

1 Small Arms Distribution Survey (SADS)

1.1 Legal SALW

1.1.1 Civilian weapons

According to the Control of Hazardous Devices Office (CHDO), a unit within the National Police Service (NPS), which maintains records of all registered civilian weapons on behalf of the Ministry of Interior (Mol), as of 31 December 2003, there were 305,624 weapons in the hands of 249,882 private citizens across Bulgaria. Although this puts Bulgaria roughly on a par with other Central and Eastern European countries in terms of per capita ownership, the current levels of civilian armament are comparatively new. Until 1991, civilian possession of firearms was limited to hunters and sportsmen under a highly restrictive domestic arms control system dating from the Communist period. During that time, many weapon owners were actually privileged party members (especially those honoured as 'Active Fighters Against Fascism and Capitalism'), or senior Ministry of Defence (MoD), or Mol officials. The most common weapons among civilians at that time were hunting rifles and almost all of those were legal. Illegal firearms were generally rifles, pistols, revolvers, and assault rifles left over from the First and Second World Wars.³

With the passing of Communism the country has gradually liberalised its system for civilian weapons possession, allowing certain categories of civilians, including private security guards, to possess and carry weapons. Figure 1 below charts the gradual rise in the number of weapons in circulation from 1991 onwards. The first notable increase in the number of registered weapons occurred in 1992 when the government passed a decree requiring the re-registration of all civilian weapons.⁴ As the graph below shows, some 100,000 weapons were registered following the decree. In 1994 this process of collection and re-registration was repeated.

At this point in time the domestic legal market for small arms was still developing and it was common practice for the Mol to rent out weapons to civilians. For the staff of Private Security Companies (PSCs), and others who could prove the need, 9 mm Makarov pistols were on offer from the police; 7.62 mm Kalashnikovs were also rented to security firms to protect buildings outside populated areas.⁵

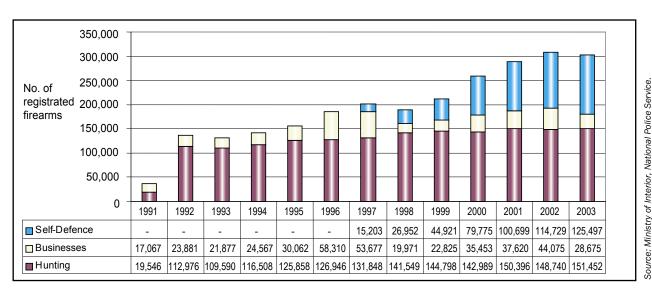


Figure 1: Number of registered firearms in Bulgaria.

³ Interview, Chervenkov, 21 July 2004.

⁴ The Decree also required all government institutions to provide an exact account of the firearms in their possession. Decision No. 167 of the Council of Ministers for Re-registration of Firearms, used by Legal Entities and Private Individuals, from 4 May 1992.

⁵ Order No. 15 of the Mol, 25 February 1997.



At the end of 1996, amendments to the law which then governed domestic firearms possession, the *Regulation* of the Law on Explosive Substances, Arms and Ammunition, allowed private individuals to obtain firearms for protection of their business or for work in private security firms.⁶ This law was eventually repealed altogether and a new Law on the Control of Explosive Substances, Firearms and Ammunition (LCESFA), allowing firearm possession for self-defence for the first time, was introduced in November 1998.⁷ Following the new law, the number of registered civilian weapons increased for several years, only beginning to tail off in 2002. Interviewees from the CHDO explained the rise by pointing to the extreme political tension in the country around this time, which heightened the public's sense of insecurity. They also noted that in response to growing insecurity, PSCs became more and more popular, probably further increasing the demand for civilian self-defence weapons since PSCs rely heavily on staff who already own their own weapon.⁸ Despite the fairly rapid increase in registered weapons possession over this period, Figure 2 shows that, at 3.9 weapons per 100 persons, Bulgaria's current level of civilian possession is close to that of the newer EU states, and below the EU average of 11 weapons per 100.

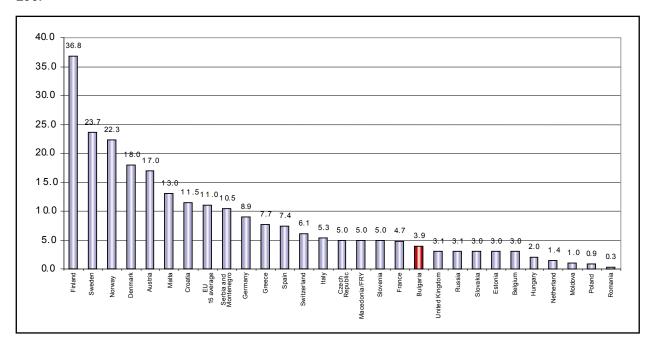


Figure 2: Registered firearms per one hundred people.9

A request by the research team to the MoI for a breakdown of legally registered civilian weapons by type was refused. ¹⁰ Nevertheless one can assume that the great majority of the 145,816¹¹ civilian-owned hand guns are Makarov pistols, firstly because the great majority of owners (former military and police staff) were allowed to purchase them at preferential prices and secondly because Makarovs are comparatively cheap. Interviews with a number of gun-shop owners show that Glock, CZ, Beretta, Browning, Walther, Smith & Wesson, and Colt are the brands of hand-guns that are in the highest demand.

Records provided by the CHDO provide a picture of how the country's total number of registered weapons are distributed among various actors.

⁶ Amendments to the Regulation of the Law on Control of Explosives, Firearms, and Ammunition, *State Gazette* number 79, 17 September 1996

⁷ LCESFA, State Gazette number 133, 11 November 1998. A subsequent regulation on the law's implementation was introduced in September 1999.

⁸ As permitted by Article 14.4 of the LCESFA. The practice is legal provided records of the weapons in use are kept at the site being guarded. Interview with CHDO official, 27 October 2003.

⁹ Source: Calculations for Bulgaria are based on data from the Ministry of Interior, National Police Service. Data for other countries is taken from Small Arms Survey (SAS), 2003, pp 64–65.

¹⁰ Unofficially, it was explained that this information would constitute a 'marketing study'. Interview, Gaidarski, 02 August, 2004.

¹¹ This figure is the total number of hand guns registered to civilians, private companies and former Mol/MoD personnel.



OWNERS BY TYPE	NUMBER OF PERMITS ISSUED
Hunters	108,704
Former/current MoD/MoI	64,002
Private individuals	57,625
Businesses	18,975
Members of sports organisations	252
Collectors (private individuals)	217
Collectors (companies/sole proprietors)	59
Sports organisations	48
Total	249,882

Table 1: Registered weapon owners by type of permit (2003).12

WEAPONS BY TYPE	TOTAL NUMBER OF WEAPONS REGISTERED
Hand guns for self-protection	145,816
Smooth-bore hunting rifles	137,732
Smooth-bore under 510 mm	3,162
Rifled hunting rifles	17,441
Sports/award/collectors' weapons	12,428
Civilian subtotal	316,579

Table 2: Registered civilian weapons by type (2003).13

Hunters are the largest single civilian group holding weapons in Bulgaria. Even before 1989 their number was already in the tens of thousands. By the end of 1992, Bulgaria's private individuals had registered 112,976 hunting weapons. In the following five years, the number of hunting weapons remained relatively stable. By the end of 2003 the CHDO had registered 108,704 hunters who possessed 151,452 hunting weapons. Since under the current law each hunter may own an unlimited number of hunting rifles and up to 50 rounds of ammunition per rifle (or 200 rounds per smooth-bore rifle), there is plenty of scope for the number of legal hunting rifles in the country to increase in coming years.¹⁴

After hunters, the bulk of private citizens possessing firearms – 64,002 individuals – are actually current and former employees at the MoD and MoI, of whom a substantial number are military officers. ¹⁵ Fifty-three percent of civilian gun owners fall into this group, possessing 64,079 weapons between them (some have more than one weapon). In addition, there are 57,625 ordinary citizens who possess 61,418 firearms (including 1,133 award ¹⁶ and 249 sports weapons). The higher level of ownership by those connected with the MoD or MoI is probably accounted for by the permit system, which makes it easier and cheaper for current and former employees to

¹² Source: Mol, NPS.

¹³ Source: Mol, NPS.

¹⁴ Regulation on the LCESFA, Article 57.1.

¹⁵ Because the current permit system designates a single category for both former and current military and police personnel, there is obviously some overlap in the statistics between current Mol/MoD employees and true civilians.

¹⁶ Award weapons are usually given by government agencies to individuals, most often MoI or MoD officers in recognition of their service.



obtain a licence. Most former police or military personnel own 9 mm Makarovs, since they were allowed to purchase them from stocks, or to purchase their own professional firearm upon retirement.

A separate category of civilian owners are legal entities such as sole proprietors and companies. Statistics from December 2003 showed that there were 28,675 firearms licensed to businesses or sole proprietors for the protection of their company. A sizeable minority of these companies provide security services, the private security business having grown rapidly over the past decade. In 2004 there were approximately 3,000 PSCs in Bulgaria employing close to 130,000 security guards. According to a Mol statement, personnel employed by PSCs are together in possession of around 90,000 firearms. Although no in-depth research has been carried out so far in Bulgaria on the conduct of these companies, it seems that the bulk of private security guards are using weapons registered for their personal use during their work. This practice is entirely legal and does not require a change of registration. Since many of them are former and current police and army officers, it is reasonable to assume that most PSC personnel are using 9 mm Makarovs.

Bulgaria's gun shops and shooting ranges also hold significant weapon inventories. In 2004 there were 269 registered gun shops and 67 shooting ranges in the country. Estimates of the weapons held in stock at gun shops and shooting ranges must take into account the fact that such establishments range in size from the two-floor luxurious *VIP Trading* gun shop in Sofia, which stocks hundreds of different firearms, to gun shops in small towns with only a few dozen weapons.



Photo 1: Center for the Study of Democracy researcher Philip Gounev tries out the hardware at a shooting range, September 2004.



Photo 2: VIP Trading gun shop in Sofia, one of the bestequipped retail outlets in the country.

Nevertheless, a conservative estimate would be that each gun shop has an average of 150 small arms in stock, giving a countrywide total of 40,350. Allowing for 30 weapons per shooting range would mean that there are an additional 2,070 firearms nationwide.²⁰

Finally, in addition to the above-mentioned groups, CHDO records show that there are about 8,000 weapons owned by 59 private collectors, and some 2,300 weapons owned by sports clubs and athletes.²¹

 $^{^{17}}$ MoI, 05 August, 2004, http://press.mvr.bg/News/news040805_01.htm, accessed 10 August 2004.

¹⁸ Mol data quoted in *Cash*, 2004. The Mol agency to which PSCs periodically report on their staffing levels and weapon holdings is known as the Security Police.

¹⁹ Mol data.

²⁰ The calculation is based on information given by staff at a number of different shooting ranges in Sofia visited by the research team during September 2004.

²¹ CHDO data, Mol.



1.1.1.1 Geographical distribution

The distribution of registered weapons across the country closely follows the distribution of the population, except in four regions. While Sofia and the region around it represents only 18 percent of the population, it holds 26 percent of all registered weapons. Sofia-city also has the highest rate of firearm ownership in the country (six per 100 people). Higher rates of possession are also evident in the regions of Khaskovo (bordering Turkey), Kyustendil (bordering Macedonia), and Lovech which have around five firearms per 100 people, significantly above the 3.8 average for the country.

There are several possible explanations for this disparity. Sofia has the biggest concentrations of business and government institutions, most of which are guarded by PSCs. This fact alone could be sufficient to explain the additional concentration of weapons – police data from 1999 (before private security companies started actively hiring guards with their own weapons), shows that 41 percent of all security guards were in Sofia. Since average incomes are higher in Sofia than elsewhere in the country (by about 26 percent higher than the national average according to National Statistics Institute (NSI) data for 2003), higher disposable incomes may conceivably be playing a role.²² Other factors are also at work however, and it is also important to remember that crime rates are higher in Sofia than elsewhere in the country, which may be driving civilian possession.

In the other three regions, more information is needed before the reasons for higher levels of ownership can be determined. An examination of weapon permit denials does not highlight any difference for these regions. The reported crime rate is also not markedly different in these areas, while the number of registered hunters does not appear exceptionally high either. Figure three below shows how levels of legal civilian firearms ownership have changed since 1999.

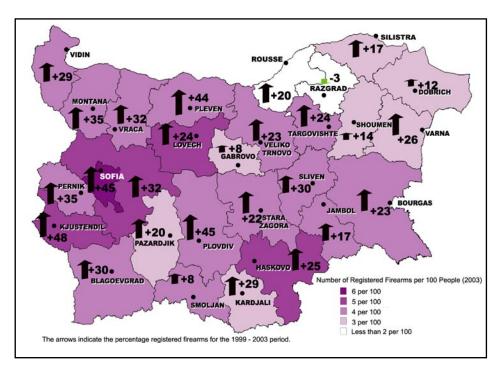


Figure 3: Firearms per one hundred people / percentage change in number of registered firearms for 1999–2003 period. 23

Note: The above map examines only the distribution of weapons among civilians and not that among government agencies or defence companies which tend to be stored at concentrated sites.

²² NSI, 2003, p15.

²³ Source: Mol, NPS.



1.1.1.2 Ethnic distribution

According to MoI records (see above map), regions with a predominantly ethnic Turk population, such as Kardjali and Razgrad, have some of the lowest density of firearms per head of population (three per 100 and two per 100 respectively). Recent history may explain this fact. During the 1980s a number of repressive measures were used against the Turkish minority by the government and thousands were expelled. Fearing retaliation, the security forces searched these areas, seizing all the weapons and ammunition that they could find. Consequently, by 1991 when people were allowed to register some weapons, few remained in these areas.

According to household survey (HHS) findings, while 6.8 percent of ethnic Bulgarians own firearms, this percentage is much lower for Turks and for Roma.²⁴

ETHNICITY	NUMBER OF RESPONDENTS	PERCENTAGE OF RESPONDENTS THAT OWN FIREARMS			
Bulgarian	1,065	6.8%			
Turk	91	1.1%			
Bulgarian-Muslim	25	0%			
Roma (Gypsy)	58	1.8%			
Other	9	0%			
No answer	3	0%			
Total	1,251	5.9%			

Table 3: Ethnic breakdown of self-declared firearm owners.

Another reason why most Turks do not have firearms may be that they tend to live in small towns and rural areas where crime levels are lower. Unfortunately the number of Roma participants captured in the HHS was too small to allow for statistically valid conclusions about the reasons for the particular geographical distribution of weapons among this group which is dispersed in city neighbourhoods and villages around the country. The survey registered no firearms within the Bulgarian-Muslim community (also known as 'Pomaks'). Although, it is statistically possible that within a small sample of 25 individuals there were no weapons, Bulgarian-Muslims certainly possess some arms. During a focus group discussion in Gotse Delchev, a town surrounded by a predominantly Muslim population, participants, who were all ethnic Bulgarians, claimed that most Pomaks households had weapons. In their opinion, this is because the Pomaks community fears repression, either from ethnic Bulgarians or the state. In addition, participants claimed that many Pomaks were hunters. Even discounting nationalist-inspired exaggeration, these claims point to some level of weapons possession among Pomaks.

1.1.2 Bulgarian Armed Forces

Information concerning the SALW holdings of the Bulgarian Armed Forces and the Ministry of Defence (MoD), is not publicly available.²⁶ Nevertheless, it is possible to estimate army and MoD SALW holdings using other publicly available information such as the number of personnel serving in the armed services.

²⁴ Bearing in mind the small size of the ethnic minority sample, these figures should be regarded as indicative rather than statistically significant.

²⁵ 78.5% of all Bulgarian firearm owners live in towns with a population greater than 5,000, but in keeping with the country-wide distribution of the ethnic Turkish community, 67 percent of Turkish HHS respondents were resident in communities with a population of less than 5,000.

²⁶ As an MoD official pointed out, members of foreign delegations from countries offering to fund SALW destruction will obviously gain an appreciation of available stocks when visiting stockpiles. Remarks by Yordan Bozhilov, International Organisations & Arms Control, Ministry of Defence at a seminar hosted by the Bulgarian Red Cross, 03 – 04 November 2004, Sofia.



As of 2004, the armed forces numbered 100,000, a figure which includes 55,000 reservists (see breakdown in Table 4). All active duty officers are assigned a hand gun, and ten percent of them also receive an assault rifle. A third of all junior officers are assigned an assault rifle, and the remaining two-thirds, hand guns. All soldiers in the lower ranks are assigned an assault rifle. Bulgaria's 55,000 reservists are assigned weapons in the same fashion. Since an extra 10 percent of weapons are held in reserve to compensate for routine damage, based on the figures above, the number of active service weapons held by the armed forces is calculated here as 116,468 units. Interviews with MoD officials though, suggest that there are also wartime reserves of about 180,000. Thus the total amount of working small arms – excluding those designated as surplus – can be estimated at around 300,000 units.²⁷

Current SALW surpluses are said to stand at around 200,000 units and can be expected to grow as the armed forces are further downsized in line with Bulgaria's agreements with the NATO.²⁸ The research team were unable to obtain further information as to the exact number and type of surplus weapons because the information was deemed classified.

While the condition of weapons designated as surplus may vary according to their previous history, a report by an international consultant who reviewed the condition of surplus MoD weapons during a destruction project sponsored by the United Nations Development Programme (UNDP), indicates that the remaining surplus weapons are in good condition.²⁹ So long as large stocks of serviceable weapons exist, the prospect of a lucrative sale on the international market always remains. In the past the Bulgarian Government has sought to export its surplus weapons whenever possible.³⁰ It should be noted though, that Bulgaria has entered into a political commitment to the Organization for Security and Co-operation in Europe's (OSCE), which emphasises that the destruction of surplus SALW is the preferred method of disposal.³¹

The country's total ammunition stock is currently in the order of 160,000 tons, of which 80,000 are earmarked for destruction under a national programme.³² Around 21,000 tons of this stock is surplus SALW ammunition (see Annex C).

1.1.3 National Police Service and Ministry of Interior

The National Police Service and other Mol agencies also hold a range of SALW. The exact number of police and other Mol personnel is classified, although numerous public statements by Mol officials have previously made reference to 60,000 personnel, including thousands employed in administrative positions.³³ The figures for weapons distribution among personnel vary somewhat (eg in one recent public statement the police force was said to be 27,000 - 30,000 strong, which would suggest police SALW stocks of a similar range, while a second statement³⁴ claimed that, '20,000 sergeants and officer staff possess most likely around 22,000 units of personal and professional firearms').³⁵ The difference between figures is probably accounted for by the employment of 7,000–10,000 administrative personnel. Each police officer is assigned a hand gun for routine duties, and

²⁷ Interviews with MoD officials confirm that this is a credible estimate, Sofia, 23 September, 2004.

²⁸ Interviews with MoD officials, 14 September, 2004.

²⁹ The consultant oversaw the destruction of 4,500 AK-74 rifles and assorted ammunition designated as surplus by the MoD and noted that the weapons selected for destruction by the MoD were in good condition. It seems reasonable to assume that the remaining surplus stocks are in a similar, if not better condition, since it would be unusual to destroy the best-kept weapons and retain ones of a lower quality. See Munro I, 'Ammunition Consultant After Action Report References: UNDP PROJECT BUL/02/H12/1X/34SSA no. 2003-005-POG'.

³⁰ "Money Talks, Arms Dealing with Human Rights Abusers", (Human Rights Watch, April 1999), Vol. 11, No. 4 (D).

³¹ OSCE Document on Small Arms and Light Weapons, (OSCE). Forum for Security Co-operation (2000), FSC.DOC/1/00 of 24 November 2000

³² From 30 November to 03 December 2004 an international delegation visited the CSTMB to assess the feasibility of a destruction project. MoD staff indicated to the joint SEESAC/JACIG team that up to 80,000 tons would be available for destruction. Interview, Wilkinson, 03 December 2004.

³³ Bulgarian National Television, 05 July 2004

³⁴ Bulgarian National Television, 05 July 2004; Bulgarian National Television, 20 May, 2002; and *Novinar*, 27 September 2003.

³⁵ Trud, 28 March 2003.



an assault rifle in case of special operations, martial law or war.³⁶ According to MoI interviewees, an extra ten percent of stocks of both weapon types are also kept in reserve.³⁷ This means that the NPS has at least 22,000 hand guns and 22,000 assault rifles (Kalashnikovs) at its disposal. Although the MoI also retains a number of weapons available for renting to individuals or companies, as well as a reserve of old or decommissioned weapons, the research team were unable to source any reliable information as to the numbers involved.

The police's reserve weapons are kept in warehouses maintained by the country's 188 district police departments. District police departments are also responsible for temporarily storing any weapons seized during the course of their work, whether from criminals, or from ordinary citizens whose permits have expired. These weapons tend to be stored for short periods at police stations before being moved after a longer period to warehouses. Alternatively, following their seizure, criminal proceedings may require particular weapons to be passed on to other agencies such as the courts or the Mol's Research Institute of Forensic Sciences and Criminology. Despite attempts to do so, the research team could not determine exactly how many seized weapons the NPS holds at this time. However, the number is probably quite low, because the Mol retains the right both to sell and destroy these weapons (the Mol-owned company BMW has a chain of gun shops and a trading licence). In September 2004, the Council of Ministers adopted a decree stipulating that on 1 January each year, the Mol's 'Material Technical Supplies' Directorate must present a full list of all surplus weapons and ammunition to the Minister of Interior. Under the new arrangements, once the Minister approves the list a special commission will set reserve prices for any weapons earmarked for sale.³⁸ In the most recently reported sale on 31 March 2004, the Mol sold off 705 weapons that had been confiscated by customs and Mol personnel.³⁹ It is assumed here that Mol holdings of this type are similar to the average annual seizure rate of 1,200.

In the course of security sector reforms begun in the late 1990s, those Mol agencies which had previously performed military-type duties, such as Gendarmerie and the National Border Police Service (NBPS), saw their inventory of weapons considerably reduced as they began to take on a purely policing role. As a result, a significant number of SALW, including military-style weapons such as heavy machine-guns, were removed from active service.

SALW holdings at other Mol agencies can be harder to estimate, since in some cases (eg National Security Service (NSS)) staffing levels are secret. The estimates in Table 4 are based on information gathered during key informant interviews and on researchers' observations. As suggested by Mol interviewees, the calculations also assume an extra ten percent reserve. The total SALW holdings of all Mol agencies is estimated in the below table as approximately 94,000 units.

1.1.4 Other government agencies

A number of other government agencies retain SALW stocks for their employees' use. They include: customs officers, forest rangers; prison guards; judicial police; building construction inspectors; Ministry of Agriculture inspectors; railway inspectors; and road vehicles inspectors. The main agencies' holdings are estimated in Table 4 below based on staff levels.

The National Protection Service, which is the agency responsible for the protection of the President, the Prime Ministers as well as other government, judicial, and legislative branch officials has a staff of around one thousand. Most of the staff are drivers who carry at least one hand gun. However, there are around two hundred bodyguards who have more than one hand-gun, including a range of automatic weapons.⁴⁰ The estimated number in the table assumes that every officer at this agency has at his disposal at least one hand-gun and one assault rifle or similar automatic-type weapon. An extra reserve of ten percent has again been factored in.

³⁶ Interview, MoI official, 06 October 2004.

³⁷ Ibid.

³⁸ The decree also stipulated new storage standards. *Trud*, 24 September 2004.

^{39 24} Chassa, 01 April 2004.

⁴⁰ Interview, former NPS officer, June 19, 2004.



	EST. PERSONNEL	EST. HAND GUNS	EST. ASSAULT RIFLES	EST. OTHERS (ASSORTED)	TOTAL
Military and Ministry of Defence			•		
Active duty officers	7,582	7,582	758		
Active duty junior officers	11,396	7,521	3,761		
Soldiers	23,221	2,322	23,221		
Reserve officers	9,882	9,882	988		
Reserve junior officers	14,853	9,803	4,901		
Reserve soldiers	30,265	3,027	30,265		
Other MoD officers	1,849	1,479	370		
Other MoD junior officers	924	610	305		
Sub-total		42,226	64,569		
Reserve weapons (10 percent)		4,162	6,426		
Army total		46,388	70,995		
Other wartime reserves				180,000	
Surpluses				200,000	
Army light weapons				6,713	
Military subtotal		46,388	70,995	386,713	504,096
Ministry of Interior					<u> </u>
National Security Service	4,000*	2,000	2,000		
National Service for Combating	2.000*	1 000	1 000		
Organised Crime	2,000*	1,000	1,000		
National Police Service	27,000	29,700	29,700		
National Police Service (seized)				1,200	
National Border Police Service	8,162	8,978	8,978		
National Gendarmerie Service	2,000	2,200	2,200		
Fire department	5,000*	5,500			
Mol Subtotal		49,378	43,878	1,200	94,456
Other agencies					
Bulgarian Customs Agency	3,147 - 4000	500			
Forest Rangers	2,800			550	
National Prison Administration	5,850	6,435			
Ministry of Justice Police	900	990			
National Protection Service	1,000	1,100	1,100		
Other agencies subtotal		9,025	1,100	550	10,675
Civilians (as of 31 December 2003	3)				
Self-protection				125,497	
Hunting				151,452	
Legal entities (including some private security)				28,675	
Other (sports, collections)				10,314	
Gun shops	269 (x 150)			40,350	
Shooting ranges	69 (x 30)			2,070	
Illegal (lower estimate)				93,206	
Civilian subtotal				451,564	451,564
Country total					1,060,791

Table 4: Estimated distribution of official weapons stocks by agency.

Note: In the case of the Bulgarian Armed Forces, the number of weapons in service (columns three and four) has been estimated using available data on the number of armed personnel and a 'force multiplier' (see text). * = Estimates of classified number of personnel.

A detailed breakdown of the weapon types held by Bulgaria's security forces is provided in Annex B.



1.2 Illegal SALW

1.2.1 Numbers in circulation

The regularity with which the Bulgarian police seize illegal weapons is an indication that weapons of this kind continue to be available in the country. Police seizure statistics show that the average number of seized weapons is 1,212 units over the last five years.

YEAR	1999	2000	2001	2002	2003 *	AVERAGE
Confiscated firearms	1,346	958	1,458	1,074	1,224	1,212
Firearms reported stolen	136	210	219	240	237	208
Total	1,482	1,168	1,677	1,314	1,461	1,420

Table 5: Weapons seized by security agencies, or reported stolen to police (1999–2003).⁴¹

Note: Seizure statistics in the above table are totals recorded by all agencies under control of the Mol. Seizures recorded by the Customs Agency are ignored to avoid double counting (there is considerable overlap with Border Police figures, but the differences are not large in terms of overall seizures).

They also offer an insight into the type of illegal weapons circulating in the country at any one time, particularly among criminals:

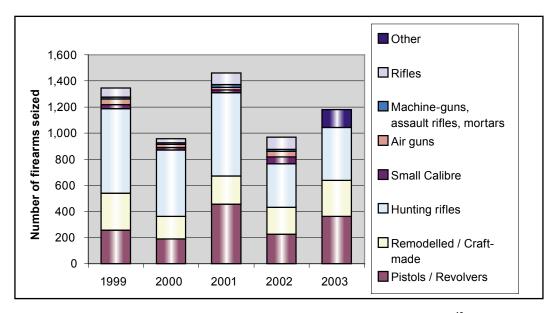


Figure 4: Breakdown of seized illegal weapons by type (1999–2003).⁴²

The research team used a number of different sources in order to gauge the exact number of illegal weapons in circulation. These included the available statistics on police seizures of illicit weapons and the use of illicit weapons in firearm suicides. Estimates provided by 'key informants' and HHS and FGD participants were also taken into account, though they provided quite divergent figures. Based on an extrapolation of the annual seizure rate, the Bulgarian Mol estimates that in the last five years some 40,000 units of illicit firearms have entered the black market.⁴³

^{*} Note: MOI agencies used a different method from previous years when compiling data for 2003.

⁴¹ Source: Mol, NPS and NSCOC.

⁴² Source: Mol, NPS.

⁴³ The figure was calculated on the basis that the 1,200 to 1,400 illicit SALW seized by police each year represent around 20% of the total number in the black market, and that the 100 additional illicit weapons of Bulgarian origin seized by police in other European countries each year represent around 10% of the total smuggled out of the country. Mol, official communication to CSD, 15 February 2002.



One member of parliament, a former shooting champion, has claimed that there are about one million illegal SALW in the country, explaining that before 1989, shooting clubs, and the Organisation for Defence Co-operation (ODC), gave out large numbers of weapons before being dissolved in the 1990s. This statement was contradicted by a NBPS official who stated when the Voluntary Organisation for Defence Co-operation was disbanded in 1968, many sports weapons simply 'disappeared'. He did however add that controls over sports and military weapons were considerably improved in 1974 and 1984. Another border control officer with many years' experience at the CHDO has also put the number of illegal SALW at around one million. While these comments are a valuable insight into the perceptions of officials who have a specific interest in SALW control, they are not the result of any systematic calculation, and should therefore be viewed with caution.

The above estimate provided by the Mol, although realistic about the number of weapons circulating in the black market, does not account for 'dormant' illicit weapons such as those left-over from WWII, or unregistered hunting rifles in rural areas. Previous academic work into the use of guns in violent crimes and suicides suggests that there is a strong, positive correlation between suicides committed with firearms and the levels of societal weapons possession.⁴⁷ Thus, the greater the proportion of suicides committed with firearms in a particular country, the higher the number of households possessing at least one firearm. 48 It is to police records that one must look to discover whether legal, or illegal firearms have been used in particular suicide cases. In Bulgaria, the legal/illegal firearm breakdown is only available from the statistics for 2003. During that year, 42 suicides (62.69 percent of the total), were recorded as having been carried out with legal firearms, and 25 (37.31 percent), with illegal ones. If one presumes that those intending to commit suicide are no more likely to use a legal than an illegal weapon, this would indicate that around 37 percent of the weapons available in households are illegal. For practical reasons though, a large majority of suicides are carried out using hand guns, probably somewhere in the order of 80 percent. 49 According to CHDO data, at the end of 2003 there were 145,816 civilian registered hand guns in Bulgaria. If the assumptions above are warranted, the official statistics for 2003 would have captured only 62.69 percent of the total number of hand guns in the country. The true number would actually be 231,908, a figure which includes 86,782 illegal weapons. Table 6 below gives low, average and high estimates of the number of illegal hand guns.50

	EST. No. OF ILLEGAL HAND GUNS (AVE.)	PERCENTAGE	EST. No. OF ILLEGAL HAND GUNS (LOW)	PERCENTAGE	EST. No. ILLEGAL HAND GUNS (HIGH)	PERCENTAGE
Legal hand guns	(145,816)	62.69 %	(145,816)	74.34 %	(145,816)	51.04 %
Illegal hand guns	86,782	37.31 %	50,331	25.66 %	139,874	48.96 %
Total	232,598	100 %	196,147	100 %	285,690	100 %

Table 6: Estimated number of illegal hand guns using 2003 firearm suicide statistics.

⁴⁴ Interview, Matova, 2004. The ODC was a wide network of sports clubs and shooting ranges around the country where it promoted activities and sports that could provide skills to support the military in the event of an emergency.

⁴⁵ Interview, Stoyanov, 2004.

⁴⁶ Interview, Parlev, 2004.

⁴⁷ Killias et al, 2001.

⁴⁸ While significant variations in suicide rates, and the use of different suicide methods, are apparent across the globe, the fact that the occurrence of firearm suicides has been observed to vary with levels of firearms ownership indicates that there is likely to be a positive correlation in Bulgaria.

⁴⁹ Hand-guns are over-represented in all forms of gun crime and violence, accounting for around 80% of cases sampled in one study. See Cook, 1991.

 $^{^{50}}$ Assuming random sampling for ease of calculation, at the 95% confidence interval, the 62.69 figure could vary by +/- 11.65%.



In addition to any illegal hand guns in the country, there will of course be other types of unregistered weapons such as hunting guns. Police records of the different types of illegal weapons seized are a useful basis for estimating how many weapons there are. Table 7 below, shows the breakdown of police seizures by type for the year 2003, and by extrapolation, an estimate of the total number of illegal weapons in circulation.

TYPE OF WEAPON	NUMBER OF UNITS SEIZED (2003)	TYPE AS PERCENTAGE OF ALL SEIZED	EST. NO. OF ILLEGAL WEAPONS (LOW)	EST. NO. OF ILLEGAL WEAPONS (HIGH)	EST. NO. OF ILLEGAL WEAPONS (AVE.)
All types of hand gun *	639	54%	50,331	139,874	86,782
Smooth-bore firearms	440	37%	34,486	95,840	59,462
Rifled hunting rifles	65	6%	5,592	15,542	9,642
Others	36	3%	2,796	7,771	4821
Total	1,180	100%	93,206	259,026	160,707

Table 7: Estimates of total number of illegal weapons of all types in Bulgaria using police seizure pattern for 2003.

Note: * Since the majority of seized remodelled weapons are actually hand guns, calculations have been made on the basis of a combined category 'all types of hand guns', which combines the number of remodelled and craft weapons seized during 2003 (23 percent of overall seizures), with pistols and revolvers seized (31 percent).

On the basis of these calculations, the research team estimate that there are somewhere between 93,206 and 259,026 illegal SALW in Bulgaria today, the mean estimate being 160,707 units. It should be emphasised, however, that this is a tentative estimate, based on a method that has several important limitations. Firstly, the proportion of suicides in which illegal weapons are used will vary from year to year, so the 2003 figures may not be typical. Secondly, it may be unwise to make generalisations from the police seizure statistics above about the distribution of unregistered weapons in the population as a whole, since many Bulgarians with illegal weapons will be otherwise law-abiding citizens who are unlikely to feature in police statistics. There may be other distortions too, such as the fact that registered owners will be more likely to store weapons safely (as required by the law), making access more difficult. It will be possible to make more precise estimates in the future if the NPS continues to record the proportion of illegal weapons used during suicides in future years. In addition, were the CHDO to begin keeping records of the number of stolen weapons that the police recover as part of their annual seizures, an alternative method could be used to calculate the number of illegal weapons in circulation.⁵¹

1.2.2 Distribution of illegal SALW

HHS results and FGDs show that the popular perception is that the large cities, like Sofia or Plovdiv, as well as the small arms industry regions, such as Stara Zagora, have many illegal firearms (see section 3.6). Better measures are available though, since police data gives the seizure rate for illegal weapons and the number of reported weapon thefts by region.

Photo 3: On 28 January 2004, during a police raid on drug-dealers in Sofia's Nadezhda district, Bulgarian police arrested a 48-year old man. His apartment was found to contain drugs. fake documents, two hand guns, and assault rifle ammunition. Documents found in the apartment indicated that this



individual had previously sold two heavy machine-guns, four hand guns with silencers, an RPG, a rifle with an optical sight, and plastic explosives.

⁵¹ Unfortunately the police do not retain statistics on what proportion of the weapons that have been reported as stolen are eventually recovered during seizure operations. Interview, Vassilev, 2004.



Using the rates of seizure and theft as proxies for the concentration of illegal weapons, the regions of Vratza, Haskovo, Shumen and Pleven emerge with the most illegal firearms per 10,000 people. The Stara Zagora region also has a high-concentration of illegal weapons. Since the majority of reported cases in this area relate to illegal craft production (see section 1.2.2.3), this is probably because of the illegal trade in weapons in the area. The high rates in the regions of Haskovo and Montana are probably attributable to the high-levels of trans-border crime in these regions. More research is needed to explain why other regions show high rates of seizure and theft. One possible explanation might be more efficient police practices in these areas.

In most of the regions featured in Figure 5 thefts and seizure rates have dropped over the 1999–2003 period, which may be a sign that the concentration of illegal weapons in the country is decreasing. On the other hand, assuming that theft and seizure rates are reliable proxies, further investigation is probably warranted in those areas that show an upward trend. In order to draw any firm conclusions though, more information would be needed on policing practices in each area. The high rate of thefts and seizures in Sofia, and increases in both areas, may well be fuelling the public's perceptions that there are a larger number of illegal weapons in the capital.

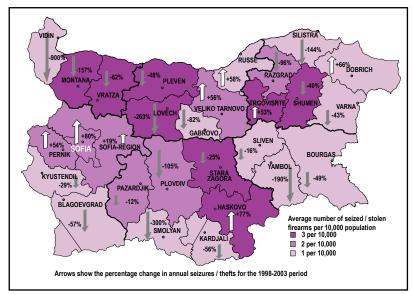


Figure 5: Average number of seized and stolen weapons per 10,000 persons (1999-2003).⁵²

Note: For each municipality, the number of weapons reported stolen has been added to the number seized by security services and the total divided by five to provide the annual average.

The demand for illegal weapons in Bulgaria appears to be driven by several factors, the most important of which is the need that criminals have for unregistered weapons. While hand guns are in high demand across the criminal fraternity, organised crime groups are the main users of Kalashnikov assault rifles and sniper rifles, as demonstrated by the occurrence of several high-profile assassinations in Bulgaria in the past two years (see Box 2).

As police and customs seizures across the region show, a second stimulus for the illegal trade in weapons, and particularly for their illegal production, is the black market created by criminal gangs in Western Europe or neighbouring countries. The financial incentives for Bulgarian illicit producers are particularly strong in the case of foreign clients (see Table 8 below).

A third factor driving illicit possession is a minority of hunters who turn to the illegal market to obtain cheap weapons. This type of weapon continues to appear in police seizure statistics year on year, albeit in small numbers.

There is also a small demand for illegal weapons among citizens who have failed to obtain a permit. HHS results and FGDs indicate that perceptions of rising crime and police inefficiency are the main demand drivers among this group. Those who fail to obtain a permit sometimes choose to purchase gas-spray pistols, some of which

⁵² Source: Mol, NPS.



Box 2: High-profile assassinations⁵³

- On 05 June 2004, two assassins dressed as priests entered the lobby of the Art Deco coffee shop in Sofia, shooting
 two individuals and injuring three others, all of whom were thought by police to be involved in the sale of illegal
 drugs.
- On 30 July 2004, assassins with at least seven different types of firearms, including assault rifles, killed six and
 injured two, in Slavia restaurant in Sofia. The victims were thought to be involved in drug distribution and numerous
 other illegal activities.

are then converted into firearms.⁵⁴ Because the denial rate for civilian weapon permit applications is extremely low, however, the contribution this group makes in driving the illegal market group should not be overestimated. According to the CHDO, the typical denial rate for civilian weapon permit applications across the country in 2003 was 5 percent for applications for hunting rifles and 11 percent for hand guns for self-defence. FGDs also provided evidence that some individuals who are denied permits try – with success – to obtain them by bribing officials (see Section 3.2).

In general, illegal arms are more expensive than legal ones in Bulgaria (see Table 8 below). The exact price for illegal weapons is determined by several factors, including the type of weapon and the number of intermediaries involved in a particular sale. ⁵⁵ The cheapest option of all is to buy a remodelled gas-spray pistol. Once remodelled, these weapons sell for around EU 150 – 210 on Bulgaria's black market. If however they are exported to Greece or Spain, they can be sold for around EU 500. Bulgarian-made army and police weapons (eg Makarovs), sell for around EU 200. Kalashnikovs, usually stolen from military stockpiles or assembled from parts smuggled out of factories, sell for as much EU 350. A range of foreign weapons are available on the black market, but at a much higher price (eg a Beretta or Glock pistol would cost around three to four times the price of a Makarov).

BRAND FIREARMS	STORE/FACTORY PRICE (EURO)	BLACK MARKET PRICE IN BULGARIA (EURO)		
Baikal gas-spray hand gun, 8 mm IZ-79-8 Makarov	110	150 – 210 (range for remodelled)		
Makarov-Arsenal (9 mm Bulgarian made)	85 - 100	200		
Kalashnikov	100 - 150	350		

Table 8: Black market weapon prices.⁵⁶

1.2.3 Sources for illegal SALW

The illegal market appears to be supplied from a number of different sources which are discussed further below:

- Household thefts.
- Thefts from military depots.
- Thefts from factories.
- Illegal production by former defence or metal industry employees.
- Cross-border smuggling.

 $^{^{53}}$ Sources: Sega, 05 June 2004; and Trud, 31 July 2004.

⁵⁴ In their original state, these weapons look exactly like real guns, giving the owner an effective deterrent, but do not fire a projectile. Instead they release gas at high pressure. They are unlikely to cause a serious injury, even at close range.

 $^{^{55}}$ The prices quoted below are based on in-depth interviews with former and current workers at Arsenal JSC, as well as with MoI officers.

⁵⁶ Sources: Shop-prices are based on information from www.oragie.com. Illegal firearm prices are based on FGDs and interviews with NSCOC staff.



1.2.3.1 Household thefts

A statistical analysis of police records shows that there is a high correlation across the country's twenty-eight regions between the occurrence of weapon theft and the rate at which the police seize illegal weapons.⁵⁷ In other words, there is strong evidence that theft is a source of illegal arms. Most recorded thefts are from private households, probably because the law imposes strict security standards on gun shops. Police data shows that the gradual increase in the number of weapons among the civilian population since 1998 has been accompanied by a significant increase in the number of weapon thefts, which are now running at around 1 theft per 1,300 registered weapons. Yet while the absolute number of thefts may be increasing, the increase is proportionally less than the growth in registered firearms. As Figure 6 shows, Bulgaria also compares reasonably well with other countries in this respect.

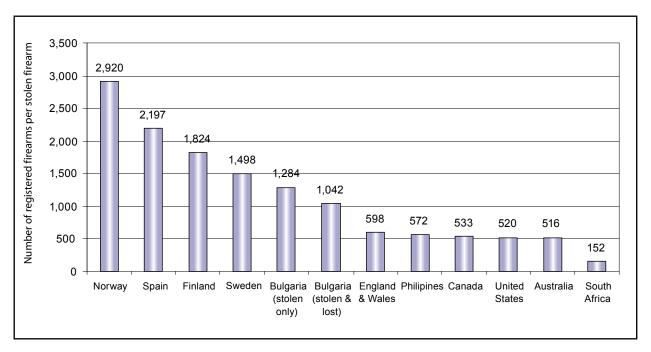


Figure 6: Number of registered firearms per stolen firearm. 57a

One possible explanation for the limited increase of firearm thefts in proportion to overall ownership might be that household storage standards are relatively high, thereby serving to prevent theft. Although the Bulgarian laws for home storage certainly require precautions to be taken against theft, it is difficult to determine how rigorously they are adhered to by weapon owners (see also Section 2.1.1).

Further constraints on this source may now be in place since in 2004 the theft of firearms and explosives was designated a 'grave threat' and made punishable by imprisonment for a period between one and ten years (any effect of this change has yet to be seen however and will depend in part on judicial practice – see also Section 4.2.9).⁵⁸

⁵⁷ The actual correlation is 0.609, statistical correlation being denoted by a number between 0 and 1, the latter denoting a perfect correlation between two events and any number over 0.5 indicating that the two sets of observations are strongly correlated.

^{57a} Source: Calculations on Bulgaria are based on Ministry of Interior, National Police Service. Data on other countries is taken from Small Arms Survey, 2004, p 63.

⁵⁸ Penal Code, §195.10, State Gazette No. 26, 2004.



	2003	2002	2001	2000	1999
Stolen firearms	237	240	219	210	136
Lost firearms	55	42	45	28	14

Table 9: Lost and stolen firearms, 1999-2003.59

TYPE OF OWNER		TYPE OF FIREARM			
Companies	26	Hand guns	159		
Private individuals	138	Smooth-bore barrel (up to 510 mm)	7		
MoD or Mol officers	27	Smooth-bore barrel (longer than 510 mm)	54		
Collectors	9	Rifled hunting rifles	17		

Table 10: Reported firearms thefts for 2003.⁶⁰

1.2.3.2 Military depots

There is strong evidence that Bulgaria's military depots are a source of illicit weapons. The problem appears to have been at its worst several years ago when army restructuring was at its height and SALW were regularly being moved to new military bases around the country in great numbers. In 2002, the Military Police and Military Counterintelligence Security Service (MPMCS) reported five cases of weapon theft, stating that arrests were made in four cases. ⁶¹ This was the lowest figure in the 1996–2002 period, falling from twenty-two thefts in 1996, to nine in 2001 and then to five in 2002. Reports indicate that most of the stolen weapons in these cases were 9 mm Makarov pistols and 7.62 mm Kalashnikovs. In one case, however, the security service also reported fifty pistols, seven submachine-guns and twenty-two *Neto* hand-held anti-tank rocket-propelled grenade launchers (RPGs) (ten of them stolen from a military unit in the town of Strajitza) as being among the stolen items. ⁶²

However, in January 2003, media reports appeared to show the Chief of the General Staff, General Kolev, publicly admitting that the transfer of large quantities of arms and munitions to new locations during the downsizing process had directly undermined security. The comments attributed to Gen Kolev implied that during this period the movements of weapons was not closely monitored, and that opportunities for theft were created because although military units performed regular inventories, they were often conducted in a superficial manner and close inspection was rare. Information on stolen military SALW is said to be classified by the MPMCS who were unable to supply any further information on the subject to the researchers. The pattern of thefts would seem to indicate that the current stockpile security problem is focused at active military bases across the country rather than the surplus and reserve stockpile which is stored at the Central Storage and Technical Maintenance Base (CSTMB).

In January 2004, the Chief of the General Staff also stated that stockpile thefts are not a serious cause for concern. He claimed that during the 2002–3 period there was a 33 percent decrease in weapons and ammunition thefts. A second MoD official has gone on record to say that the problem of illicit trafficking in the country is of more concern than that of stockpile thefts. This comment is undoubtedly correct in terms

⁵⁹ Source: Mol, NPS.

⁶⁰ Source: Ibid.

⁶¹ Monitor, 11 January 2003.

⁶² Sega, 18 January 2003.

⁶³ Dnevnik. 11 January 2003.

⁶⁴ According to the Mol however, their statistics on stolen weapons include thefts from military sources.

⁶⁵ The General also remarked on the theft of 5 assault rifles from a military base in Samokov and 7 assault rifles from a base in Ponor during his statement. Sega, 24 January 2004.

⁶⁶ Statement made by Yordan Bozhilov, International Organisations & Arms Control, Ministry of Defence Bulgarian Red Cross seminar on Non-Proliferation of SALW, 03 – 04 November 2004, Sofia.





Photo 4: On 23 March 2004, the Sofia regional bureau of the NSCOC raided an apartment in Sofia, where officers found 50 kg of explosives and over 6,000 rounds of ammunition for Kalashnikov assault rifles and Makarov pistols. They arrested a former military officer who had apparently stolen large amounts of ammunition over a long period of time. Only two weeks earlier in another raid, the RSCOC seized 250 rounds of Kalashnikov ammunition in a private basement in Sofia's Zapaden Park district.

of the absolute numbers reported, but it also raises the question of how many undetected thefts are occurring. It is to be hoped that the army's public admission of past problems and the gradual consolidation of new military structures will have had beneficial effects. In an attempt to prevent stolen military equipment being smuggled out of the country, in September 2004 the Customs Agency and MPMCS signed an agreement on information exchange, in which the MPMCS will provide regular information on stolen or missing military equipment and arms.⁶⁷

1.2.3.3 Illegal production and factory thefts

One of the most significant sources of illegal firearms are craft producers who either make weapons using parts stolen from factories, or who remodel gas-spray weapons to allow them to fire live ammunition. In 2003, these combined sources accounted for 23 percent of all seized illegal weapons – a five-year high.

	2003	2002	2001	2000	1999
Remodelled or illegally produced firearms seized	276	206	216	173	282
Percentage of total illegal firearm seizures	23%	21%	15%	18%	21%

Table 11: Remodelled or illegally produced SALW as a percentage of police seizures (2000-2003).⁶⁸

According to the NSCOC, illegal firearms production is most often encountered in the Stara Zagora region, particularly in and around the town of Kazanlak, a traditional SALW production area, home to the country's biggest SALW producer, Arsenal. The table below shows the spread of illegal weapons seized by the NSCOC during the past four years, highlighting the high number of seizures that occur in the region. Since the NSCOC is mandated to work on organised crime cases, a substantial proportion of its work concerns illicit SALW production.

⁶⁷ Customs Agency, October 2004.

⁶⁸ Source: Mol, NPS.



		AUTOMATIC WEAPONS					HAND GUNS				
REGION	CITY	2000	2001	2002	2003	TOTAL FOR REGION	2000	2001	2002	2003	TOTAL FOR REGION
	Gabrovo				1			1	1	10	
NC	Veliko Tarnovo		1		1	4	2		3	2	24
INC	Pleven				1	4		3			24
	Ruse							1	1		
	St. Zagora	9	7	9	2		19	6	1	24	
	Plovdiv				1		4	2	4	5	
00	Kardjali					00	2	7		3	00
SC	Haskovo					29			1		86
	Pazardjik		1					6		1	
	Smolian									1	
	Varna	5	1			7	2	2		1	
N.E	Silistra						1				00
NE	Shumen			1			2	5	6	2	22
	Razgrad							1			
	Vidin							2	10		
NW	Vratza					0	3	2	2	8	27
	Yambol				1		1		2	3	
SE	Sliven		1		1	3		2	3	1	16
	Burgas						2			2	1
	Blagoevgrad	1	5		1		1	5	2	10	
0111	Sofia			2		4-		10	5	2	
SW	Pernik		3		2	15	2	2	2	15	62
	Kiustendil				1				1	5	
Total		15	19	12	12	58	41	57	44	95	237

Table 12: Number of illegal weapons seized by the National Service for Combating Organised Crime (2000–2003).69

Interviews carried out with current and former workers from the Arsenal plant in Kazanlak indicate that a minority of employees steal firearm parts from the production facilities and pass them on to local craftsmen who use them to make firearms (see Box 3). Officials from the regional headquarters of the NSCOC estimate that there are around 300 individuals in the region who are involved in craft production. For example, in January 2004, six individuals were arrested in the Stara Zagora and Plovdiv regions because of their connections with illegal arms manufacturing in the village of Enina, near Kazanlak. From 2002–2003, the NSCOC raided twenty illegal firearm craft shops in the Stara Zagora region alone.⁷⁰ Although this constitutes a serious problem, the situation is believed to have improved considerably over the last decade or so.⁷¹

The other important source of illegal arms is the remodelling of gas-spray pistols. According to the NSCOC, a few years ago the great majority of these weapons were remodelled in the regions of Stara Zagora and Kazanlak. Since 2003 however, craft shops involved in remodelling have also been discovered in Varna, Vratza and Sofia.⁷² The remodelling process typically starts with the purchase of Baikal gas-spray guns (lzh-70, lzh 78-8 or lzh-79), which cost about EU 100. The barrel is knocked out with a wooden hammer and is replaced with a factory-made barrel, usually stolen from a factory.⁷³ Although the authorities have considered regulating gas-spray pistols, either through import or purchase controls or a registration scheme, there are presently no restrictions in place (see Box 4 below).

⁶⁹ Source: Mol, NSCOC.

⁷⁰ Bulgarian National Television, 18 January 2004.

 $^{^{71}}$ In the early 1990s, security at the Arsenal plant was worse – around 1,000 Kalashnikovs are believed to have been gradually stolen between 1990 and 1997. Sega, 19 January, 2004.

⁷² Unofficial letter to CSD, 15 August 2003.



Box 3: In-depth interviews with Arsenal and VMZ Workers

From 22 – 25 September 2004, ten in-depth anonymous interviews were conducted with former and current workers from two companies — VMZ and Arsenal. While VMZ workers denied that employees were involved in the smuggling of weapons or their components, the Arsenal workers claimed that thefts do occur at their company.

The Arsenal factory is close to residential areas and occupies several hundred acres in Kazanlak. There are three security perimeters at its production facilities. At the first level, the company premises are surrounded by 3 – 4 metre-high walls topped with barbed wire. At the second level, inside, there are additional gates and a simple fence that separates the administrative and production areas. Although the entry and exit points are controlled, no metal-detector inspections or searches take place. The third perimeter is at building level where, according to interviewed workers, stockpile inventories and finished-product security are best. In the various production departments security is not very strict, "except when there is a visiting delegation".



Photo 5: The Arsenal factory, Kazanlak: the second security perimeter on the company's premises.

All interviewed workers pointed out that security was much higher before 1989. During that period the police or military were in charge of security, while some workers were paid to report on their colleagues. While current private security guards are regarded as less competent, under-paid, and often more corrupt than their Communist-era colleagues, the factory's Executive Director pointed out that plant security was "up and above what the company should be expected or could afford to pay".

According to the interviewees the main reason for thefts is the low salaries; EU 70-130 a month for those on the factory floor and EU 100 for security guards. One interviewee explained that the components for weapons can be sold on at between EU 10 and EU 50 a time depending on the part, and that an entire Makarov pistol sells for EU 200.

When interviewed, the Executive Director of Arsenal, Mr Nikolai Ibushev, admitted that there were some component thefts but pointed out that the

company works in close co-operation with the NSCOC as well as the local police in order to minimise such cases. He stated that he has fired "dozens of workers not only smuggling out arms parts but even for stealing things as simple as a bolt".

Most workers agreed that the theft of entire weapons is rare, but still theoretically possible. They also agreed that it was the underpaid or temporary workers that most often steal parts. Only one interviewee claimed that the management was involved in the theft of parts.

The most commonly smuggled weapon component was said to be the barrel, since this part requires the specialised production methods that only a factory can offer. Barrels are stolen before they can be marked with production numbers. Apparently one weak point in the production process is the discarding of defective parts that can still be used to make a low-quality firearm. No exact count is kept of discarded defective parts, which apparently allows some of them to be stolen.

Several methods for smuggling parts off the factory grounds were described, eg, "One can always throw a part across the walls and come and collect it later". Another option is just to walk through the gates. Although there is some risk attached, it was said that if one gets caught the guards are ready "for Leva 10 - 15 [EU 5 - 7] to keep their eyes closed." The final possibility that was mentioned was to use service vehicles.

Stolen weapon parts are usually sold to intermediaries – local coffee-shops, kiosk owners, and former workers with illegal craft-shops. Other potential clients are unemployed former workers that want money to travel abroad for work (particularly to Spain or Portugal), who just want a hunting rifle.

⁷³ Non-Izh gas-spray pistols are difficult to remodel because their barrels cannot be separated and because the gun is made of non-steel metals that cannot withstand the pressure created by firearm ammunition. Bulgarian National Television, 18 January, 2004.



Box 4: The problem of remodelled gas-spray guns

The number of gas-spray guns in circulation is unknown and difficult to estimate. Although the law required these weapons to be registered with the police until 1998, tens of thousands of them have been sold since then. A spate of high-profile murders in late 2003 committed with remodelled gas-spray led to increased calls for the regulation of their import and sale. The problem centred largely on the illegal modification of PSM-lzh 70 and lzh-79 'Baikal' models. In January 2004, under pressure from the police and the NSCOC, the Mol considered the introduction of permits for the importation and ownership of gas-spray guns. One difficulty with this proposal is that the relevant legislation currently defines firearms as, "technical devices that could eject a hard object." Even with a legislative amendment however, the supposedly high number of such weapons already in circulation would mean that introducing a requirement for an import permit would not significantly affect domestic supply. No action has yet been taken to regulate these weapons. The Bulgarian authorities also see the fact that neighbouring countries do not control these weapons as a further impediment to any restrictions they might introduce.

1.2.3.4 Illicit trafficking

Ongoing problems with border security have left the country susceptible to illicit trafficking of a number of commodities, including SALW.⁷⁷ The most acute problem is the security of border facilities and the need to upgrade equipment for border control. Of particular concern is the security around airports and seaports, where most Bulgarian arms exports take place, in particular in the towns of Varna and Burgas, the two biggest ports on Bulgaria's 320 kilometre Black Sea coastline (see Section 4.2.4).

Despite the efforts of security and border control agencies, it is clear from this research that individuals regularly smuggle small quantities of SALW through Bulgaria's borders. Data provided by the Customs Agency⁷⁸ shows that for the period 1998 – 2003, out of a total of 86 cases in which trafficked SALW were seized, 53 cases (or 62 percent) were in vehicles transiting Bulgaria. Fourteen cases were recorded where Bulgaria was the final destination (an 'import') and nineteen cases where vehicles were leaving Bulgaria (an 'export'). In the cases of illegal 'imports' it is not clear whether the smuggled SALW were eventually destined for re-export.

According to one customs official at the Kapitan Andreevo border crossing with Turkey, 20 percent at most of all smuggled weapons and drugs are seized at the borders. ⁷⁹ In fact this is probably a high-end figure because only about two percent of the passing vehicles are even inspected. The wide variation in border seizures over time also shows this percentage is likely to vary. Reported seizures of Bulgarian weapons in other European countries are also a useful indicator. According to the Bulgarian Mol, in the past two years, law enforcement agencies in Western Europe have identified approximately 100 seized weapons as being of Bulgarian origin. ⁸⁰ This indicates that for most years, Bulgarian border control agencies are certainly seizing less than 50 percent of smuggled SALW.

Customs data also allows seizure rates at different border crossing points to be compared. The available figures point to the main route for trafficked SALW being the Turkey - Serbia and Montenegro route, though one must also bear in mind that the effectiveness of customs agents and border guards may vary between border points, in turn influencing seizure rates. Along the Turkey - Serbia route most of the 'transiting' arms were being trafficked to Western Europe, although a small number were also smuggled into Turkey. From 1998 – 2003 there were a total of 53 cases (or 61 percent of the total), along this route. Some of the smuggled imports on the route are

⁷⁴ Dnevnik, 11 January 2004.

⁷⁵ Article 4, LCESFA.

⁷⁶ Interview with representatives of Izhmaj guns, official importers of Izh guns, at the Hunting Arms Expo, Sofia, 7–8 September 2004.

⁷⁷ EU Commission, 2003, pp 104–106.

⁷⁸ The Border Police also register seizures of illicit goods, but Customs Agency data is much more comprehensive because as it registers all violations, while the Border Police only registers violations uncovered by its own officers.

⁷⁹ Interview with a Customs Officer, Kapitan Andreevo border crossing, February 2004. His reasoning was that once seizures intercept 20% or more of the illegal transfers, it is no longer financially advantageous to attempt smuggling. Since shipments continue to be intercepted regularly, one can infer the proportion of illegal shipments being intercepted is below 20%.

⁸⁰ Interview, Gaidarski, 12 December, 2004.





Photo 6: Fully loaded weapons seized by customs officers at the Bulgaria – Serbia border, on 09 December 2004: 11 pistols, 4 silencers, 40 rounds of ammunition.

cheap Turkish hunting weapons intended for sale in Bulgaria. Others are guns for criminal use smuggled from Serbia into Bulgaria.

The second-highest smuggling destination appears to be Macedonia, with 18 (or 21 percent of all cases), of all outgoing seizures being recorded at that border between 1998 and 2000. According to one official interviewed, in recent years Macedonia has become a destination for both illegally and legally exported Bulgarian SALW. The types of exported or smuggled weapons are not only pistols but also semi-automatic Arsenal-made hunting rifles, whose intended use is not always clear.⁸¹

BORDER CROSSING WITH COUNTRY	1998	1999	2000	2001	2002	2003	TOTAL CASES
Turkey	8	0	14	4	1	5	32
Serbia & Montenegro	2	1	1	1	7	9	21
Macedonia	1	2	8	4	3	0	18
Romania	2	0	0	0	3	1	6
Greece	-	-	-	-	1	1	2
Internal Customs	4	-	-	2	-	1	7

Table 13: Customs seizures by border crossing point (1998 - 2003).82



Photo 7: February 2003, two smuggled weapons, a Kalashnikov assault rifle and a Makarov pistol, are intercepted at the Novo Selo customs post on their way to Greece.

The numbers involved in these cases do appear small and consequently in those years where a sudden increase in the number of smuggled weapons is apparent, it is usually because of a single shipment. For example, the increase between 2001 and 2002 can mostly be attributed to a case in December 2002 when a Greek man and a Bulgarian woman tried to smuggle into Greece (through the Novo Selo border post), 3 Kalashnikovs, 52 Makarov pistols, a Kalashnikov grenade launcher, 3 PSM pistols, 1 Star pistol, 10 silencers, an optical sight and 3,000 pieces of ammunition. Most of the weapons were unmarked, frustrating efforts to trace their origin. The much higher prices of such weapons in Greece fuel ever more attempts to smuggle and sell firearms there.

⁸¹ Interview, Parley, 08 July 2004.

⁸² Source: Customs Agency, MoF.

⁸³ The arms were hidden in a gas cylinder. Sega, 03 December, 2002.

⁸⁴ Customs Press Centre, 13 February 2003.



SALW TYPE	1998	1999	2000	2001	2002	2003
Firearms	6	3	235 (198)	4 (2)	77 (13)	35 (36)
Gas-powered weapons	7	0	17 (12)	12 (12)	131 (12)	5 (3)
Ammunition	6,143	15	64,976 (23,560)	1,630 (358)	8,904 (680)	1,175 (1076)
Grenades	-	-	-	-	10	-
Magazines	-	-	-	1	2	8
RPG	-	-	-	-	-	(2)
Detonators	-	-	-	-	-	(15)
Silencers	-	-	-	ı	17	21 (21)

Table 14: Customs and Border Police⁸⁵ SALW seizures (1998 - 2003).⁸⁶

Previous studies have suggested that international bus companies that run services through Bulgaria are sometimes used by organised criminal networks to move money, drugs, prostitutes and occasionally small arms, across international borders.⁸⁷ Customs data gathered during this research also shows that bus companies are being used to traffic illegal firearms, since they are the second most common means of transport in cases of weapons seizures at border crossing points (see Table 15). Private cars appear to be the most common method, and some of the biggest seizures involve their use, as seen in the example above.

VEHICLE TYPE	1998	1999	2000	2001	2002	2003	TOTAL
Passenger car	9	1	8	2	9	11	40
Passenger bus	2	1	5	5	1	2	16
Commercial truck	-	-	6	1	2	1	10
Van	1	-	3	-	1	2	7
Airplane	1	-	-	2	-	-	3
Train	1	-	-	1	-	-	2
Without vehicle	1	1	2	-	2	-	6
Postal delivery	1	-	-	-	-	1	2
Total	16	3	24	11	15	17	86

Table 15: Customs seizures by type of vehicle (number of incidents).88

Customs officers and border guards interviewed for this research assert that the 'green border' (unofficial crossing points in rural areas) is a common route for small-scale arms traffickers. In most such cases weapons are part of a larger, mixed consignment of contraband, such as drugs or migrants, indicating that trafficking in SALW is only one element of a larger problem.⁸⁹ For example, in February 2004, two smugglers were apprehended by the Border Police near the border town of Petrich accompanied by nine illegal Indian migrants. In addition to

⁸⁵ The Border Police provided data only for the 2000 – 2003 period due to technical difficulties in collecting information for the previous years. Their numbers are given in brackets.

⁸⁶ Sources: Customs Agency, MoF/MoI, NBPS.

⁸⁷ Bezlov et al. 2004, p 37.

⁸⁸ Source: Customs Agency, MoF.

⁸⁹ Interview with NBPS official, 15 July 2004.



2.6 kg of cannabis, the smugglers were in possession of a 7.62 mm Kalashnikov assault rifle and 99 rounds of ammunition. This case also exemplifies another trend in recent years, the increased participation of Bulgarian nationals in trans-border crime. For much of the 1990s, drug transit through Bulgaria was the monopoly of ethnic-Albanian crime groups from the former Yugoslavia and Albania. Since 2001, however, state intervention has gradually reduced the traditional sources of income for Bulgarian crime groups, such as racketeering and the smuggling of consumer goods. As a result they have become ever more involved in the smuggling of drugs, people and occasionally weapons.

NATIONALITY	1998	1999	2000	2001	2002	2003	TOTAL
Bulgarian	2	-	5	2	4	5	18
Turkish	4	-	3	1	4	3	15
Macedonian	-	2	7	2	3	-	14
Yugoslavia/Serbia and Montenegro	-	1	4	1	-	1	7
Albanian	1	-	3	-	-	-	4
Others (over 12 different nationalities)	9	-	2	5	5	8	29

Table 16: Nationalities of individuals apprehended smuggling arms through Bulgaria (number of cases).91

1.2.3.5 Communist-era weapons

The research team were unable to find any reliable information on another potential source of illegal weapons, namely those individuals who acquired weapons during the late 1980s and early 1990s, at a time when old state structures were dissolving and controls over stocks held by organisations like the ODC, or defence facilities were weak. Some proportion of the unregistered weapons currently circulating in Bulgaria will certainly have come from this source, since as one FGD participant, previously an ODC employee, put it, "Before [1989] lots of firearms were distributed in factories – in electronics plants, in mechanical plants, in the transport companies, lots of ODC sports firearms, including hand guns, small calibre pistols, sports shooting rifles. All these were given out and nothing was being accounted for". Although the original beneficiaries of leakages from official stocks during this period would usually have been those with strong connections to factory managers, the Communist party and its institutions, the weapons may now be widely dispersed among the population. The extent that these weapons enter the black market is difficult to judge.

1.3 Legal SALW production

Bulgarian defence facilities have traditionally manufactured a range of civilian and military SALW, including handguns, assault rifles, mortars, mines, rocket launchers as well as explosives and ammunition. In 2004, Bulgaria's SALW production remains a significant component of a defence industry, which continues to produce a range of weapons, munitions and military equipment, ranging from armoured personnel carriers to communication equipment. Following the contraction of the country's traditional markets in the 1990s, however, the SALW industry is much reduced compared to the 1980s when the defence industry employed over 100,000 people and exports were at least ten times their current levels. Estimated at US\$ 60m for 2002, the value of today's SALW production is a tiny fraction of the country's US\$ 20bn economy.

The companies that retain a SALW or ammunition production capacity in contemporary Bulgaria include Arsenal, VMZ, Arcus, Dunarit, EMCO, NITI and two branches of the MoD TEREM Company in Veliko Tarnovo and Kostenetz.⁹⁴ Of these, only Arcus, Arsenal and VMZ are truly active in weapons production. Several firms retain the capacity to

⁹⁰ Mol Press Release, 25 February 2004; 24 Chassa, 26 February 2004.

⁹¹ Source: Customs Agency, MoF.

⁹² Kiss, October 2004, p16.

⁹³ The GDP data is from the MoE, http://www.mi.government.bg.

⁹⁴ NITI stands for, 'Science, Research, and Technology Engineering'.



produce SALW but are not actively doing so. Although it is difficult to determine what proportion of the country's remaining SALW production capability is still in use, many production lines are inactive for long periods until orders arrive. Because of this, production companies are not thought to retain significant stocks of weapons.⁹⁵ Ammunition producers aside, the only three significant SALW producers at the present time appear to be Arcus, Arsenal and VMZ.

The state-owned VMZ (Sopot) is among the largest 100 companies in Bulgaria, but also one of the least successful. Fe The company has been running at a loss for the past three years, during which time its losses have risen from US\$ 15m in 2001 to US\$ 45m in 2003. The government has written off about US\$ 8m in debt and extended the repayment period for further debts EU 27m by an extra ten years in an attempt to make VMZ more attractive to privatisation, expected some time in 2005. The company produces a range of artillery and aviation ammunition, man-portable (Stinger-type) anti-aircraft missile systems (MANPADS), and RPG systems. The production of MANPADS has apparently been halted for the time being following pressure from foreign governments. Peportedly, the company has been working mainly on India-bound production, but mainly of ammunition. VMZ's production capacities are huge. The company has two active facilities in the towns of Sopot and Iganovo, five other facilities that are now unused, and another five large storage facilities in and around Sopot. Since VMZ is located far from major cities and highways, privatisation has proved difficult. Meanwhile, communities located near production facilities remain heavily dependent on the firm. In 2004 the company laid off around 400 workers, bringing the number of employed in the company to around 3,880.

The privatised firm Arcus is the most financially stable SALW producer in the country, and has managed to make a profit. Its product range has doubled to about 60 items, about half of which are SALW-related. They include ammunition for Kalashnikov assault rifles, semi-automatic weapons, grenade launchers and mortars. ¹⁰³ In 2002 the value of its production grew to a ten-year high of EU 30m. ¹⁰⁴ It has recently invested in the construction of an ammunition disposal and recycling facility. The company is also certified for export to NATO countries; its products are exported to five NATO-member countries, to Asia and the Middle East. ¹⁰⁵

Arsenal, which in 2004 expected revenues of US\$ 45m, remains the biggest SALW producer. Arsenal's exports rank it among the top 20 exporting companies in Bulgaria. Arsenal is the only Bulgarian producer of Kalashnikov-class assault rifles, under its own brand 'Arsenal' (AR) (5.45, 5.56, 7.62 mm). The AR assault rifles were originally produced as licensed Kalashnikov assault rifles and the design subsequently altered. The production of these and other products is a matter of concern to Russian defence companies and to the Russian government. In addition, the company produces pistols and ammunition for firearms and mortars. A traditional, and sometimes controversial, customer of the company has been the Indian government (see section 1.4). The company is the Bulgarian Armed Forces' main supplier of NATO-compatible 5.56 mm assault rifles and the main source of hand-guns and small automatic weapons (eg Shipka submachine-guns). In May 2004, the visit of the Nigerian Defence Minister to Arsenal in Kazanlak raised hopes for future exports. In 2004, the company announced that

⁹⁵ Interview with Arsenal workers following FGD, Kazanlak, October, 2004.

⁹⁶ Capital, 24 January 2003.

⁹⁷ Privatisation agency, http://www.priv.government.bg, accessed 16 December 2004.

⁹⁸ MoD, Defence Industrial Co-operation, 2003, p 74.

⁹⁹ Interview with VMZ management at 'Hemus 2004' – the 6th International exhibition of defence equipment, Plovdiv, 26 – 29 May 2004.

¹⁰⁰ Trud, 02 December 2002.

¹⁰¹ According to the Bulgarian Privatisation Agency, VMZ's capacity by production groups is as follows: field artillery ammunition, 40,000 rounds per year; assault weapons, 200,000 units per year; spare parts 120,000 pieces per year. Source: Bulgarian Privatisation Agency, http://www.priv.government.bg/cgi-bin/ap/03/031/loader.cgi?k=14, accessed 17 December 2004.

¹⁰² Telephone interview with representative of the Podkrepa trade union in Karlovo, 02 December 2004.

¹⁰³ A full list of Arcus Co. products is provided at the company's website, http://www.arcus-bg.com/>.

¹⁰⁴ Pari, 10 January 2003.

¹⁰⁵ Trud, 09 January 2003.

¹⁰⁶ A full list of Arsenal's products could be found on its website, http://www.arsenal-bg.com/defence.htm.

¹⁰⁷ Dnevnik, 12 June 2003.

^{108 &}lt;www.mediapool.bg>, 0-2 October 2003.



it would be supplying the new Iraqi army with SALW. 108

In addition to these three firms, there are others that retain a capacity to produce SALW but that either no longer do so, or that manufacture intermittently to order. They include EMCO, NITI, Samel and some TEREM factories. For example Samel-90 advertises MANPADS on its website as part of its product catalogue but appears not to produce or export. EMCO is in a similar position having recently purchased the mortar production unit of the bankrupt PIMA company in Montana.¹⁰⁹ NITI, based in Kazanlak, is the former research and development branch of Arsenal. After Arsenal's privatisation, NITI remained a separate state-owned company. It produces a small range of SALW, including the SPS hand gun, the Mazalat hunting rifle, a barrel adaptor for the Makarov handgun, some small arms ammunition and anti-tank mines. In addition the company produces a range of artillery ammunition. Not much is known about NITI's exports but, given the company's small production capacity and facilities, its SALW exports are probably insignificant.

Two more companies, Opticoelectron and OMZ JSC produce sights and optical parts for SALW. Two branches of the MoD-owned TEREM company, in Veliko Tarnovo and in Kostenetz also produce very small numbers of SALW. The Veliko Tarnovo branch produces spare parts and repairs small arms. The Kostenetz branch repairs rifle and mortar ammunition. It also produces a number of training and smoke grenades, as well as several types of explosives. Not much is known about the exports of either branch, or their production capacity. Dunarit (Ruse) produces light weapon ammunition, but its financial situation has been so bad that in November 2004 the Privatisation Agency was unable to find a buyer – not for the first time. 110

The output of individual companies producing SALW is difficult to estimate from open sources, since, except for Arcus (Lyaskovetz) and Arsenal (Kazanlak), all other companies produce a wide range of other defence or civilian products. Estimates are nevertheless provided below in Table 17.

Only around 25,000 individuals are now directly involved in the defence industry and only 13,500 work in companies that either produce SALW and components, or have the capacity to do so. 111 Only between 8,000–9,000 are actually involved in the direct production of SALW, and many of these only work when large orders come in and are paid irregularly. 112 The decline has had a marked effect in towns like Kazanlak, Karlovo, Sopot and Lyaskovetz which have long been dependent on defence factories for employment. 113 According to industry sources, employment at Arsenal in Kazanlak, a city of 81,000, fell from 25,000 to about 4,300 during the 1990s. 114 Interviews with employees indicate that until early 2004, when contracts for Iraq were signed, staff were often sent home for weeks without work, receiving only the state-mandated minimum salary of EU 50 per month. In recent years (1995–2001) the municipalities of Kazanlak, Karlovo and Lyaskovets have seen a partial reversal of the general trend towards increased lay-offs, but the increase remains small in comparison to previous levels of employment.

¹⁰⁹ Pari, 19 May, 2004.

¹¹⁰ Dnevnik, 02 December, 2004.

¹¹¹ Gounev et al, p18.

¹¹² Personal communication with Bojidar Penchev, MoE, 02 December 2004; and interviews with industry representatives, 25 September 2003.

¹¹³ Ibid, p 11.

¹¹⁴ Interviews with industry representatives in Sofia, 25 September 2003.



COMPANY	% STATE OWNERSHIP	NUMBER OF EMPLOYEES	TYPE OF SALW PRODUCED	TOTAL REVENUES (\$ MILLION)	% PRODUCTION DEVOTED TO SALW	SALW PRODUCTION 2004 (\$ MILLION)
Arsenal	35.8 (Ministry of Economy)	4,465	A full range of civilian and military small arms and ammunition; a wide range of light weapons and ammunition	45.0 ¹¹⁵ (2004)	75 ¹¹⁶	33.7
NITI	100	163	Small arms (hand gun -SPS, hunting rifle- Mazalat), anti-tank mines, rubber bullets	0.9 (2001)	UNKNOWN (probably under 50%)	UNKNOWN
Arcus	0	3,000	Pistols, revolvers, fuses for light weapons ammunition, ammunition for small arms and for light weapons.	32.2 ¹¹⁷ (est. 2004)	90	24
VMZ	100 (Ministry of Economy)	3880	Artillery and light weapons ammunition, RPG launchers, MANPADS ¹¹⁸	22.3 (2001)	UNKNOWN (probably under 50%)	UNKNOWN
Dunarit	100 (Ministry of Economy)	700	Artillery ammunition: 82 mm; 57 mm air-defence ammunition; 81 mm mortar ammunition	6.2 (2002)	UNKNOWN (probably under 50%)	UNKNOWN
Optiko-electron	0	786	Sights for small arms and for light weapons	2.5 (2002)	UNKNOWN	UNKNOWN
TEREM-Veliko Tarnovo Branch	100 (Ministry of Defence) ¹¹⁹	383	Hunting rifle 7.62 calibre, spare parts for small arms,	2.7 (2003)	UNKNOWN	UNKNOWN
TEREM- Kostenetz	100 (Ministry of Defence)	118	Repair of light weapons and small arms ammunition. Manufacture of smoke grenades.	1.6 (2003)	UNKNOWN	UNKNOWN
Bendida 99	0	c 20	Hunting arms ammunition	0.2	100	UNKNOWN
Ripelon	0	c 20	Hunting arms ammunition	0.3	100	UNKNOWN

Table 17: SALW Producers. 120

1.3.1 Privatisation, reorientation and conversion

Attempts to reorganise Bulgaria's defence industry have been dominated by the need to stem the inevitable social and economic impact of the industry's contraction. Privatisation, though well advanced, has not been successful at turning around the industry's fortunes. Neither the state nor defence firms can afford to invest in the research and development (R&D) needed to produce high-technology weapons and thus they resort to producing low technology goods such as SALW. As a percentage of the defence budget (0.36–0.39 percent or EU 1.5 – 1.6m), R&D spending is well below Western-European averages of 1.2 – 2.0 percent. The brain drain that continues to affect the whole country has not helped either, with skilled specialists easily lured to betterpaid positions abroad. This leads to a dependency on SALW production, which involves simpler technology and export. According to some publications, most of the companies are hardly breaking even. It has lost many of its long-standing trading partners and has missed several opportunities for conversion. Some of its production facilities have been sold off.

¹¹⁵ Sega, 12 October, 2004.

¹¹⁶ Telephone interview with Nikolai Ibushev, 15 October 2004.

¹¹⁷ Dnevnik, 30 April, 2004.

¹¹⁸ The company has ceased production of MANPADS for the time being due to the risks that these weapons pose – interview with company employee, 26 May 2004.

¹¹⁹ On 08 October 2004 the Bulgarian Privatisation Agency opened an official privatisation process for all branches of the TEREM company, including the Kostenetz and the Veliko Tarnovo branches.

¹²⁰ Sources: MoD, 'Defence Industrial Co-operation', (Sofia 2003), pp 53–75, Financial data for NITI, Dunarit, TEREM-Veliko Tarnovo, TEREM Kostenetz and VMZ is taken from the official website of the Bulgarian Privatisation Agency http://www.priv.government.bg; information on Bendida and Ripelon is based on National Statistical Institute data.

¹²¹ MoD, 2003, p12.

¹²² Bialos, July 2001, p 12.



Conversion attempts have been affected by a lack of investment capabilities, resources and technical expertise. It has also proven difficult to adjust defence-orientated production lines to civilian use. ¹²³ In addition, during conversion initiatives the government often showed indecision by maintaining production of both defence-related and civilian goods simultaneously in one factory. By attempting to preserve defence production capacities in this way, factory managers were provided with an alternative to new civilian lines of production and often chose to concentrate on producing more profitable defence-related items. ¹²⁴ Ultimately, most conversion initiatives have failed because interventions were undertaken at the individual factory level rather across the industry in line with any over-arching plan. ¹²⁵

Privatisation's implications with respect to the arms transfer control process have been mixed. A key consideration in this is the creation of numerous small companies. On the one hand, most newer companies have already faced up to the fierce global competition of an international market that is characterised by giant mergers, sophisticated technology and expertise and abundant resources. Many of them are partnering with larger foreign firms and have moved away from the old shrinking markets whose destinations became less and less acceptable as the country's arms export control standards gradually improved from the late 1990s onwards. But the new shape of the defence industry has also created challenges for government agencies tasked with overseeing their conduct. According to one observer of the arms transfer control process, the proliferation of new traders has increased the likelihood of illicit deals going undetected, because unscrupulous dealers almost inevitably find it easier to operate when the state has a large number of companies to deal with.¹²⁶ While critics of public ownership have rightly raised concerns about the possible conflicts of interest that may arise when government ministers appoint defence industry executives and board members (see Box 5), it should also be recognised that in some respects at least this practice makes oversight of industry easier. Once firms are entirely in private hands, the capacity of regulatory authorities must be increased in order for firms to be monitored and investigated adequately.

Box 5: 'Expert Group' concerns over conflicts of interest. 127

Three government ministries that are responsible for examining export licence applications within the Interdepartmental Commission on Export Control and Non-Proliferation of Weapons of Mass Destruction also own production facilities – the Mol, MoD and Ministry of Economy (MoE). A Center for the Study of Democracy (CSD)/Saferworld report in 2003, Weapons Under Scrutiny, raised the question of whether this dual role constitutes a structural conflict of interest, making undue business influence over licensing decisions a possibility.

The MoE has majority stakes in two of the country's biggest arms trading company, Kintex and also in a smaller broker, Teraton. In addition it has full ownership of the defence production companies VMZ, Dunarit and NITI and minority shares in Arsenal and some other defence companies. The Ministry appoints the boards of the companies where it has majority stakes and has representatives on the boards of the companies where it has minority stakes. Previous MoE representatives on the Interdepartmental Commission have also held positions on the boards of these defence companies. The MoI situation is similar, though its holdings are far smaller and limited to Contactless Multiplexing Systems (CMS), which is involved in the small arms trade. The MoD holds controlling shares in TEREM and Procurement & Trade (responsible for selling MoD surpluses).

The effects of privatisation on internal SALW proliferation have also been mixed. During the chaotic early years of the process, SALW are believed to have been smuggled out of factories in significant numbers (see Section 1.2.2.3). Illegal craft production of weapons by former factory workers is also partly connected to the privatisation process, albeit as one element of broader downsizing of the defence sector. Where it succeeds, privatisation will have its benefits insofar as it provides factory workers with alternative livelihoods, and leads to diversification and/or conversion of SALW production lines. For the benefits to be maximised, however, the remaining privatisation of the sector will have to be handled with greater consistency than has previously been the case. Fortunately, more recent privatisations, like Terem's have attracted the interest of foreign investors for the first time. The relative success of Arcus and Arsenal in finding new markets and remaining soluble compared to state-owned VMZ and

¹²³ BICC, 2001, p 68.

¹²⁴ Gounev et al, p 20.

¹²⁵ Gonchar, p 75.

¹²⁶ Interview, Lowder, 2004.

¹²⁷ Source: Gounev et al, p 53.



NITI, and the growing number of ammunition-producing firms, does illustrate that certain sectors of the industry are able to operate in a competitive market environment.

1.4 SALW transfers

According to a public statement by the Deputy Minister of Economy, Bulgaria's total arms exports for 2003 were worth EU 90m. ¹²⁸ Government officials have previously stated that the country's SALW exports earned US\$ 30m in 2002, ¹²⁹ which, judged by global standards, makes Bulgaria a small player in the estimated US\$ 4bn annual world market for SALW. ¹³⁰ The only two companies known to be exporting small arms, including ammunition, at the present time, are Arsenal and Arcus. In 2004 the total revenues of the two companies is projected to be US\$ 75m. This is significantly higher than the 2003 figure of US\$ 29.2m. According to its Chief Executive Officer, Arsenal is currently trading with 80 countries on five continents. ¹³¹ Media reports indicate that Arcus has 112 trading partners in 75 countries. ¹³²

COMPANY	2004	2003	2002	2001	2000
Arsenal 133	33.7	25.0	N/A	40.7	25.6
Arcus 134	24.0	11.4	N/A	12.7	10.4
VMZ ¹³⁵	N/A	N/A	N/A	22.0	13.5

Table 18: Estimated SALW exports (US\$ million).

In lieu of a publicly available national arms export report, data from public sources such as the United Nations Commodity Trade Statistics Database (COMTRADE), media reports and arms exports published by foreign governments offer a glimpse into the wide spectrum of Bulgarian SALW exports. Some of the largest publicly known exports are presented in the table below, while more comprehensive lists of imports and exports, compiled from publicly available sources, are provided in Annexes E and F.

YEAR	COUNTRY	соммодіту	VALUE (US\$)
2001	FYR of Macedonia	Cartridges nes, parts thereof (930630)	2,200,400
2001	Saudi Arabia	Cartridges, shotgun (930621)	12,356,438
2002	Colombia	Munitions of war, ammunition/projectiles and parts (930690)	2,191,896
2002	Indonesia	Munitions of war, ammunition/projectiles and parts (930690)	1,260,586
2002	Poland	Munitions of war, ammunition/projectiles and parts (930690)	884,000
2003	Colombia	Munitions of war, ammunition/projectiles and parts (930690)	1,641,039
2003	Georgia	Munitions of war, ammunition/projectiles and parts (930690)	1,144,383
2003	Germany	Parts and accessories of shotguns or rifles, nes (930529)	1,081,000
2003	Poland	Munitions of war, ammunition/projectiles and parts (930690)	3,194,000
2003	USA	Multiple SALW and SALW ammunition	1,372,451

Table 19: Largest known SALW exports from Bulgaria (2001–2003).

¹²⁸ Monitor, 23 August 2004.

¹²⁹ Hirst et al, 2003, p 71. Reference to interviews with government officials, 5 October 2003.

¹³⁰ The Small Arms Survey estimates the global value and volume of small arms production for the year 2000 at US\$ 7.4bn (SAS, 2002, p 15). This figure includes military small arms, commercial firearms and ammunition for both of these. This estimate is presented as a 'very tentative' approximation, and has not been improved upon in subsequent yearbooks. See also SAS, 2003, p 97.

¹³¹ Ibushev N, 15 October 2004.

¹³² Dnevnik, 30 April 2004.

 $^{^{133}}$ lbushev N, 15 October 2004. Estimates for other years assume 25% civilian production and virtually 100% export of arms production.

¹³⁴ Dnevnik, 30 April 2004. Estimates for other years assume 20% civilian production and virtually 100% export of arms production.

¹³⁵ Privatisation Agency, http://www.priv.government.bg



Some of the biggest trading partners, though, such as India or Middle Eastern countries like Iraq and Jordan have not been listed. Following the wars in Afghanistan and Iraq, Bulgarian exports, particularly to Iraq, provided a significant boost for the country's SALW industry. The USA itself is becoming a big trading partner. As well as being a major supplier to the new Iraqi Army and Police, Arsenal has now become a subcontractor for the US firm General Dynamics, has announced a deal with major Hollywood studios to produce ammunition for films. According to a former member of the Interdepartmental Commission, sales of ammunition now account for around half of all Bulgaria's SALW exports, 337 a claim supported by the publicly available data on weapons and ammunition sales sourced during the research (see Annex E).

Box 6: New contracts with Afghanistan 138

In May 2004, the Bulgarian Government announced it had concluded a deal to supply the Afghan Government with US\$ 10m worth of military aid, including SALW:

- 9,499 rounds of anti-tank anti-personnel carrier ammunition.
- 94 heavy tank-mountable machine-guns.
- 242, 880 rounds of SALW ammunition.
- 410 pairs of binoculars.
- 55 62 tank-repair kits.
- 86 medical and 50 surgery kits.
- 20 000 rounds of artillery ammunition D-30.
- 500 heavy machine-guns with accessories.
- 790 9 mm Makarov pistols.

1.4.1 Brokered transfers

Many of the above companies' arms export deals are concluded with the help of brokers who trade internationally in arms and dual-use goods and technologies (ADGT). A list of all companies licensed to broker ADGT in foreign markets can be obtained from the Interministerial Council (see Annex D for the most recent list). As of June 2004 ten companies were listed as having full licences to broker arms, three as having limited licences and two as licensed only to broker in dual-use goods and technologies. Only one of the listed companies is based in Bulgaria – Aheloy OMP of Sofia. The twelve others are based variously in Cyprus, South Africa, Israel, St. Kitts and Nevis, Ukraine, Norway and the British Virgin Islands.

One well-known international broker that currently facilitates transfers of Bulgarian-made weapons is Imperial Defence Services Ltd, based in the United Kingdom (UK). The company's online sales catalogue offers over twenty types of rifles, machine-guns, machine-pistols and ammunition, including the Bulgarian-made Shipka 9x18 machine-pistol, which are provided via, "...offices or agents in Bulgaria, Cyprus, Nigeria, Australia, South Africa and Vietnam." The company is known to have been trading at least up until February 2003 when it made a written offer to supply 200 rifles at US\$ 275 each through its Bulgarian office for a proposed shipment to Syria. 140

Probably the best-known national broker trading in SALW is Kintex, the state-owned company licensed to broker in ADGT.¹⁴¹ Because of previous allegations that it has carried out illegal deals (eg the company was alleged to have armed Saddam Hussein's Iraq while a UN embargo was in place) Kintex's reputation has suffered. In April 2004 the company also became caught up in accusations levelled at the Indian Government which had contracted Kintex in a multi-million dollar deal to supply the Indian Army with AK-47 rifles. The Indian Government

¹³⁶ Sega, 10 December 2004.

¹³⁷ Interviews, Genov, November 2003.

¹³⁸ Council of Ministers, 13 May 2004.

¹³⁹ Imperial Defence System website, http://www.imperialdefence.co.uk/defence_equipment.htm, and http://www.imperialdefence.co.uk/defence_equipment.htm, accessed on 22 November and 01 December 2004.

¹⁴⁰ Observer, 27 April, 2003.

¹⁴¹ See http://www.bmv.online.bg/eng/index_en.htm, accessed 22 November 2004.



had rejected a tender from Russia's Rosoboronexport-Izhmash consortium, despite Rosoboronexport having submitted a bid 25 percent cheaper than Kintex's. 142

A number of companies have recently become involved in the lucrative brokering business. CMS is owned by the Mol. It has been trading in small arms since January 2002 and now runs a chain of firearms stores and a firearms repair shop. Prior to that it was the main importer of arms and equipment for the Mol.

1.4.2 Transport companies and transhipments

As of July 2004, the Interministerial Council's list of transport companies licensed to trade in ADGT contained named four companies: Aviostart, Bright Aviation, Vega Airlines and Videx (see Annex D). While the first three are airlines, Videx provides ground transportation services. In addition, there are two other aviation companies that have been known to transport arms in the recent past but currently do not hold arms transport licences – Air Sofia and Zori Air Company (formerly Air Zori).

Founded in 1998, **Vega Airlines** has six aircraft. It flies to all continents and is one of the few Bulgarian companies licensed to fly in the USA and Canada. The company is also attempting to gain accreditation with the UN World Food Program. Vega Airlines successfully performs cargo charter flights around the globe and has established a good reputation providing services to countries such as Australia, Brazil, Canada, Honduras, Singapore, Indonesia, Malaysia and India. Most of its business, however, is conducted in Europe and Africa. ¹⁴³

Aviostart, founded in 1999, specialises in charter flights. The company was contracted to serve the Bulgarian military contingent in Afghanistan. It also works in the Balkans transporting UN and KFOR staff and cargo. The company boasts experience in flying AN-12, AN-24 and II-76 flights to European, African and Asian destinations where it has long-term contracts. The company also transports humanitarian aid. Aviostart represents a number of large Ukrainian aviation companies in the Balkans, Europe and Africa. 144

Bright Aviation is a privately owned company, founded in 2001. It operates three AN-12 aircraft. ¹⁴⁵ It was subject to unwelcome media attention in 2003 when its AN-12 plane was briefly apprehended in Belgrade on suspicion of transporting arms illegally. The aircraft was subsequently permitted to fly once the authorities concluded that the cargo was regular delivery of ten tons of Serbian arms and ammunition to the Kenyan Police.

Videx is both a producer of explosives and a transport company. The company has a trading licence for SALW but its primary activities are related to explosives, a large part of which are for civilian use. The company transports its products both within the country and across the Balkan region.

Air Sofia, founded in the 1990s as CG Air, was the most aggressive Bulgarian transport company during the embargo against the former Yugoslavia. At present the fleet consists of six AN-12, two IL-76, one AN-26 and one AN-124 aircraft. It operates scheduled and *ad hoc* flights worldwide. The head office and maintenance base are located in Sofia but the firm has marketing divisions in London (Gatwick), Singapore, Dubai and Cotonou. As many as 400 people work for the company – pilots, technical and maintenance staff. The company has

¹⁴² Balkanalysis.com, 26 April 2004.

^{143 &}lt;http://www.vegaair.com/>

^{144 &}lt;a href="http://www.aviostart.com">http://www.aviostart.com , accessed 24 October 2004.

¹⁴⁵ http://www.videx.bg, accessed 22 November 2004; Standard, 20 February 2003; http://www.videx.bg, accessed 22 November 2004; http://www.airsofia.com, accessed 22 November 2004.

¹⁴⁶ One report suggests that during the embargo on the former Yugoslavia, Air Sofia undertook risky flights to Podgorica and Belgrade. At that time the company operated AN-12 cargo planes. Bulgarian intelligence sources have also stated that in 1994 Air Sofia also transported rocket-launchers from North Korea to Pakistan. See Dimitrova Z, 'The Business with Death and the Yugoembargo', http://investigation-bg.org/show.php?id=67. Air Sofia also featured in a report by the US-based NGO, Human Rights Watch (HRW), which cited a shipment made on 9 April 1995, where an Air Sofia plane was detained in Cape Verde after one hundred tons of weapons were discovered on board during a stop-over. The flight was *en route* to Ecuador at the time of a border war with Peru. In this case the aircraft was not carrying Bulgarian weapons and it did not transit through Bulgarian territory. Instead the shipment was believed to have begun its journey in Belarus. See HRW, April 1999.



previously featured in media and research reports concerning the transfer of arms to sensitive destinations. 146

Air Zori was founded in 1994 and was issued a licence to transport special products in 1995. As of 31 August 1998 the company is no longer licensed to transport military products. Although, the company was declared bankrupt in 2001, some of the same individuals became involved in a new company, Zori Air Company, about which little is known. Air Zori is, however, known to have delivered arms to the Middle East and Africa and has also attracted the attention of the Bulgarian news media. 147

At the time of research none of the big state-owned transport companies, Bulgaria Air, Bulgarian Maritime Company and Bulgaria State Railways were listed as licensees, despite their routine involvement in transporting ADGT.¹⁴⁸ Other omissions on the list of registered companies appear to include numerous firms that provide road-haulage, forwarding, financial and consulting services to facilitate transfers of ADGT.

1.4.3 Transfers of concern

During the 1990s, there were frequent accusations that official exports of Bulgarian SALW had found their way to countries in conflict, or regions of instability, often with the help of international brokers via circuitous routes. The list of sensitive destinations to which Bulgarian SALW were exported includes a number of war-torn African countries such as Angola (1996–1998), Rwanda, the Democratic Republic of Congo (1999), Uganda, Sierra Leone (1998) and Burundi. The transactions in question constituted a sufficiently grave infringement of international arms control norms that they came to the attention of the Bulgarian media, the international NGOs, and a UN Panel of Experts.¹⁴⁹

Nowadays the Bulgarian Government is publicly committed to upholding a "...consistent and responsible policy of export controls." This commitment has been reinforced periodically by government officials in different international fora. Among government officials, the introduction of the amended LCFTADGT in July 2002 is seen as having crystallised the government's avowed commitment to a responsible arms transfer policy by introducing an advanced regulatory framework. Many of the changes incorporated into the new law meet recommendations made by international observers, including the introduction of controls on the activities of both Bulgarian and international arms brokers, and a renewed emphasis on the requirement for transfers to comply with international standards on arms transfers so as to prevent the transfer of weapons to sensitive destinations.

The occurrence of large-scale (official) illicit SALW transfers appears to be a thing of the past, leading a recent study of the Bulgarian export control system to state that "in the past two years no cases of significant illicit trade in SALW have been detected." ¹⁵³ Unfortunately though, accusations that Bulgarian arms transfers are helping to fuel conflicts and that the government is not abiding by international commitments have continued to surface. In February 2004, Bolivian media reported that military intelligence had launched an investigation into possible arms imports including sub-machine-guns and AK-47s produced in Bulgaria. The arms were allegedly transported into Bolivia through Peru for use by terror groups who had carried out several attacks on policemen and soldiers. ¹⁵⁴ Media reports also indicate that an export licence was issued in August 2004 for the sale of 2,500 boxes of mortar shells to Georgia, despite there being a number of unresolved internal conflicts in that

¹⁴⁷ Op cit, Dimitrova.

¹⁴⁸ For example in April 2004, a Bulgarian Maritime Company ship carrying Bulgarian-made hunting rifles was briefly detained in Istanbul while en route to Hamburg, Germany. *Dnevnik*, 29 April 2004.

¹⁴⁹ HRW, April 1999.

¹⁵⁰ Passy, 2002.

¹⁵¹ Takev, 2001.

¹⁵² Interview, Stoeva, 23 September 2004.

¹⁵³ Gounev et al, Chapter 3.

¹⁵⁴ Novinite, 23 February 2003.

¹⁵⁵ Novinite, 06 August 2004; BNN, 07 August 2004.

¹⁵⁶ BBC, 12 August 2004.



country at the present time. ¹⁵⁵ The Interministerial Commission publicly stated that export licences to Georgia were in full compliance with international procedures and requirements for ascertaining the end user. ¹⁵⁶

A review of publicly available information on Bulgaria's recent SALW exports (see Annex E) reveals that exports have gone to a number of destinations of potential concern. The potentially problematic destinations listed for the 2001 – 2003 period include Colombia, Georgia, Guatemala, India, Indonesia, Macedonia, the Russian Federation, Turkey and Saudi Arabia. Each of these destinations may be considered sensitive and potentially problematic in the light of the eight export criteria stipulated by the EU Code of Conduct, to which Bulgaria is aligned. It should be stressed, however, that in the absence of more detailed information as to the types of weapons transferred and the end-use guarantees received, these cases are only of potential concern. It is to be hoped that the Bulgarian Government's forthcoming arms export report will shed further light on these cases.

1.4.4 SALW imports and internal trade

Bulgaria's legal internal arms trade takes place in 269 designated gun stores around the country. There are some indications that the bulk of legally imported SALW go to the civilian market. All regional capitals have gun stores, but the large majority are located in the main population centres: Sofia (53 shops), Plovdiv (22), Burgas (17), Pleven (15), Haskovo (13) and Varna, Veliko Tarnovo and Dobrich (each of which has 2).157 The main commercial importers of civilian firearms are the Bulgarian trading companies Beretta Trading and Star Force. According to gun shop owners interviewed during the research, the most popular guns they stock are all imported: Beretta (Italy), Browning (USA), Remington (USA), Walter (USA), Smith & Wesson (USA), Colt, CZ 75 B Compact (Czech), and Glock (Austria). Among hunters, Russian and Turkish-made rifles are the most popular. 158 Shop-keepers estimate that about 70 percent of their sales are for items between US\$ 500 and US\$ 800. The most expensive class of firearms on sale cost US\$ 1,250 and above. Approximately 20 percent of sales are of domestically produced brands that retail between US\$ 100 and US\$ 300. Based on the growth in registered firearms the legal domestic small arms market in 2003 could be estimated as being worth US\$ 3.8m to US\$ 5.7m. Since many weapon owners choose to purchase new or more expensive weapons when they can afford it, the market may be even larger than these figures suggest. On the basis of these figures however, imports would be worth an additional US\$ 3.04m to US\$ 4.56m per annum. 159 Interviewees from the MoD suggest that imports are somewhat higher than domestic demand, and that many gun shops are holding large inventories. 160 The large network of gun stores suggests that there are probably around over 40,000 small arms in stock with a significant amount of this being inventory from previous years (see Section 1.1.1 for further details).

Since the law on weapons possession was first liberalised in 1998, the number of newly registered weapons has, however, gradually been decreasing, an indication that the market is tending towards saturation.¹⁶¹

YEAR	1999	2000	2001	2002	2003
Newly registered arms	24,072	45,653	30,518	20,211	7,467

Table 20: Newly registered firearms (1999 - 2003). 162

Aside from the general public's demand for imported SALW, there are other possible demand drivers that could be stimulating imports. Firstly, there is the question of imports for use by Bulgarian security services. Although the main security agencies actually have surplus stocks of SALW, which would indicate that they have no need to import regular weapons, security forces require high-specification weapons for special operations (eg close protection), which will often need to be imported. Secondly, it is likely that a proportion of imported SALW are

¹⁵⁷ NPS data as of 30 June 2004.

¹⁵⁸ Interviews with various gun-shop owners during September 2004.

¹⁵⁹ Judged against these figures the import data included in Annex F for 2003 appears quite comprehensive.

¹⁶⁰ Comments by Yordan Bozhilov, International Organisations & Arms Control, Ministry of Defence, at Bulgarian Red Cross seminar on Non-Proliferation of SALW, 03 – 04 November 2004, Sofia.

¹⁶¹ Capital, 22 October 2004.

¹⁶² Source: Based on data from Mol, NPS.



actually re-exported at some future date, possibly after repair or upgrading. In the absence of a detailed official report on Bulgarian arms exports and imports, it is not possible to say what fraction of the weapons identified in Annex F have been re-exported, or to identify any trends.

2 Small Arms Impact Survey (SAIS)

2.1 Firearms injuries

The research team sought information on firearm injuries from a number of different sources in order to measure the impact of SALW on public health, including hospital and police records and media reports. Of all these sources, figures held by the NSI (compiled using information provided by municipal authorities) proved the most useful. A review of media reports of firearms injuries revealed little new information since the media rely heavily on official police statements.

Record keeping and information sharing within the public health system itself is patchy at best and no reliable data on firearm injuries could be recovered from hospital records. When hospitals receive a patient with a gunshot wound, the case is recorded only in terms of the physical injury sustained, eg 'fracture', or 'torn ligament'.¹⁶³ However, most (though not all) hospitals have a police officer on 24 hour duty, to whom all firearm-related injuries incidents are to be reported. When this happens, the police record the case and categorise it as either fatal, nonfatal, or suicide (neither the police or NSI offer a breakdown of recorded firearm injuries by the type of physical injury). Interviews with medical staff suggested one reason why police data may be less complete than NSI data – there may be occasions when the patient himself prefers not to involve the police, possibly because the injury is related to a criminal act. Provided he or she can convince the hospital staff and duty police officer not to make a report, (eg by offering a bribe), the incident will go unrecorded. A final reason may be that suicides by military personnel are recorded by the NSI but not the police, because they come under the jurisdiction of the military rather than civilian police.¹⁶⁴



Photo 8: Gun safes on display at a trade fair in Sofia, September 2004.

2.1.1 Non-fatal injuries

According to police data, during 2003 the police registered 42 accidental firearm injuries. The larger part of them (27) were inflicted with legally owned arms and 15 with illegal ones. In addition, there were 35 firearm injuries that were classified as criminal acts, of which 19 were committed with registered weapons, and the other 16 with illegal ones. It is not clear from the available data what part of the accidental injuries were self-inflicted. From Table 21 one can see that after an increase between 1999 and 2001, non-fatal firearms injury rates have fallen back to their 1999 levels. It is interesting to note that despite the increasing number of registered weapons available within the country, the occurrence of firearm injuries has not increased proportionally. One possible explanation is that the mandatory firearm-handling training courses which all registered firearm users have to pass and the storage precautions they are required to take, are paying dividends. The research team attempted to find out to what extent the laws on domestic weapons storage are followed but could not reach any firm conclusions on the basis of the information available. While HHS respondents appeared well aware of safe storage practices (see Section 3.3), interviews with weapon owners indicated that many are not equipped with metal safes. 165

 $^{^{163}}$ Telephone interviews with hospital staff, see Annex G.

¹⁶⁴ Sega, 24 January 2004.

¹⁶⁵ Interviews with weapon owners September - November 2004.