Interior - Burgas, which states that in 2017 a total of 536 people were detained in the area between 16 and 43 years for possession of marijuana. -179 people were arrested for “Herbs” or happy tea and methamphetamines, 111 were detainees with amphetamines, 29 with ecstasy, 20 with cocaine, and 8 with heroin.

Table

CASES OF TRAFFICKED NPS, CAUGHT BY THE BULGARIAN CUSTOMS AGENCY 2010-2016

2010	
Mephedrone	14,140 kg
Butylon	0,172 kg and 3558 tablets
MDVP	5,118 kg and 300 tablets
Methyl	6 kg
Eckathinon	1,506 kg
TOTAL	**26,936 kg and 3858 tablets**

2011	
Mephedrone	6,203 kg
4-MEC	2,777 kg
JWH-018	1,725 kg
MDPV	0,125 kg
Fluoro-mecatinone	1,154 kg
MDPBP	137 tablets
AM-2201	0,567 kg
JWH-250	0,675
Methyl	1,010 kg
5-MEO-DALT	0,006 kg
Nafiron	2 kg
Eckathinon	0,005 kg
TOTAL	**16,247 kg and 137 tablets**

2012	
MDPV	0,024 kg
Salvinorin A	0,250 kg
JWH-081	0,210 kg
GBL	65 l

Other synthetics*	5,457 kg
TOTAL	**5,941 kg and 65 l**
** 2-phenylethylamine; 5-APB, a chemical analogue of MDA; pentahedron*	

2013	
AM-2201	77 kg
APINACA	11,500 kg
Methyl	0,029 kg
UR-144	1 kg
STS-135	0,006 kg
4-MEC	0,005 kg
Other synthetics*	1,103 kg and 7 tablets
TOTAL	**90,643 and 7 tablets**
** 3,4-DMMC; 6-APB; 5F-AKB-48; AB-Pinaca*	

2014	
UR-144	2,806 kg
JWH-122	1,015 kg
Salvinorin A	0,025 kg
AM-2201	0,002 KG
TOTAL	**3,848 KG**

2015	
AM-2201	0,5 kg
TOTAL	**0,5 kg**

2016	
5F-AKB-48	0,053 kg
MDMB-CHMICA	0,270 kg
AB-CHMINACA	0,037 kg
CUMYL-5F-PINACA	0,018 kg

MDMB-CHMCZCA	0,008 kg
Ethylphenidate	0,065 kg
XLR11 (UR-144)	0,014 kg
3-MMC (4-MEC)	0,002 kg
TOTAL	0,467 kg
TOTAL	**0,467 kg**

HEALTH ASPECTS, RISK GROUPS AND PREVENTION

Physicians define the symptoms for the effects of the use of NPS such as: fast heartbeat, increased salivation, psychomotor agitation, undue aggression. These are the main symptoms of abuse of such a substance.

The head of the Toxicology Chemical Laboratory at the Clinic of Emergency toxicology of MMA Assoc. Prof. Vassil Atanasov determines the profile of the users of the NPS as “relatively young users who want to try new things”. His impression, based on the research made by the laboratory he directs, is that NPS are not popular.

In addition to the risks previously mentioned, related to limited or unavailable information on the substances that the applicant has accepted, there is another risk aspect of indirect use. A frequent result of NPS use is increased sexual desire, which in some cases becomes a risky sexual behavior, sex without protection and infection with sexually transmitted diseases. Particularly risky is the so-called Khem Sex (chemsex). Use of drugs in a sexual context, which often connect completely unknown people and practice this behavior for long periods of time.

As the most massive NPS Prof. Atanassov points to synthetic cannabinoids. According to him they are the most prevalent, but as Prof. Atanassov marijuana with heightened potency, which can reach up to 40% THC content, to be just as dangerous. Years ago, the potency of marijuana in Bulgaria was about 2-4%.

The process of preparation of synthetic marijuana Prof. Atanassov describes so: “The powdered substance is applied by spraying and with the help of acetone on a foliage-tea or herbs.” The big problem according to the expert is that nobody knows how and who prepares the substance, which creates a serious problem and probability of

acute intoxication. (A similar technology describes the expert from the forensic institute ay the Ministry of Interior, Lilyana Spasova, see above.)

According to Prof. Atanassov there has been one confirmed death after the use of synthetic cannabinoid in Bulgaria: in Vratsa in 2017. In addition to the large dose in the body, a residue of the consumed substance was found during autopsy, which helped to determine that synthetic cannabinoid was the cause of death. “There are a number of other cases that are suspected, but not confirmed”, explained Prof. Atanassov.

Prof. Atanassov points out the lack of equipment as a serious problem in his laboratory. He gave an example with Cyprus, where brand new equipment has recently been purchased, which allows full screening of all narcotics from the NPS group. It is designed to detect and recognize new substances. The price of this appliance is 1.5 million leva. The cost per sample is around 300 leva. In parallel, there are the so-called ‘Libraries ‘ with reference substances. They are compiled by the information that different partner countries collect. Libraries with already known substances are updated every year and cost several thousand leva. The former head of the National Focal Point, Momtchil Vassilev said that in 2017-2018, while he was still held the management post, he tried to buy the library, but to no avail because of bureaucratic obstacles related to how the the center gets financing.

For Prof. Atanassov no less problem is the shortage of experts. There are no more than three-four forensic toxicologists working in his lab, while the amount of work is piling. This lab is used for 90% of the testing, ordered the courts when processing cases. “We are talking about samples for DUY cases, autopsy samples and overdoses and toxicology patients, etc.,”. He said that it is not uncommon for cases in which, despite their high workload, they receive letters from the prosecution, which oblige them to give written explanations of why they have slowed down the results.

The shortage of personnel and equipment is also indicated by the director of the forensic institute at the Ministry of Interior, Dobrinka Markova. The institute is the only laboratory that investigates synthetic drugs. The main problem arises precisely from the huge volume of work that goes there. It also increases the period for which the testing is done. In addition, each year the cases increase by 50%. The institute has begun lagging behind back in 2015. Then it failed to process all the samples for the year and transferred 50% for 2016, in 2017 he transferred another 50% and so the process is scrolling and accumulates. At the time of the interview for the purposes of this report, the delay is for a period had increased to a year.

In other words, at the moment (2019), the institute is processing samples from January 2018. One of the main problems are the express expertise, which are processed to order the NSBOP. This further recedes the processing of the others. Apart from this, chemical drug analysis staff has other training assignments for their colleagues from regional laboratories.

In the history of the Institute, such a lagging of processing samples has happened several times and it has been solved only by increasing capacity. 10 regional base-scientific laboratories in the country are created to deal with narcotic drugs. But then the drugs that were used were basically traditional drugs. So far these labs have been able to provide expertise only for these substances. Today almost all narcotic substances that come into the institute are synthetics and NPS. In Bulgaria there is no other place to examine these substances.

For Dobrinka Markova the problem with the accumulation of expertise for NPS can be overcome by opening five new laboratories, mainly in the five major cities-Sofia, Plovdiv, Bourgas, Varna and Pleven.

Targeted action by all relevant authorities is needed and the creation of an integrated database on the emergence and use of the

NPS, as well as an adequate information campaign for this, especially in the adolescent community.

The content of this database should also include information on the drug markets, such as the places where they are offered, dealer profiles and analysis for informed decision-making by the NPS. Potential effective interventions to reduce harm from the use of NPS may be related to the provision of information on less dangerous uses.

The existing legislative framework does not distinguish between the various narcotic substances in terms of the predicted punishment and NPS is pursued on a par with traditional narcotic substances. The Bulgarian legislation lacks a definition of NPS.

Drug possession for personal use is considered a minor offence and in the first one is punished by administrative order, a fine of one thousand to five thousand leva, and in case of repeated infringement leads to criminal condemnation, which again is a fine of up to one thousand leva, but the person is kept been convicted.

Where the production, processing, acquisition or possession of narcotic drugs is for distribution, a penalty of one to six years of imprisonment is provided for, and when drugs are in large amounts, the penalty is 3 to 12 years Prison.

The statistics on registered crime produced by the MOI do not support a breakdown between the different categories of enforcement activities by bringing them together in a general category of ‘ drug-related offences ‘.

An employee in the Ministry of Interior, working in the capital’s DEPARTMENT of public order, commented for the purpose of this study that the prosecution of this type of crimes depends entirely on the policy of the central management of the Ministry. “After the alcohol (bell). Line. -driving a car after using alcohol) getting people with drugs is the easiest and fast-moving “, commented the interviewee.

The motives for such a policy can be explained by the desire to demonstrate a “hard” approach to drugs, but also have a very pragmatic aim. Drug-related offences have one of the highest detection rates, which helps to raise the number of all crimes discovered.

A lawyer specializing in drug cases says that police forces from the security police deliberately prosecute persons who enter the profile of drug users. The checks are often carried out at the edge of the law, and the examiners do not explain the rights that turn this activity into a serious source of corruption. In front of the persons captured even with a minimum amount of narcotic substance, the alternative is to be detained for 24 hours, criminal registered or to enter a corrupt deal.

From the official announcements of the Ministry of Interior, but even from the reporting reports of the regional directorates of the police it is evident that the law enforcement institutions themselves at the local level are not quite aware of the differentiation of NPS, which are very often reported as “synthetic Drugs ‘.

In a conversation for the purposes of this study, a police officer at a management post in the Department of Drug countermeasures shared the lack of expert capacity in the study of intercepted substances.

The case-Law on NPS cases, which was reviewed for the purpose of this study, shows that in determining the sentence the courts observe exactly the same approach as in classical narcotic drugs. Most of these cases end with an agreement.

It is evident from the court’s rulings that the majority of these cases are for the possession of NPS, with a few cases of spread.

A management officer in a Department for Drug countermeasures said that the state has no complex approach to drug users and treats them only as offenders, to which the state’s only concern is criminal repression.

The relationship between the various units relevant to these issues exists pro forma but is not applied in practice.

CONCLUSION

The exchange of information between toxicological laboratories, medical institutions, users ' organizations and outreach teams can increase the knowledge about NPS and reduce overdose cases, expert say.

The rapidly changing social and economic climate, coupled with increased availability and promotion of drugs and their demand, have contributed to the growing scale of the problem of drug abuse globally. The complexity of the problem is compounded by changing patterns of drug abuse, supply and distribution. There has been an increase in the social and economic factors that make people (especially youth) more vulnerable and likely to be involved in drug use and drug risk-taking behavior. Therefore, in order to tackle this problem effectively, drug demand reduction policies and programs must be specifically designed to cover all sectors of society as a whole.

The most effective way to tackle the problem of drugs involves a holistic, balanced and coordinated approach that addresses both supply control and demand reduction, which strengthens one another, and the proper implementation of Principle of shared responsibility.

Governments, international organizations and non-governmental organizations are making significant efforts to suppress illicit manufacturing, trafficking and drug distribution. Drug demand reduction programs need to be integrated in order to: Foster cooperation among key actors; Include a wide variety of appropriate interventions; Promoting health and social wellbeing among individuals, families and communities; and to reduce the adverse effects of drug abuse on the individual and society as a whole."

Regarding policies and specific legislation, most reports and programs that affect drug reduction and counter-narcotics policies do not address "designer drugs" or NPS. In the media, there are pe-

riodically patchy information about them after a death or sporadic warnings from police. Due to the flexible avoidance of the legislation of the various countries by manufacturers and distributors of this type of drug, urgent measures are required to create effective policies to respond to the proliferation of NPS.

Despite Bulgaria's participation in the system for exchange of information on cases of seizure of precursors and other substances, which are found to be used in illegal drug production, there is a downward scale of captured amounts of NPS, while the requests for test to the forensic institute at the Ministry of Interior for a period of 5 years have doubled.

Three main problems to counteract the demand, supply and treatment of dependencies with NPS can be defined from the above statement:

- The production and distribution structure of the NPS makes it very difficult to identify producers and distributors;
- The difficult identification of the type of active substances used is an additional problem and the small capacity of the laboratories, equipped to deal with NPS adds to it;
- The lack of information on NPS make it difficult for medical teams to react in cases of overdose, which makes the risk of death is significantly higher.

The main problem is that drug policy including regarding NPS is done entirely in the dark. All the chain-police, users, are busy with prevention or are deprived of information, or coordination and communication between them is compromised, which in turn makes them ineffective. Another problem is that information is available, but – this is especially the case for emergency assistance – is practically inaccessible for the short term in which it is needed to be useful. It is precisely the better coordination and active and open participation of all stakeholders that should be the main guidance in

policy-making for the prevention of the use of NPS, as well as how to implement them.

The solution and development of these policies are extremely dependent on the information on the NPS. For this reason, it is very important to have an established approach to the emergence and content of NPS. Despite the Early Warning System, which was introduced in the European Union, Bulgaria is lagging behind the actions of the other countries.

In the first place an adequate information campaign is needed-the publications on the topic NPS.

According to Attorney of Law Kalin Angelov, member of the Movement Change, which advocates for decriminalization of marijuana and other drug policy reforms in Bulgaria, “Today, after having nearly 2000 pages of public information on the subject on the record, revealed by my requests, I am convinced more than ever that the drug policies are rooted in organized criminal groups, protected by the state, the constant and the progressive violation of citizen and human rights.” According to him, NPS prevention policies suffer from the same incapacities as those for conventional drugs. There is a total lack of awareness and an adequate response by the state, despite the proclaimed activities and the work of many organizations. In his opinion, the lack of an integrated information system and knowledge of the composition and impact of NPS hinder the building of durable and effective prevention policies.

Another reason why the creation of effective policies is blocked is that both the prevalence and the mode of use and the effects of the NPS differ significantly from those of known narcotic drugs such as marijuana, heroin and cocaine. This is why focusing on the information provision of preventive action is crucial to resolving the problem of NPS.

Prevention policies should prevent the use of NPS and the problems arising therefrom, while drug treatment involving both psychological

and pharmacological methods is the main measure in the making of Informed choice in the use of the NPS.