

REVIEW

By prof. Boyka Ivaylova Cherneva,

Internal member of scientific Jury (order № ПД-22-810/02.04.2025 г.)

REGARDING: Public defense of a dissertation on the topic "Assessment of the Economic Impact of Regulatory Legal Acts" with author Kiril Ilchev for the acquisition of the ONS "Doctor" in the field of higher education "Social, Economic and Legal Sciences", professional direction 3.6 Law (Theory of State and Law)

Data about the candidate in the procedure

The dissertation candidate Kiril Ilchev has a bachelor's degree in Macroeconomics from the Paisii Hilendarski University. He also obtained a master's degree in Financial Management. He subsequently graduated from the Paisii Hilendarski University with a degree in Law. He has professional experience in the field of tax collection and management and mandatory social security contributions, as well as control over compliance with tax and social security legislation in the Republic of Bulgaria. He worked in the NRA's Tax Administration - Plovdiv. He carries out consulting activities in the field of accounting. His professional qualification in the field of economics favors the development of the topic of the dissertation.

Kiril Ilchev was discharged with the right to defend, he submitted for discussion in the Department of "Theory and History of Law" a dissertation on the topic: "Assessment of the Economic Impact of Regulatory Legal Acts" and after discussion on 17.03.2025, a procedure for public defense was opened before a scientific jury in accordance with the requirements of the Academic Staff Development Act and the Regulations of the Academic Staff Development Act of the Republic of Bulgaria, as well as the requirements of the internal regulations of the "Paisiy Hilendarski" University. The dissertation candidate has submitted all materials necessary for the public defense, including a declaration of originality.

Characteristics of the Dissertation

The dissertation consists of 274 pages. Structurally, it includes an introduction, three chapters, a conclusion, and a bibliography containing 189 cited sources in both Cyrillic and Latin

scripts. The topic of the dissertation is timely and significant. Quality legislation is increasingly the subject of legal research. The regulatory impact assessment (RIA) institute has been implemented in Bulgaria for nearly a decade and has undergone substantial development within EU law as well. The large volume of legislation, the specifics of legal regulation as a political and legal process, and issues of legal drafting require a unified methodology to enhance legislative effectiveness throughout the creation, issuance, and adoption of normative legal acts. A crucial element of regulatory impact assessment is the evaluation of economic impact. The dissertation focuses on examining precisely this economic impact of normative acts, combining both legal and economic perspectives. A major challenge for the author is discussing the normative nature of law in the context of economic criteria for ensuring effective legislation through better planning and analysis of the law-making process.

The relevance of the dissertation topic is also emphasized by the current discourse on legal predictability, an essential part of which is the appropriateness and effectiveness of systems aimed at achieving stable economic development and public security. The perspective taken towards law-making is rational, which defines the core questions under investigation—rationalizing expenditures, optimizing public administration, and promoting economic growth. The author adopts a multidisciplinary approach, integrating legal-sociological, normative legal, and economic methods to explain the multifaceted nature of the issue and offer solutions for legal theory and practice. The author refers to this approach as integrative.

The subject of the study is the institute of regulatory impact assessment of normative legal acts as a means of improving the quality and predictability of the legislative process through clarifying the economic impact assessment. The topic is aimed at elucidating the legal-economic aspects of preparing, issuing, and adopting normative acts. The dissertation contributes to clarifying the significance of economic factors in the creation of effective legislation. The subject largely determines the chosen approaches. The author widely applies a legal-sociological approach. The creation of normative legal acts is analyzed in terms of establishing the best possible legal regulation. The topic enriches the research on the essence of law-making.

Chapter One is devoted to defining the concept of regulatory impact assessment. The historical development of the institute is traced. Methodological and theoretical characteristics are examined. Conclusions are drawn regarding the establishment of impact assessment as an

important tool within the regulatory function of law. Attention is given to predictability and legal security as elements of quality regulation. The author provides an interesting perspective on the instrumental nature of law. This part primarily uses a legal-sociological approach, allowing impact assessment to be viewed as a tool for achieving legislative effectiveness. It is placed within the context of legal theory, examining the basic rules and principles of the law-making process. Regulatory impact assessment is also defined as a tool for balancing law and politics in the legislative process.

The author explores the methodological and theoretical aspects of the economic impact assessment of normative acts, clarifying its normative characteristics as a legal institute. The issue is skillfully examined through the lens of the legal system—one of the challenges facing law. The author positions law as a regulator, based on its social nature. Valuable reflections are offered on the factual reality as feedback to legal norms. Legal predictability and security are defined as criteria for the optimality and effectiveness of legal regulation. Despite the distinctly legal-sociological study of the issue, the research leads to conclusions in the field of legal theory. The ideological roots of the impact assessment institute and the relationship between rationality and normativity in legal regulation are discussed. This part further develops and enriches research in the fields of jurisprudence and legislative justification. It contains theoretical contributions to the theory of law-making.

Chapter Two addresses the issues of assessing the economic impact of normative legal acts in the EU and Bulgaria. Principles, criteria, and indicators of the law-making process and impact assessment are examined, along with procedural stages and analytical steps of the RIA process. The implementation of the impact assessment institute is studied, with a focus on its economic dimension. The legal framework of the impact assessment mechanism is presented and analyzed in detail. Both ex-ante and ex-post assessments are considered. The procedural stages and analytical steps of economic impact assessment are outlined and explained. The practical issues and challenges in implementing economic impact assessments of normative acts are identified and discussed.

A substantial portion of this chapter is dedicated to defining the concept of the economic impact of normative legal acts. The legal framework is presented, and types of economic impact assessments are categorized.

Chapter Three has an applied nature and presents the practical aspects of economic impact assessment. The author's approach of analyzing official statistical data to draw conclusions on the costs and benefits of achieving the best possible predictable legal regulation is valuable. Cost-effectiveness analysis is part of the research. Of particular importance is the presentation of the best practices for enhancing legislative effectiveness. The author conducts a comparative study of the best international practices, offering examples of positive outcomes in efforts to create quality legislation. The discussion of the topic in the context of digitalization, innovation, and impact assessment is also noteworthy.

The conclusion of the dissertation summarizes the main findings in line with the content of the work.

Abstract and Publications on the Dissertation Topic

The doctoral candidate has submitted a 33-page abstract that clearly, coherently, and accurately presents the content and contributions of the dissertation. He has published three articles on the topic of the dissertation.

Scientific Contributions

The work continues general theoretical research into the social nature of law and its function as a social regulator. It contributes to studies on the effectiveness of law and, more specifically, on the creation of effective legislation. The dissertation examines the significance of economic factors in the development of normativity, offering several new ideas for establishing independent economic justification for draft normative acts and the effectiveness of existing ones.

The discussion of both the legal and extra-legal dimensions of economic impact assessment within a unified theoretical study is a noteworthy contribution. The author's conclusions on the complex nature of the regulatory impact assessment institute, especially the economic impact aspect, are significant. The assessment is defined both as an institute and a tool. On one hand, the economic impact assessment is presented as part of the normative framework for the creation of legal acts; on the other, it is analyzed as a tool for improving the effectiveness and transparency of the legislative process. The use of economic analysis in law is important for the development of legal-economic interdisciplinary research. The analysis of economic

regulations in the context of principles of transparency, democracy, and the rule of law is another notable contribution.

The economic impact assessment is defined as an independent element of the "impact assessment" system, directly linked to the predictability and security of the legislative process. The substantiation of a "legislative economy," which studies the efficiency and economic justification of the legislative process, is proposed.

Clarifying the economic aspects of impact assessment is key to the integrated impact assessment process. Its economic influence is defined as a mechanism for incorporating and using economic methods and techniques in law.

The dissertation makes a theoretical contribution to understanding the legal-economic aspects of legal regulation. It enriches the theory of law-making. The author's reflections on the place of the impact assessment institute in the legal system are of a contributory nature.

Defining the concept and types of economic impact assessments is a significant contribution to the theory of law-making.

The comparative legal study of the impact assessment institute and the identification of best practices should also be noted as valuable contributions.

Conclusion

The presented characterization of the procedure and the dissertation, as well as the identified scientific contributions, provide grounds to conclude that Kiril Stoyanov Ilchev possesses the capacity for independent theoretical reasoning in the field of legal theory. The dissertation titled "Economic Impact Assessment of Normative Legal Acts" contains substantial theoretical and practical results.

Based on the above, I give a POSITIVE EVALUATION and recommend that the academic committee vote for Kirill Ilchev to acquire the educational and scientific degree of Doctor in the field of higher education 3. Social, Economic, and Legal Sciences, professional field 3.6. Law (Theory of State and Law. Political and Legal Doctrines).

2.06.2025 z.

***Signature:***