

To the Academic Jury for the Defense of a  
Dissertation for the Acquisition of the  
Educational and Scientific Degree  
PhD in the Field of Higher Education  
3. Social, Economic and Legal Sciences  
Professional Field: 3.6. Law

## **REVIEW**

of a dissertation for the acquisition of the educational and scientific degree PhD  
in the field of higher education: 3. Social, Economic and Legal Sciences  
Professional Field: 3.6. Law  
(PhD program "Theory of State and Law")  
Plovdiv University "Paisii Hilendarski"  
Law Faculty, Department of "Theory and History of Law"  
on the topic: "Economic Impact Assessment of the Normative Legal Acts"  
submitted by the candidate Kiril Stoyanov Ilchev

### **1. Candidate Information**

Kiril Ilchev holds a Bachelor's degree in "Macroeconomics" from Plovdiv University "Paisii Hilendarski" (1999–2003). He obtained a Master's degree in "Financial Management" from the same university (2003–2004). He holds a professional qualification as an "Economist" for both educational degrees. The doctoral candidate also earned a Master's degree in "Law" (2010–2016) from Plovdiv University "Paisii Hilendarski," with a professional qualification as a "Lawyer."

From February 2005 to February 2008, he served as a Revenue Inspector at the Plovdiv Territorial Directorate of the National Revenue Agency.

Between July 2010 and February 2013, he worked as a Revenue Inspector/Junior Human Resource Management Expert in the same structural unit of the public administration.

From August 2013 to December 2020, he was employed as an Operational Accountant at "Ilchevi Consulting" Ltd. in Plovdiv.

### **2. Doctoral Program Details**

Kiril Ilchev was enrolled as a full-time PhD student in Professional Field 3.6. Law (PhD program "Theory of State and Law") in the Department of "Theory and History of Law" at the Law Faculty of Plovdiv University "Paisii Hilendarski," by order of the Rector of Plovdiv University "Paisii Hilendarski." The PhD training period was from March 2020 to February 2024. He was formally discharged with the right to defend his dissertation based on a decision by the Department of "Theory and History of Law" (Protocol No. 118/05.03.2024). He has submitted a dissertation, which was positively evaluated by his academic advisor, Prof. PhD. Yanaki Stoilov, and reviewed by the Department Council (Protocol № 29 of 17.03.2025).

Plovdiv University "Paisii Hilendarski" has initiated a procedure for the defense of the dissertation of Kiril Ilchev for the acquisition of the educational and scientific degree PhD on the topic: "Economic Impact Assessment of the Normative Legal Acts". By Order № RD-22-810/02.04.2025 of the Rector of Plovdiv University "Paisii Hilendarski," Prof. PhD. Rumen Mladenov, and pursuant to the provisions of the applicable legislation and the decision of the Faculty Council of the Law Faculty (Protocol № 129, dated 26.03.2025), the composition of the academic jury has been determined.

At the meeting held by the jury on April 17, 2025, based on Article 9, paragraph 2 of the Law on the Development of the Academic Staff in the Republic of Bulgaria (LDASRB) and the submitted report on the minimum national requirements fulfilled by the PhD candidate, it was established that Kiril Stoyanov Ilchev meets the regulatory requirements under Article 2b, paragraphs 2 and 3 of LDASRB. No evidence of plagiarism was found, and therefore he was admitted to defend his dissertation for the acquisition of the educational and scientific degree PhD.

At the same meeting, I was appointed as the reviewer of the dissertation. I found that no violations were committed during its preparation. The dissertation fully complies with the requirements of the Law on the Development of the Academic Staff in the Republic of Bulgaria, the Regulations for the Implementation of the Law on the Development of the Academic Staff in the Republic of Bulgaria, and the Regulations on the Development of the Academic Staff at Plovdiv University "Paisii Hilendarski".

### **3. Information about the Dissertation and the Abstract**

The scientific work titled "*Economic Impact Assessment of the Normative Legal Acts*" comprises 376 standard pages (277 printed pages). Structurally, it consists of an introduction, three chapters, and a conclusion. The chapters contain sections, which are marked with thematic titles and organized into numbered points using Arabic numerals. The dissertation includes a table of contents, a list of abbreviations used, and a bibliography of cited literature. The bibliography appended to the dissertation is extensive, comprising 124 titles – 75 in Cyrillic (Bulgarian language) including monographs, studies, and articles; 49 titles in Latin script (English language); and 65 additional sources. The work contains 12 tables and 2 charts. For the purposes of the study, case law from the Constitutional Court of the Republic of Bulgaria (6 decisions) and the Supreme Administrative Court (5 decisions) has been utilized. The dissertation includes 430 footnotes.

The subject of the scientific analysis is the relationship between law and economics in the context of the importance of economic impact assessment for the quality of the legislative process. The influence of this relationship on the economy forms the basis of the doctoral candidate's reasoning. His objective is to investigate the essence of economic methodology in the legislative process.

The content of the work and the conclusions drawn therein correspond to the main objective set in the scientific study — to enrich the knowledge in the doctrine regarding the concept of impact assessment and its role in legal theory. Several research goals have been clearly defined, namely:

1. Theoretical goals – to investigate the historical development and international standards in the field of impact assessment of legislative acts; the essence of the concepts of impact assessment and economic impact assessment; the theoretical and methodological aspects of this legal phenomenon; the principles and criteria according to which it is implemented, in order to evaluate its significance for legal science.

2. Analytical goals – to study the legal framework of the institute of impact assessment of legislative acts; the relationship between economic impact assessment and the effectiveness of Bulgarian legislation; as well as the economic manifestations of impact assessment and its role in improving the legal system and economic environment.
3. Methodological goals – to describe and analyze the methods and techniques for economic impact assessment used in Bulgaria, as well as the criteria and indicators for conducting effective impact assessments; and to examine best practices related to impact assessment and their application.
4. Practical-applied goals – to investigate the problems encountered in the application of economic impact assessment and to propose concrete measures for improving the efficiency of the legislative process.

The methodology employed in the development of the scientific work incorporates the characteristic methods of significant academic studies. The conclusions reached by the doctoral candidate are the result of his application of general scientific methods of inquiry: observation, description, historical-legal and comparative-legal research, scientific analysis and synthesis, as well as economic approaches to scientific research, including cost-benefit analysis, cost-effectiveness analysis, multi-criteria analysis, discounting, risk assessment, and addressing uncertainty.

The introduction substantiates the relevance of the topic from the perspective of the efficiency and quality of the legislative process. It outlines the questions addressed in the dissertation (object, subject, goals, tasks, and methodology employed) and presents its structure.

The first chapter is titled *"General Characteristics and the Concept of Impact Assessment of Legislative Acts."* It describes the emergence of the idea regarding the essence of impact assessment of legislative acts on various spheres of social life (economy, social policy, politics, demographic aspects, military affairs, etc.) and its evolution from Antiquity, through the Middle Ages and Modern Times, to its contemporary dimensions. It traces the introduction of regulatory impact assessment in the United States (USA) after the mid-20th century and in the United Kingdom after the 1980s. Special attention is given to the development of a comprehensive system to ensure the quality of legislation within the European Union (EU), culminating in the adoption of an integrated model for impact assessment of regulations and the establishment of administrative bodies responsible for compliance with the methodology. The chapter also examines national experiences in introducing this institution. The second section focuses on the primary characteristic of regulatory impact assessment (RIA): its normative nature. It discusses the legal and non-legal sources of impact assessment on legislative acts. The trends toward the dominance of soft law over hard law within the EU's legislative activities are analyzed, along with the adoption of various interaction models between hard law and soft law in the national legal systems of EU member states. The instrument of impact assessment of legislative acts is examined through the lens of methodology, the systemic and sociological approach to law, the regulatory function of law, and the principles of predictability and certainty in the legal system. The chapter concludes with a summary of the position of regulatory impact assessment within legal theory, considering various doctrinal approaches.

The second chapter, titled "Impact Assessment of Regulatory Acts in the European Union and the Republic of Bulgaria – Economic Aspects of the Mechanism, Principles and Criteria, Types, Problematic Areas, and Deficits", explores multiple dimensions of this legal phenomenon at both supranational and national levels. The first section clarifies the concepts of "good regulation," "better regulation," and "good governance" within the framework of the European Union's *Better Regulation Agenda*, and examines impact assessment as an essential

tool, including its use by the Court of Justice of the European Union to validate EU legislation. Emphasis is placed on the criteria for conducting impact assessments: efficiency, effectiveness, relevance, coherence, and EU added value, as well as commonly used additional criteria in the EU such as utility, complementarity, coordination, fairness, sustainability, and acceptability. The national framework is analyzed with its legislative standards, including necessity, justification, predictability, transparency, coherence, subsidiarity, proportionality, and stability. The second section examines the economic aspects of impact assessment, highlighting its effects on the legislative process and its surrounding environment. The third section focuses specifically on the regulation and content of economic impact assessments of regulatory acts in Bulgaria. This part also discusses the types of impact assessments. The fourth section addresses the principles, criteria, and indicators of regulatory impact assessment. It traces the procedures and stages undertaken during the assessment of the economic impact of regulatory acts. The shortcomings in the application of economic impact assessments of regulatory acts are critically discussed. Proposals are made to improve the legislation, including the standardization, optimal detailing, and unification of the methodology and requirements for conducting impact assessments; the establishment of legal accountability and consequences for non-compliance or superficial implementation of assessments; and the creation of a supervisory body to monitor the quality of the assessments.

Chapter Three is titled "Practical Aspects of Regulatory Impact Assessment." The first section provides an overview. The second section examines several methods and techniques for assessing the impact of regulatory acts, including cost-benefit analyses (CBA), cost-effectiveness analysis, multi-criteria analysis, discounting and compounding, risk and uncertainty assessment, impact assessments for small and medium-sized enterprises (SMEs), and the role of digitization and innovation in shaping regulatory impacts. The third section focuses on best practices in implementing regulatory impact assessments.

The conclusion summarizes the key issues discussed in the dissertation. The synthesis of the main findings in the final part of the thesis demonstrates a high level of applied scientific analysis and conclusions, adding an additional expert, practical, and applied dimension to the work.

Following this description of the dissertation, I allow myself to provide the following evaluation of its theoretical and scientific-applied qualities:

The originality of the dissertation presented for review "Economic Impact Assessment of the Normative Legal Acts" is indisputable. A broadly applicable yet unexplored topic in national doctrine is discussed comprehensively and with the necessary depth. The specialized educational background of the doctoral candidate enables him to focus on a detailed examination of what is arguably the most important institution in contemporary legal theory and practice. Kiril Ilchev conducts an exceptionally thorough and exhaustive analysis, considering various theoretical aspects, the historical dimensions of the emergence of the institution of impact assessment for legislative acts, and the modern legislative framework, while consistently drawing parallels with the approaches adopted for assessing the impact of legislation and regulations in the European Union.

The relevance of the topic is evident, as the issue discussed has a direct impact on economic social relations. The candidate's effort to present various scientific theses in their full scope and diversity is commendable. He has thoroughly reflected on numerous considerations. At times, he challenges and criticizes the formalism in the approach and the lack of clarity regarding the methods used for assessment (pp. 127, 180, 183). Often, he comprehensively summarizes – rightly so at the beginning of the dissertation – the main trends, theses, or individual viewpoints of both Bulgarian scholars and representatives of foreign scientific

doctrine on the subject matter. The dissertation contains not only observations but also a complex investigation by Kiril Ilchev into the issue of the impact of legislative acts, with the final chapter focusing particularly on the specific methods and techniques for conducting a comprehensive preliminary impact assessment.

The dissertation thoroughly and comprehensively discusses the theoretical aspects of impact assessment of normative acts (pp. 27–37), followed by an exceptionally concise analysis of the roles of legal and extralegal approaches in applying the tools of impact assessment of normative acts. Overall, the recommendations given for the improvement of legislation are appropriate and well-founded. Kiril Ilchev deserves congratulations for the well-argued defense of his detailed doctrinal thesis.

The overall content of the theoretical research is based on a serious, well-founded, and systematic analysis. Kiril Ilchev demonstrates a high level of expertise on the topic. He develops the research question with great diligence, thoroughly commenting and comprehensively listing the principles of the legislative process that are reflected in the drafting of normative acts. The theoretical work highlights competence, skill, and thorough awareness of every issue discussed, approached in a multifaceted and complete manner. The dissertation is, by its nature, a precise and excellently structured scientific work. All three chapters are balanced in length – the first (77 pages), the second (95 pages), and the third (72 pages). The quality of the work from a linguistic standpoint is excellent. The dissertation fully meets the requirement of being free of spelling errors. The writing style is concise, well-organized, clear, and precise.

The submitted work for review has been independently prepared. The results and contributions of the scientific work are original and have not been borrowed from research and publications in which Kiril Ilchev has no participation. In accordance with Article 27, paragraph 2 of the Rules for the Implementation of the Law on the Development of the Academic Staff in the Republic of Bulgaria, a declaration of originality of the dissertation “Economic Impact Assessment of the Normative Legal Acts” has been submitted. References to other authors have been made through proper citation in accordance with the Copyright and Related Rights Act and through a bibliography.

In conclusion to this part of my review, I will state that the dissertation complies with the requirements of Article 31, paragraph 1, item 2 of the Regulations for the Development of the Academic Staff at Plovdiv University “Paisii Hilendarski.”

I recommend that the study “Economic Impact Assessment of the Normative Legal Acts” be published, as it possesses high theoretical and scientific-applied merits.

The abstract contains, with the exception of one, the necessary requisites. It provides a general characterization of the dissertation. Its relevance is well-argued. The object, subject, and tasks of the research are specified, along with the methodology used, the scope and structure of the scientific work, and the bibliography. A brief summary of the content of the scientific work is presented. Publications related to the dissertation are described. The abstract is properly formatted and corresponds to the topic and content of the doctoral work. The only drawback I find is the absence of a description of the scientific contributions of the submitted work, which are included in the dissertation itself (p. 8).

#### **4. Scientific Contributions**

The dissertation provides a thorough analysis of a number of significant issues related to the impact assessment of normative acts and its economic manifestations. Among these, I recognize the following as having a particularly contributory character for legal science:

4.1. The contribution to theory lies in the doctoral candidate's comprehensive elucidation of the legal concept of "impact assessment of normative acts" by enriching it with the notion of "economic impact assessment".

4.2. The detailed analysis of the connections between the assessment of economic impact and the effectiveness of legal norms, as well as the quality of the legislative process in the field of economic relations, can be regarded as a contributory achievement.

4.3. The study of the legal dimensions of impact assessment in the context of functionality and effectiveness can be considered significant for legal doctrine.

4.4. The identification of the main problems facing impact assessment and the presentation of proposals for improving the legislative framework and impact assessment practice are met with some skepticism, particularly regarding the proposals to establish a special body overseeing the quality of impact assessments. Creating an additional administrative structure is unlikely to improve the current situation of poor-quality legislation issued by the National Assembly and administrative authorities. The main drawback is found in the Regulation on the scope and methodology for conducting impact assessments, which serves as a prime example of a complex, abstract, unclear, and difficult-to-apply legal act in the daily legislative activities of public administration bodies.

## **5. Publications and Participation in Scientific Forums**

Kiril Ilchev's publications on the topic, as well as his participation in scientific forums, are sufficient both in volume and thematic scope. They meet the requirements of the legislation. Their value to legal science and practice is significant, as the content of the theoretical research demonstrates the doctoral candidate's commitment to discussing, within the scientific community, the essential issue of the economic manifestations of the impact assessment of normative acts with the necessary diligence and thoroughness. The publications showcase Kiril Ilchev's considerable interest in the subject matter:

5.1. Law and Economics and the Economics of Rights – An Exposition in Qualitative and Adaptive Legislation. In: Spring Legal Days 2020: Proceedings of the Conference organized by the Faculty of Law of Plovdiv University "Paisii Hilendarski." Plovdiv: University Publishing House of Plovdiv University "Paisii Hilendarski," 2021, pp. 62–79. ISBN 978-619-202-723-0.

5.2. Predictability and Security – Criteria for Creating "Better" Regulations. In: Scientific Readings on the Topic "Predictability of Law": Proceedings of the Scientific Conference held in Sofia on May 12, 2021. Sofia: University Publishing House "St. Kliment Ohridski," 2022, pp. 185–198. ISBN 978-954-07-5478-9.

5.3. The Role of the "Impact Assessment of Normative Acts" in Our Legal System. In: Law in the 21st Century – Challenges and Perspectives: Proceedings of the International Scientific Conference held on the occasion of the 30th anniversary of the establishment of the Faculty of Law at Plovdiv University, Plovdiv, October 13–14, 2022. Vol. 2, Public Law Sciences, Criminal Law Sciences, International Law Sciences. Plovdiv: University Publishing House of Plovdiv University "Paisii Hilendarski," 2023, pp. 76–88. ISBN 978-619-202-904-3.

## **6. Conclusion**

The PhD dissertation “*Economic Impact Assessment of the Normative Legal Acts*” by Kiril Ilchev is presented in a format and volume that comply with the specific requirements of the Department of Theory and History of Law at the Faculty of Law, Plovdiv University “Paisii Hilendarski.” The work contains numerous theoretical generalizations and solutions to important doctrinal and applied scientific problems in the field of economic impact assessment aimed at improving the effectiveness and quality of the legislative process. It constitutes a significant and original contribution to legal science. Kiril Ilchev possesses deep theoretical knowledge and professional skills in the scientific specialty of Law, particularly in the area of general legal theory, demonstrating qualities and abilities for independently and thoroughly conducting an important scientific study.

For the reasons outlined above, I confidently give a positive evaluation of the conducted research, as presented in the reviewed dissertation, abstract, achieved results, and contributions. I unequivocally recommend to the esteemed academic jury to award the educational and scientific degree of PhD to Kiril Stoyanov Ilchev in the field of higher education: 3. Social, Economic and Legal Sciences, professional field: 3.6. Law (Theory of State and Law).

May 23, 2025

**Reviewer:**

Prof. Rayna Nikolova, D.Sc.  
Lecturer at New Bulgarian University  
(NBU)