

2025 Rule of Law Report - targeted stakeholder consultation

Fields marked with * are mandatory.

Introduction

The annual Rule of Law Report lies at the centre of the Annual Rule of Law Cycle, which acts as a preventive tool, deepening multilateral dialogue and joint awareness of rule of law issues. So far, five editions of the Rule of Law Report have been published since 2020.

As every year, the Commission would like to invite the stakeholders to provide contributions to the 2025 Rule of Law Report. On the basis of these contributions and on-going developments, further targeted questions may be shared at a later stage of preparation of the 2025 Rule of Law Report, in particular in the context of country visits, or bilateral contacts.

The Commission invites stakeholders to provide contributions which include:

- (1) information on measures taken to implement the recommendations addressed to the Member State in the 2024 Rule of Law report, as well as developments with regard to the points raised in the respective country chapter and**
- (2) any other significant developments since January 2024^[1] and up to the date of submission falling under the ‘type of information’ outlined below.**

The input should consist of a short summary, if possible in English, covering the areas referred to below. Legislation or other documents may be referenced with a link. Contributions should focus on significant developments since the last Rule of Law Report both as regards the legal framework and its implementation in practice.

If you would like to provide further specific **input related to the single market dimension in the Rule of Law report**, you can also respond to the additional targeted consultation available [here](#).

^[1] Unless the information was already submitted in the input for the previous Rule of Law Reports.

Type of information to be included:

Under each of the four pillars, the replies should include references to the following types of information:

A) Legislative developments

- Newly adopted legislation
- legislative drafts currently discussed in Parliament
- legislative plans envisaged by the Government

B) Policy developments

- Implementation of legislation
- evaluations, impact assessment, surveys
- white papers/strategies/actions plans/consultation processes
- follow-up to reports/recommendations of Council of Europe bodies or other international organisations
- important administrative measures
- generalised practices

C) Developments related to the judiciary / independent authorities

- important case law by national courts
- important decision/opinions from independent bodies/authorities
- state of play on terms, nominations and expired mandates for high-level positions (e.g. Supreme Court, Constitutional Court, Council for the Judiciary, Prosecutor General, heads of independent authorities included in the scope of the request for input[2])

D) Any other relevant developments

- National authorities are free to add any further information, which they deem relevant; however, this should be short and to the point.

Please also indicate whether the developments reported are linked to the implementation of reforms and investments under the RRP, where applicable. To simplify your answers to the questionnaire, **if there are no developments, it is sufficient to indicate this** and the information covered in the contributions for the previous Rule of Law Reports does not need not be repeated.

[2] Such as: media regulatory authorities and bodies, national human rights institutions, equality bodies, ombudsman institutions, supreme audit institutions and, where they exist, transparency authorities.

About you

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☒ Civil society organisation/NGO
- ☐ International organisation
- ☐ Judicial association or network
- ☐ Media organisation or association
- ☐ Public authority or network of public authorities

☐ Other

* Organisation name

250 character(s) maximum

Center for the Study of Democracy

Main Areas of Work

- ☒ Justice System
- ☒ Anti-corruption
- ☒ Media Pluralism
- ☒ Checks and Balances
- ☒ Other

If "Other", please specify

Geoeconomics, Disinformation, Security, Energy, Human rights protection

Please insert an URL towards your organisation's main online presence or describe your organisation briefly:

500 character(s) maximum

<https://csd.eu/>

Transparency register number

Check if your organisation is in the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making

15789364550-66

* Country of origin

Please indicate the country of origin of your organisation

- ☐ Austria
- ☐ Belgium
- ☒ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy

- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Other - please specify

First name

Iliana

Surname

Boycheva

Email Address of the organisation

office@csd.eu

*** Publication of your contribution and privacy settings**

You can choose whether you wish for your contribution to be published and whether you wish your details to be made public or to remain anonymous.

- ☐ Anonymous - Only your type of respondent, country of origin and contribution will be published. Organisation name, URL, transparency register number, first name and surname given above will not be published. **To maintain anonymity, please refrain from mentioning the name of your organisation and any details from which your organisation can be identified in the rest of your contribution.**
- ☒ Public - Your personal details (name, organisation name, transparency register number, country of origin) will be published with your contribution).
- ☐ No publication - Your contribution will not be published. Elements of your contribution may be referred to anonymously in documents produced by the Commission based on this consultation.

☒ I agree with the personal data protection provisions.

[Specific privacy statement targeted stakeholder consultation 2025 rule of law report.pdf](#)

Questions on horizontal developments

In this section, you are invited to provide information on general horizontal developments or trends, both positive and negative, covering all or several Member States. In particular, you could mention issues that are common to several Member States, as well as best practices identified in one Member State that could

be replicated. Moreover, you could refer to your activities in the area of the four pillars and sub-topics (an overview of all sub-topics can be found below), and, if you represent a Network of national organisations, to the support you might have provided to one of your national members.

Overview topics for contribution

[List of topics - 2025 Rule of Law Report.pdf](#)

Please provide any relevant information on horizontal developments here

5000 character(s) maximum

State capture, systemic corruption, and politicization within key civil security institutions (law enforcement, judiciary, and intelligence services) undermine the rule of law in Bulgaria and other Balkan countries (see: <https://csd.eu/publications/publication/safeguarding-the-foundations/>). Civil security institutions remain heavily influenced by political and economic elites. This interference results in weakened anti-corruption mechanisms and compromises institutional independence. For Bulgaria, the integration of the Prosecutor's Office into the judiciary, along with its highly centralized structure, has facilitated political control, hindering its ability to prosecute high-profile corruption and security-related cases effectively. These governance gaps allow external actors, notably the Kremlin, to exploit institutional frailties, perpetuate hybrid threats, and influence decision-making processes. This underscores the urgent need for institutional reform and the strengthening of judicial independence in Bulgaria and the EU.

These findings are also relevant for EU candidate countries like Montenegro, North Macedonia, and Serbia, which have also seen the destabilizing effects of foreign interference, particularly through Russian-backed illicit financial flows (IFFs) and the manipulation of critical civil security institutions. The politicization of civil security sectors, combined with weak anti-corruption frameworks, undermines their democratic transitions and hinders progress toward EU accession. Strategic ambiguity, as seen in Serbia's alignment with Russia, further complicates the EU's efforts to promote rule of law and reform. Therefore, candidate countries need to work tirelessly to dismantle state capture networks, enhance anti-corruption mechanisms, and address the geopolitical influence of external authoritarian actors, all of which are critical for aligning these nations with EU values and standards.

The EU institutions and law enforcement agencies remain generally underprepared and lack capacity to implement effectively the different instruments of EU's newly introduced Economic Security Strategy, which aims to also guarantee the democratic resilience and tech sovereignty of the community and its member states. A key focus in this direction should be on strengthening and harmonizing investment screening regulations across Member States, and in particular its judicial enforcement. The lack of uniformity in these mechanisms creates vulnerabilities in protecting critical sectors and infrastructure from strategic corruption and foreign interference. The Rule of Law Report should emphasize the need for all Member States to establish and effectively enforce robust foreign direct investment (FDI) screening frameworks, covering strategic sectors such as critical raw materials, technology, and defense. Moreover, the EU should consider a centralized mechanism to oversee compliance, ensure transparency, and address cross-border implications of FDI decisions. This would not only fortify economic resilience but also bolster the broader security framework of the EU. (see: <https://csd.eu/publications/publication/forging-the-shield/>)

One pertinent issue at the intersection of rule of law and economic security is the enforcement gap in sanctions against Russia, particularly through the misuse of existing loopholes that allow circumvention through third countries. (see: <https://csd.eu/publications/publication/navigating-sanctions/>). The case of Bulgaria's derogation for Russian crude oil imports, exploited by Lukoil to generate significant revenues for the Kremlin, highlights systemic weaknesses in enforcement. (see: <https://csd.eu/publications/publication/sanctions-evasion-and-derogation-on-russian-oil/>). Recommendations include lifting derogations for landlocked Central European countries and Bulgaria, enhancing customs regulations and inter-EU cooperation to ensure transparency, and imposing stricter penalties for violations, such as aligning fines with anti-trust standards at 10% of annual revenues. Strengthening the capacity of institutions like the European Public Prosecutor's Office (EPPO) and enhancing collaboration with OLAF would improve monitoring, enforcement, and prosecution of violations. (see: <https://csd.eu/publications/publication/sanctions-hypocrisy/>)

Under each pillar, you are invited to provide information on measures taken to implement the recommendations addressed to the Member State in the 2024 Rule of Law report, as well as developments with regard to the points raised in the respective country chapter of the 2024 Rule of Law Report and any other significant developments since January 2024 and up to the date of submission[3]. Please always include a link to and reference relevant legislation/documents (in the national language and/or where available, in English). **Significant developments** can include challenges, positive developments and best practices, covering both legislative developments or implementation and practices.

Information provided in reply to the first question under each pillar, related to the follow-up to the recommendations, does not need to be repeated in subsequent parts of the questionnaire, but can be cross-referenced in the subsequent questions, where relevant. All other questions are not limited to the recommendations, but as in previous years, cover the entire scope of the Report.

[3] Unless already covered in the input for the previous Rule of Law Reports.

Member State/enlargement country covered in contribution [only one choice possible]

If you wish to submit information concerning several Member States/enlargement countries, please fill in the questionnaire separately for each country. There is no limit to the number of contributions submitted by a single participant.

- ☐ Albania
- ☐ Austria
- ☐ Belgium
- ☒ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Montenegro
- ☐ Netherlands
- ☐ North Macedonia
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Serbia

- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden

I. Justice System

Please provide information on measures taken to follow-up on the recommendations received in the 2024 Report regarding the justice system (if applicable)

5000 character(s) maximum

Last year, Bulgaria's political crisis deepened, further destabilising the justice system. Shortly after the publication of the EU Commission's 2024 Rule of Law Report, the Constitutional Court ruled that most provisions related to judicial reform were unconstitutional. As a result, the judiciary reverted to the status quo prior to the constitutional amendments. Consequently, some of the progress highlighted in the previous year's Rule of Law Report has been reversed.

Additionally, Bulgaria has failed to make progress on other key recommendations made by the EC in its 2024 Rule of Law Report concerning strengthening the independence of the judiciary, ensuring transparent and merit-based appointments and enhancing the operational capacity of anti-corruption bodies.

A. Independence

Appointment and selection of judges, prosecutors and court presidents (incl. judicial review)

(The reference to 'judges' concerns judges at all level and types of courts as well as judges at constitutional courts)

5000 character(s) maximum

In January, Bulgaria's Parliament elected two constitutional judges, filling vacancies that had persisted for over two years due to political deadlock. Notably, one appointee was a prominent political figure and leader of a parliamentary group, which raised concerns about independence and potential conflicts of interest in particular in relation to her involvement in the constitutional amendments adopted in 2023 while she was still in Parliament. She chose not to withdraw from the constitutional case concerning the amendments she had previously supported in Parliament. This decision drew criticism from representatives of civil society and academia, who argued that, while there was no explicit rule requiring her withdrawal, her involvement was in conflict of interest and jeopardized the principle that no one can judge in a case where they have interest. They also referenced similar past instances, such as Constitutional Case No. 17/2021, where constitutional judges had withdrawn themselves under comparable circumstances. These appointments occurred a day before a Constitutional Court ruling clarified that judges elected after a term's expiration should serve only the remainder of the seven-year term, not the full nine years. Despite this, the Parliament assigned them a nine-year term. Following a legal challenge, the Court reduced these terms to seven years in July.

In November 2024, the term of the President of the Supreme Administrative Court (SAC), expired. Despite concerns about his independence from political pressure, due to alleged conflicts of interest, the Supreme Judicial Council (SJC)—which mandate had already expired—reappointed him in an acting capacity, due to a lack of other nominees. The re-appointment contradicted a Constitutional Court decision prohibiting any action that effectively extends the term of judiciary presidents beyond the constitutional seven-year limit. Although the Constitution explicitly forbids extensions for the presidents of the two supreme courts and the Prosecutor General, the SJC circumvented this by appointing Georgi Cholakov as Acting President of SAC. Critics argue that this undermines constitutional principles and judicial independence, with CSOs questioning the suitability of the appointment due to controversial decisions and a lack of transparency in SAC operations, including concealing judge attendance data during key elections.

Another controversial decision of the SJC was to initiate a procedure for the election of a new Prosecutor General. This decision and the procedure that followed raised several major concerns. On the one hand, the SJC's mandate expired more than two years ago, which puts into question its moral legitimacy (and according to some observers – its legal legitimacy as well) to elect people to key positions in the judiciary, such as the Prosecutor General. On the other hand, in the course of the procedure that followed, only one candidate was nominated – Borislav Sarafov, deputy of the dismissed former Prosecutor General Ivan Geshev and later appointed as Acting Prosecutor General in his place. This sole nomination faced significant political and public opposition due to the candidate's alleged involvement in unlawful activities, including politically motivated criminal investigations. Additionally, not only did Sarafov's concept for managing the prosecution, published after his nomination, not include any concrete measures against corruption, but some of the other items on his agenda raised serious concerns from a rules of law perspective. For example, Sarafov proposed eliminating the requirement for prosecutors to justify refusals to initiate pre-trial proceedings, potentially reversing rule-of-law advancements highlighted in previous European Commission reports. In his concept, he also advocated for removing time limits on investigations, raising concerns about a potential revival of the problematic "eternally accused" phenomenon, characterised by endless criminal proceedings with no resolution.

Various stakeholders, including professional organizations, have called for Sarafov to withdraw his candidacy, arguing that the election procedure is illegitimate, uncompetitive, and undermines public trust. In early 2025, MPs from three different parliamentary groups proposed amendments to the Law on the Judiciary to prevent the SJC from finalising the election procedure. These amendments were eventually passed in a matter of days, prohibiting a SJC with an expired mandate to elect the the Prosecutor General and the presidents of the two supreme courts, and ending the open procedure for election of a new Prosecutor General.

Although they achieved their ultimate goal of stopping the procedure for the election of a new Prosecutor General, the adopted amendments left the suspicion of legislating for a specific person (*ad personam* legislation), which provides only a temporary solution to an otherwise systemic problem.

Irremovability of judges, including transfers, (incl. as part of judicial map reform), dismissal and retirement regime of judges, court presidents and prosecutors (incl. judicial review)

5000 character(s) maximum

Promotion of judges and prosecutors (incl. judicial review)

5000 character(s) maximum

Allocation of cases in courts

5000 character(s) maximum

Independence (including composition and nomination and dismissal of its members), and powers of the body tasked with safeguarding the independence of the judiciary (e.g. Council for the Judiciary)

5000 character(s) maximum

In 2024, another opportunity to appoint a new Supreme Judicial Council (SJC) and a new Inspectorate within the SJC was missed, with the current SJC's mandate having expired two years earlier. As a result, for example, the Inspectorate's head, Teodora Tochkova, originally appointed in 2015 for a single five-year term, has now served two full terms. These appointments have been repeatedly postponed by Parliament due to ongoing political instability and a succession of short-lived legislatures.

Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (incl. judicial review)

5000 character(s) maximum

The constitutional reform secured a mechanism for ensuring the effective accountability and criminal liability of the Prosecutor General and their deputies. Since late 2023 and throughout 2024, several reports have been filed against the Acting Prosecutor General. However, as of October 2024, no sufficient evidence of a crime has not been found in connection with any of them. Moreover, this information was not made public by the Prosecutor's Office but was disclosed only when the Acting Prosecutor General was nominated in the procedure for the election of a new Prosecutor General.

Further doubts about the effectiveness of the mechanism for investigating the Prosecutor General have been raised by the attempts of the online news outlet Mediapool to obtain access, under the Access to Public Information Act, to the rulings of the ad hoc prosecutor concerning investigations against the Acting Prosecutor General. The Prosecutor's Office ultimately refuse to provide access to the requested rulings, but the fact that the refusal did not come from the ad hoc prosecutor but from the deputy of the investigated Acting Prosecutor General reinforced concerns about the mechanism's independence, impartiality and transparency. Overall, the notable lack of transparency and openness in the procedures for investigating the Acting Prosecutor General echoed the observations made in last year's Rule of Law Report regarding procedural and practical shortcomings in the relevant regulations.

The deepening of the problems with the transparency and accountability of the prosecutor's office is evidenced by the request of the Acting Prosecutor General to the Supreme Administrative Court (SAC) to restrict, with an interpretative decision, the access to information concerning prosecution investigations and inspections. According to this request, prosecutors' decisions to terminate pre-trial proceedings, as well as those related to internal inspections, should not be considered "public information." The case is still pending at the SAC, but any decision granting the request of the Acting Prosecutor General would further limit transparency, not only in cases involving the Prosecutor General but in all proceedings of the prosecution, which is a significant risks to the rule of law.

Independence/autonomy of the prosecution service

5000 character(s) maximum

Independence of the Bar (chamber/association of lawyers) and of lawyers

5000 character(s) maximum

Significant developments capable of affecting the perception that the general public has of the independence of the judiciary

5000 character(s) maximum

B. Quality of justice

(Under this topic, you are not required to give statistical information but should provide input on the type of information outlined in the introduction)

Accessibility of courts (e.g. court/legal fees, legal aid, language)

5000 character(s) maximum

Resources of the judiciary (human/financial/material), remuneration/bonuses/rewards for judges and prosecutors, including observed changes (significant and targeted increase or decrease over the past year)

(Material resources refer e.g. to court buildings and other facilities. Financial resources include salaries of staff in courts and prosecution offices.)

5000 character(s) maximum

Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

5000 character(s) maximum

While national-level training opportunities exist for the different legal professionals, it is crucial to emphasize the need for interdisciplinary training involving lawyers, judges, and prosecutors altogether. Such programs would facilitate the exchange of best practices. Additionally, there is a pressing demand for more cross-border training on topics related to the rule of law and European Union law, particularly the EU Charter of Fundamental Rights and other mechanisms that safeguard the rule of law through EU instruments.

Over the past decade, Bulgaria has faced increasing scrutiny due to allegations of judicial corruption, selective application of justice, and inadequate safeguards for judicial independence – issues that have undermined public trust and compliance with EU standards. In response to these challenges, prominent legal experts, training institutions and CSOs have worked to address persistent rule of law shortcomings across the EU. Civil society organisations from Bulgaria, Romania, Hungary, Poland and Greece have supported more than 300 lawyers in these countries - by providing specialised transnational training on EU rule of law acquis. The training's content was based on a preliminary Training needs assessment report focused on the lawyers perspectives on the current RoL challenges in Bulgaria, Romania, Greece, Hungary and Poland.

(see: https://csd.eu/fileadmin/user_upload/projects/files/Individual_TNA_Country_Reports.pdf)

After the finalisation of the trainings, key recommendations to EU decision-makers were made. Some of them included the need for the EU to adopt a more consistent and pro-active approach to rule of law issues in all Member States and to step up its efforts to combat safeguard the independence of the judiciary, to ensure equality before the law, to trigger more EU law instruments in order to safeguard fundamental rights enshrined in the Charter.

A digital e-course has been developed to provide lawyers with permanent access to EU legal resources and to encourage their participation in strategic litigation (see: <https://cecl.edu.gr/course/index.php?categoryid=4>).

In 2024, the Center for the Study of Democracy (CSD) developed a comprehensive online training programme for prison and juvenile probation professionals, working closely with the General Directorate for the Execution of Sentences at the Ministry of Justice to ensure that the training reached the target group: prison and probation officers working with sentenced children. In cooperation with organisations from Greece and Cyprus, CSD contributed to the development of an innovative training platform. The tool provides training modules for serving and trainee judges and prosecutors, as well as for court trainers specialising in child-friendly justice. A Comparative report Reforming Youth Corrections (<https://csd.eu/publications/publication/reforming-youth-corrections/>) analyzes youth justice systems in 10 EU member states, identifying deficiencies in the training of prison and probation staff working with convicted children. It offers insights into the needs of these professionals and recommends strategies to enhance their skills, emphasizing specialized care and reducing reoffending. The findings aim to guide policymakers and support the development of innovative training programs. (see: <https://arisa-project.eu/>)

Digitalisation (e.g. use of digital technology, including electronic communication and AI tools, within the justice system and with court users, procedural rules, access to judgments online)

5000 character(s) maximum

Use of assessment tools and standards (e.g. ICT systems, including AI-based systems, for case management, court statistics and their transparency, monitoring, evaluation, surveys among court users or legal professionals)

5000 character(s) maximum

Geographical distribution and number of courts/jurisdictions (“judicial map”) and their specialisation, in particular specific courts or chambers within courts to deal with fraud and corruption cases.

5000 character(s) maximum

C. Efficiency of the justice system

(Under this topic, you are not required to give statistical information but should provide input on the type of information outlined under section 2)

Developments related to efforts to improve the efficiency of the justice system (e.g. as regards length of proceedings)

5000 character(s) maximum

Any other developments related to the justice system - please specify

5000 character(s) maximum

II. Anti-Corruption Framework

Where previous specific reports, published in the framework of the review under the UN Convention against Corruption, of GRECO, and of the OECD address the issues below, please make a reference to the points you wish to bring to the Commission’s attention in these documents, indicating any relevant updates, changes or measures introduced that have occurred since these documents were published.

Please provide information on measures taken to follow-up on the recommendations received in the 2024 Report regarding the anti-corruption framework (if applicable):

5000 character(s) maximum

A. The institutional framework capacity to fight against corruption (prevention and investigation / prosecution)

List any **changes** as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical resources as relevant), including the cooperation among domestic and with foreign authorities. Indicate any relevant measures taken to effectively and timely cooperate with OLAF and EPPO

5000 character(s) maximum

One of the most significant recent developments was the establishment of the Anti-Corruption Commission (ACC), which replaced the former Anti-Corruption and Illegal Assets Forfeiture Commission (CACIAF). Despite its intended purpose, the ACC has faced persistent challenges in demonstrating both its independence and effectiveness. Since its inception in late 2023, following a legislative split from the Commission for Illicit Asset Forfeiture (CIAF), the ACC has remained embroiled in controversy, primarily due to the Bulgarian Parliament's failure to appoint new leadership. As a result of this leadership vacuum, Anton Slavchev, the deputy chair of the previous joint body prior to the 2023 reforms, continues to serve as the acting chair of the newly formed ACC. The agency's structural design has come under criticism. It lacks realistic strategies for attracting and retaining skilled investigators and operational staff, fails to employ specialised investigative tools such as informants and undercover officers, and has not established effective partnerships with other relevant agencies. Additionally, insufficient budgetary support has hindered the development of essential new capacities. High-profile cases, including investigations and parliamentary inquiries involving the head of the Customs Agency, the Secretary General of the Police, the former Minister of Finance, and the former Minister of Interior, have further fuelled concerns about the ACC's impartiality, with critics alleging that it operates under political influence.

Safeguards for the functional independence of the authorities tasked with the prevention and detection of corruption

5000 character(s) maximum

President of the Supreme Administrative Court (SAC) reflects broader systemic challenges in Bulgaria's judicial governance, similar to the issues surrounding the appointment of the Prosecutor General. The decision faced strong criticism, including from the Union of Judges in Bulgaria, over alleged constitutional and procedural violations and the lack of clear legal mechanisms for succession. Proponents argued that the Judicial System Act contains gaps, requiring analogous application of related provisions. The controversy highlights the SJC's lack of transparency and accountability, particularly as it operates beyond its mandate. Combined with the political instability preventing stable majorities capable of making necessary appointments, these practices have further eroded public trust in the judiciary, sparking protests and calls for reform.

In a separate controversy, the Anti-Corruption Commission (ACC) ruled in June 2024 that former "We Continue the Change" MP Andrey Gyurov was ineligible to serve as Deputy Governor of the Bulgarian National Bank (BNB) due to allegedly undisclosed ties to a dissolved company and NGO after assuming the role. On 12 December 2024, Administrative Court Sofia City annulled the ACC decision. According to the court, the decision on Gyurov's incompatibility was taken by a body that was not constituted under the terms and conditions of the Anti-Corruption Act. Observers believe that the ACC's action against Gyurov was politically motivated. Following constitutional amendments at the end of the previous year, the Governor and Deputy Governors of the central bank are now potential candidates for caretaker prime minister if a regular government cannot be formed. Gyurov's potential appointment as a care-taker PM was thus effectively sabotaged.

(see: <https://www.segabg.com/hot/category-bulgaria/sudut-otmeni-akta-na-kpkonpi-koyto-gyurov-beshe-mahnat-bnb>)

Meanwhile, the BNB Governor Dimitar Radev expressed concerns that appointing any BNB governors or deputy governors as caretaker prime ministers could compromise the institution's political independence. (see: <https://www.bta.bg/en/news/bulgaria/643488-president-meets-three-potential-caretaker-pms-central-bank-governor-says-it-is->)

Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators

5000 character(s) maximum

The latest Corruption Monitoring System's victimisation survey, conducted by the Center for the Study of Democracy (CSD), reveals that administrative corruption in Bulgaria has reached its highest level for the third time in two decades. In 2023, 30% of individuals and a quarter of businesses reported increased pressure and involvement in corruption. Moreover, corruption has evolved into both a strategic threat (used by authoritarian regimes to undermine democracies), and a systematic policy gap (state capture subverting government policy and decision-making in favor of private interests).

This alarming trend is further exacerbated by the lack of significant progress in high-profile state capture cases, compounded by emerging evidence of criminal and political influence peddling within the judiciary. Additionally, regulatory bodies and specialised anti-corruption institutions remain ineffective and incapacitated.

Despite substantial investments in anti-corruption efforts over the past decade—primarily funded by the European Union, including through the Recovery and Resilience Facility—the results have been disappointingly modest. These investments targeted the enhancement of Bulgaria's judiciary, law enforcement, and regulatory institutions, but they have not yielded the necessary reforms.

CSD recommends that Bulgaria prioritise two key policies to safeguard its democracy and address these challenges: 1) exposing and dismantling the mechanisms behind Russia-related state capture, and 2) strengthening anti-money laundering enforcement, with a particular focus on illicit financial flows in the energy sector. Furthermore, given the ineffectiveness and selectivity of national law enforcement, the mandate of the European Public Prosecutor's Office should be expanded to cover violations of EU sanctions against Russia. Additionally, the anti-corruption framework—encompassing regulatory bodies, enforcement agencies, and inspectorates—needs to be reinvigorated.

The National Anti-Corruption Strategy lacks measurable targets and fails to address the issue of state capture. Despite mentioning a vague intention to establish a monitoring mechanism, the strategy offers few specifics. Moreover, the anti-corruption legislation, which has called for an updated methodology to assess corruption risks in public administration since 2019, remains largely unimplemented. Thus, CSD recommends that any strategies include clear impact indicators, while corruption risk assessments go beyond potential monetary losses and the frequency of corruption occurring. Instead, they should focus also on the damage done to public institutions' abilities to perform and uphold the public interest. (Center for the Study of Democracy, The State of Capture. The Elusive Quest for Anti-Corruption Results, Policy Brief No. 144, Apr 2024, see: <https://csd.eu/publications/publication/the-state-of-capture/>). (Center for the Study of Democracy, , Confronting Strategic Corruption and Illicit Finance: Democratic Resilience and Economic Security, 20 June 2025, see: <https://csd.eu/events/event/confronting-strategic-corruption-and-illicit-finance-democratic-resilience-and-economic-security/>)

In 2024, the National Council for Anti-Corruption Policies (NCACP) is still Bulgaria's primary strategic body

for coordinating anti-corruption efforts. However, NCACP held no meetings in 2024. The Council's activities appear limited. No information about its work or annual reports has been made publicly available. The mid-term review of the National Strategy for Preventing and Combating Corruption is currently being prepared. (see: <https://www.gov.bg/bg/zerocorruption/natsionalen-savet-po-antikoruptionni-politiki>)

B. Prevention

Measures to enhance integrity in the public sector (including as regards incompatibility rules, revolving doors, codes of conduct, ethics)

5000 character(s) maximum

Measures to enhance general transparency of public decision-making (including rules on lobbying, asset and interest disclosure rules, gifts policy, transparency of political party, financing)

5000 character(s) maximum

A number of civil society organisations – the Bulgarian Institute for Legal Initiatives (BILI, <https://bili-bg.org>), the Center for the Study of Democracy (CSD, www.csd.eu) and the Access to Information Programme (AIP, <https://www.aip-bg.org/>), as members of the working group at the Ministry of Justice - initially for the preparation of a concept, and currently - a draft law, continued to actively participate in the development of the Bulgarian government's concept for regulating lobbying, promoting legislative decisions to increase transparency and integrity in public decision-making.

In their latest joint statement on the concept published for public consultation and in connection with a discussion with representatives of the EC held on 31 January 2024, they take the position in favour of a combination of two regulatory approaches - statutory provisions and voluntary self-regulation schemes, arguing that within the EU, there is no uniform, mandatory regulation of lobbying, i.e., Member States are free to decide which approach or approaches to choose. They specify that in its annual reports on the rule of law, the EC makes recommendations to many Member States to introduce lobbying rules, transparency standards and lobbyist registers, but without insisting that this be done through a special law. They agree with the principal note on the necessity for a broad definition based on the standards of the OECD and the Council of Europe, but taking into account the national context and specifying the activities, incl. criminal ones, that are not lobbying. The statement accepts the recommendation for the registration of the following: the identity of the lobbyists, the purpose of the lobbying activity individuals in relation to whom lobbying activity has been or is being conducted (incl. cases of established contacts, but not to register, every sent email, they can be described chronologically, e.g., "regular contacts, including 3 meetings in 4 months... year ... regarding law/bill x"). They express a strong opinion regarding non-profit legal entities registered for public benefit, which are mainly engaged in advocacy and given the existing legal framework and political context in Bulgaria, the requirement to indicate equivalent circumstances in their annual activity reports for declaring lobbyists is a sufficient guarantee for the transparency and publicity of their activities. There is no need to impose an additional administrative burden and register them in separate registers, which would also make it difficult to monitor their work due to the fragmentation of the sources in which information is published.

(CSD, Regulation of Lobbying Activities in the Republic of Bulgaria: Draft Concept, 2024, see: <https://csd.eu/blog/blogpost/2024/02/13/regulation-of-lobbying-activities-in-the-republic-of-bulgaria-draft-concept-1/>)

The most recent reports from the ACC and CIAF omit significant details, present information selectively and provide insufficient updates on ongoing cases. The lack of detailed analysis makes it hard to fully assess the Commissions' efforts and their influence on combating corruption. (Commission for Illegal Assets Forfeiture (CIAF) annual report 2023, see: https://www.caciaf.bg/web/files/documents/5/files/Doklad_KONPI_2023.pdf, annual report 2023, <https://www.caciaf.bg/bg/za-nas/prozrachnost/godishni-dokladi>)

Measures to prevent conflicts of interest in the public sector. Please specify the features and scope of their application (e.g. categories of officials concerned, types of checks and corrective measures depending on the category of officials concerned)

5000 character(s) maximum

--> For the three previous points, **please also provide information and figures on their application /enforcement/**, such as number of detected breaches/irregularities of the various rules in place and the follow-up given (investigations, sanctions, etc.)

Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given)

5000 character(s) maximum

The Bulgarian law transposing the EU whistleblower protection directive, which has been in force since 2023, has been amended several times in the same year and now has another draft submitted to the National Assembly for amendment and supplementation. The relevant rules and regulations have been adopted in due course, and the entities obliged to set up internal whistleblowing channels have adopted rules for doing so.

The Commission for Personal Data Protection (CPDP) - the designated central authority for external reporting (see: <https://cpdp.bg/en/explanatory-materials-on-the-whistleblowers-protection-act/>), publishes at its web-site explanations on principle issues on the application of the Whistleblower Protection Act, which are continuously updated and supplemented, taking into account both the incoming questions from citizens and obliged subjects, as well as the development of the practice on the application of the law. Detailed answers to frequently asked questions on the legal framework are also available there - <https://cpdp.bg/en/frequently-asked-questions-on-the-wpa/>.

There is also fairly detailed explanations on the submission and handling of whistleblowing and on the remedies are available on the websites of the obliged entities that have set up internal whistleblowing channels.

However, given the short period since the legislation came into force and the lack of uniform statistics (on internal and external reports, their status, support and protection measures provided), there are no convincing data on whistleblowing cases that are representative of Bulgarian national context.

According to the reported statistical data for 2023 by the CPDP, provided to the EC (see: <https://cpdp.bg/информация>), the total number of reports for violations falling under the Whistleblowing Act is 16, and all the reports received have been followed up by the competent authorities. In 2023 one inspection was discontinued as the report was forwarded for investigation by the District Prosecution's Office and is being monitored by the European Public Prosecutor's Office; one inspection was closed resulting in a judicial process and one inspection resulted in sanctions.

The number of closed investigations per area of violation is as follows: one for violation affecting the EU's financial interests within the meaning of Article 325 TFEU and further specified in the relevant Union measures, and two for infringements not falling within the material scope of Directive (EU) 2019/1937.

In 2024, CSOs played a key role in helping the Bulgarian government in promoting the protection of whistleblowers and fostering a culture of safe and effective whistleblowing. This support included providing detailed comments, recommendations and suggestions to improve the implementation of the legislation and ensure compliance with EU standards. CSD and Media Development Center from Bulgaria remained active members of the South East Europe Coalition on Whistleblower Protection (see:<https://see-whistleblowing.org>), contributing to policy development efforts ahead of the Coalition's upcoming 10th anniversary.

Specific measures to enhance transparency, integrity and accountability in sectors with high risks of corruption, with a view to monitor and prevent corruption and conflict of interests, and where applicable measures to prevent and address corruption committed by organised crime groups.

Such high-risk sectors could include: public procurement, including construction, transport/infrastructure, defence, cohesion, agriculture, environment, healthcare, citizen/residence investor schemes, large-scale investments of national interest and the spending of EU funds, urban planning.

5000 character(s) maximum

C. Repression

The legal framework on the criminalisation and sanctions for corruption and related offences, including foreign bribery

5000 character(s) maximum

Although the 2021-2027 Anti-Corruption Strategy includes plans to criminalise foreign bribery, in response to the OECD's 2023 recommendations, no concrete actions have been taken to implement this measure in 2024. This delay in action highlights a gap between the strategic goals set by the government and the lack of progress in addressing this important issue. Despite the clear international pressure to tackle foreign bribery, Bulgaria has yet to take the necessary legislative or institutional steps to bring the strategy to fruition.

Official data on the number of investigations, prosecutions, final judgments and the application of sanctions for corruption offences (differentiated by offence if possible). Please indicate whether the cases: involve legal persons; are related to the implementation of EU or national funds; involve high level corruption. Please indicate which data is publicly available and how policy-making is informed by the data

5000 character(s) maximum

The available quantitative data on anticorruption cases does not provide clear, data-driven insights into the effectiveness of the prosecution, police, or courts in preventing or deterring corruption, nor into the long-term impact of punitive measures. However, recent figures from the Center for the Study of Democracy (CSD) suggest very low efficiency. CSD's Corruption Monitoring System (CMS) reveals a significant gap in the enforcement of anti-corruption laws, especially when comparing Prosecutor's Office statistics on the number of pre-trial proceedings and persons convicted with CMS survey data of corrupt transactions. This gap indicates a deterrence effect of less than 0.01%, far lower than for other serious crimes.

Potential obstacles identified in law or in practice to the investigation and prosecution of high-level and complex corruption cases (e.g. political immunity regulation, procedural rules, statute of limitations, cross-border cooperation, pardoning)

5000 character(s) maximum

Information on effectiveness of criminal and non-criminal measures and of sanctions (e.g. recovery measures and administrative sanctions) on both public and private offenders

5000 character(s) maximum

In 2024, the Anti-Corruption Commission (ACC) reported that investigative measures related to high-level corruption were carried out in connection with five cases, resulting in the indictment of 26 individuals. While more recent data are not available, as of 1 March 2024, the Prosecutor's Office reported a total of 169 criminal proceedings concerning corruption-related allegations against high-ranking officials. The majority of these cases were handled by the Sofia Court of Appeal (98 cases), followed by the Court of Appeal in Plovdiv (37 cases), Varna (16), Veliko Tarnovo (12), and Burgas (6). (Dachkova, D., The Day When the Fight Against High-Level Corruption Ceased, 13 March 2024, <https://www.segabg.com/category-observer/denyat-koyto-borbata-visokata-korupciya-sprya>) (Vodenicharova, Y., Real Change Is Needed to Tackle High-Level Corruption – Report, Bulgarian News Agency, 17 January 2024, see: <https://www.bta.bg/en/news/bulgaria/602257-report-on-rule-of-law-in-bulgaria-points-to-need-for-real-change-in-response-to->)

An indication of the ineffective criminal prosecution of high-level corruption in Bulgaria is the frequent termination of investigations during pre-trial proceedings, with these decisions often going unchallenged in court. A major legal shortcoming tied to this issue is the absence of effective legal mechanisms to contest prosecutorial decisions that terminate criminal proceedings, which prevents significant corruption cases from being brought to trial. This problem has been raised by the Council of Europe and judicial reform advocates, who stress the need for expanded judicial oversight over prosecutorial actions. A prominent example of this issue is the "Eight Dwarfs" case, a major corruption investigation involving allegations of undue influence and misconduct within the judiciary. The investigation into this case has faced considerable setbacks, including the dismissal of charges and limited judicial review, highlighting the urgent need for legislative reform in this area. (Center for the Study of Democracy, The State of Capture. The Elusive Quest for Anti-Corruption Results, Policy Brief No. 144, Apr 2024, see: <https://csd.eu/publications/publication/the-state-of-capture/>).

Another recurrent challenge highlighted by experts and observers is the standard of proof used in the criminal justice process, particularly during the pre-trial phase. It appears that the Prosecutor's Office prioritises cases with indisputable evidence, seeking to secure convictions in such cases, which may further hinder the pursuit of justice in complex corruption matters.

Any other developments related to the anti-corruption framework - please specify

5000 character(s) maximum

The lack of significant progress in the investigation of Emilian Gebrev's poisoning could illustrate several systemic rule-of-law challenges pertinent to Bulgaria's assessment in the EU Rule of Law Report. This case reflects vulnerabilities tied to state capture, media disinformation, and weak institutional capacity. Despite evidence implicating Russian agents and geopolitical implications for national security, the investigation

lagged until external pressure from the UK brought limited action, showcasing gaps in Bulgaria's judicial independence and accountability mechanisms. In 2024, it was revealed that the prosecutor overseeing Gebrev's case was a member of social media fan groups dedicated to Vladimir Putin and Russia, raising serious concerns about potential conflicts of interest and the impartiality of the judicial process. Furthermore, the surrounding disinformation campaigns and delayed judicial responses emphasize the interconnected challenges of hybrid threats and the institutional inertia that undermine Bulgaria's resilience against foreign malign influence and hybrid warfare tactics. (See: <https://csd.eu/publications/publication/countering-hybrid-threats-in-bulgaria/> and this one <https://csd.eu/publications/publication/disinformation-storm/>)

III. Media pluralism and media freedom

Please provide information on measures taken to follow-up on the recommendations received in the 2024 Report regarding media pluralism and media freedom (if applicable)

5000 character(s) maximum

A. Media authorities and bodies

(Cf. Article 30 of Directive 2018/1808)

Measures taken to ensure the independence, enforcement powers and adequacy of resources (financial, human and technical) of media regulatory authorities and bodies

5000 character(s) maximum

Conditions and procedures for the appointment and dismissal of the head / members of the collegiate body of media regulatory authorities and bodies

5000 character(s) maximum

Existence and functions of media councils or other self-regulatory bodies

5000 character(s) maximum

B. Safeguards against government or political interference and transparency and concentration of media ownership

Measures taken to ensure the fair and transparent allocation of state advertising

5000 character(s) maximum

Safeguards against state / political interference, in particular:

- safeguards to ensure editorial independence of media (private and public)
- specific safeguards for the independence of heads of management and members of the governing boards of public service media (e.g. related to appointment, dismissal), safeguards for their financial and operational independence (e.g. related to reporting obligations and the allocation of resources) and safeguards for plurality of information and opinions
- information on specific legal provisions and procedures applying to media service providers, including as regards granting/renewal/termination of licenses, company operation, capital entry requirements, concentration and corporate governance

5000 character(s) maximum

Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners

5000 character(s) maximum

C. Framework for journalists' protection, transparency and access to documents

Rules and practices guaranteeing journalists' independence and safety, including as regards protection of journalistic sources and communications, referring also, if applicable, to follow-up given to alerts lodged with the Council of Europe's Platform to promote the protection of journalism and safety of journalists

5000 character(s) maximum

Law enforcement capacity, including during protests and demonstrations, to ensure journalists' safety and to investigate attacks on journalists

5000 character(s) maximum

Access to information and public documents by public at large and journalists (incl. transparency authorities where they exist, procedures, costs/fees, timeframes, administrative/judicial review of decisions, execution of decisions by public authorities, possible obstacles related to the classification of information)

5000 character(s) maximum

Lawsuits (incl. SLAPPs - strategic lawsuits against public participation) and convictions against journalists (incl. defamation cases) and measures taken to safeguard against manifestly unfounded and abusive lawsuits

5000 character(s) maximum

Any other developments related to media pluralism and freedom - please specify

5000 character(s) maximum

The state of media freedom and financing across Europe, particularly in Central and Eastern Europe remains precarious with the existence of many local “media deserts” (see: <https://csd.eu/publications/publication/supporting-media-freedom-in-europe/>). Persistent market failures, exacerbated by the dominance of Big Tech in digital advertising (even more pronounced in small language markets), have weakened traditional media models, leaving outlets vulnerable to financial instability and media capture. This is particularly concerning in politically fragile environments, where media ownership concentration and government interference compromise editorial independence. To address these challenges, the EU should expand mechanisms like the European Media Freedom Act and NEWS Initiative, fostering equitable financing frameworks and transparent allocation of public funding. The European Commission could pilot media-tech funding initiatives in CEE and leverage private sector financing through blended finance schemes, which could also benefit from the foreseen further integration of the European capital markets. Measures to counter foreign interference and disinformation, along with investment in digital transformation and media literacy, should also be reinforced as part of broader efforts to safeguard democratic values.

EU candidate countries, such as those in the Western Balkans and Eastern Partnership need to address systemic vulnerabilities in their media ecosystems (see: <https://csd.eu/publications/publication/media-financing-in-europe/>). Aligning media laws with EU standards, improving transparency in media financing, and combating political interference are essential steps. These nations face unique pressures from foreign malign actors and limited access to sustainable funding models. Supporting local media through EU programs, offering capacity-building initiatives, and ensuring resilience against external manipulation should be key priorities in the ongoing accession process. These efforts would not only strengthen media freedom but also align candidate countries with the democratic principles of the EU.

IV. Other institutional issues related to checks and balances

Please provide information on measures taken to follow-up on the recommendations received in the 2024 Report regarding the system of checks and balances (if applicable)

5000 character(s) maximum

In 2024, many of the Bulgarian judicial institutions continue to act beyond the timeframe of the mandates of their leadership, including: the Supreme Judicial Council, the Inspectorate of the Supreme Judicial Council, the Commission for Personal Data Protection, the Commission for Protection against Discrimination etc. Political instability - frequent elections, lack of a regular government, etc. can no longer be an excuse for this. Two post-conflict parliaments could fill their quotas in these public institutions, which, by virtue of the interpretative decision of the CC 12/27.09.22 on the SJC and the IHJ, these and other public institutions shall continue to hold office until new members are appointed. (<https://www.constcourt.bg/bg/Acts/GetHtmlContent/2ddbc14c-bcdc-4e8c-afb6-f2442517228a>)

This not only affects the legitimacy of these institutions, but also seriously undermines the entire system of checks and balances, further politicises the long-delayed future election of the heads and members of these institutions, and leads to a further decline in the already low level of public confidence in them. On the other hand, it blocks the planning and implementation of any serious reforms in the executive and the judiciary.

A. The process for preparing and enacting laws

Framework, policy and use of impact assessments and evidence based policy-making, stakeholders'[1]/public consultations (including rules and practices on the transparent participation of civil society to policy development and decision-making processes), and transparency and quality of the legislative process both in the preparatory and the parliamentary phase

[1] This includes also the consultation of social partners

5000 character(s) maximum

The transformation of the National Assembly into a permanently functioning legislative body (until the next one is elected), following recent constitutional amendments, has made it possible to pass laws during the work of caretaker governments. However, the high level of fragmentation has made this difficult to implement. As a result, two successive parliaments have failed to pass important legislation, and some of the laws that have been passed have been met with not only confusion but also much criticism. Moreover, they are considered and adopted in violation of legal procedures (the Statutory Instruments Act) - they are usually submitted by a group of MPs or parliamentary groups, they do not go through procedures of coordination, public consultation, impact assessment, etc.

In August 2024, Bulgarian Parliament adopted highly controversial amendments to the Preschool and School Education Act banning the "propaganda" of "non-traditional sexual orientation" among children. The amendments, originally submitted by the Vazrazhdane (Revival), were adopted without consulting the relevant public institutions and without an open public consultation process. Supported by several other parties (GERB, DPS, ITN and BSP) the amendments are intended to end any possibility of discussing LGBT+ issues in school. Several protests were organised calling on the President to veto the bill, but to no avail. Proof of the danger of such legislation is the initiative of Vazrazhdane, which followed soon after the changes, to make public the names of teachers from Varna, Bulgaria's third largest city, who signed a petition against the new law, putting their reputation and even personal security at risk. The names were subsequently deleted from social media, and the prosecutor's office opened an investigation, but no results have been publicly announced yet.

It is also important to note that in 2024 pressure and safeguards on vulnerable groups and civil society from extremist and populist political parties increased. Anti-LGBTI+ legislation has been extended beyond the national level but also to the local level. Several municipalities have proposed bylaw legal amendments targeting advertising and information activities within the territory of the municipality. These amendments explicitly prohibit "promoting individuals, organizations, and communities advocating for non-traditional sexual orientation or gender identities differing from biological sex." No public information is available on whether these amendments were adopted.

In 2024, the Vazrazhdane party submitted to three consecutive parliaments a draft law for the registration of foreign agents, very similar to the Russian one, which proposes that any individual or legal entity that has received annual funding of more than 1,000 leva (nearly 500 euros), excluding EU subsidies, should be banned from any activity in the field of media, social work, charity, etc. Recipients of such funding are defined as "foreign agents" and are subject to registration with the Ministry of Justice, and this status will also have to be mentioned on the person's websites, publications and business cards. As a result of strong criticism, exceptions were made in the last submitted draft law for education and healthcare. Most parliamentary parties, as well as NGOs, opposed the draft. However, there are serious concerns that some of the stigmatizing provisions can be reproduced in the regulation of lobbying activities.

Rules and use of fast-track procedures and emergency procedures (for example, the percentage of decisions adopted through emergency/urgent procedure compared to the total number of adopted decisions)

5000 character(s) maximum

Fast track procedures continue to be used mainly to vote on controversial bills without coordination with the other relevant institutions and without broad expert and public consultation. One of the most notable examples of this practice was the adoption of the amendments to the Preschool and School Education Act banning the “propaganda” of “non-traditional sexual orientation” in school. The law was rushed through the fast-track procedure, with both readings completed in a single day and no substantive justification for the urgency. It was proposed by 'Revival' (Vazrajane; member of the Europe of Sovereign Nations) and passed overwhelmingly, receiving support also from GERB (European People's Party), DPS, ITN (ECR group), and BSP (The Party of European Socialists).

LGBTI organizations were excluded from the legislative process; they were not invited to committee discussions, and their position statements on the bill were not published on the parliament's website.

The law contradicts rule-of-law principles and violates fundamental rights, including freedom of expression (specifically the right to receive and impart information and ideas without interference by public authorities and regardless of frontiers), the prohibition of discrimination, the right to education, freedom of thought, conscience, and religion, parental rights, and the right to respect for private and family life, including the right to health.

The overwhelming majority supporting this restrictive legislation emboldened far-right and populist factions, who subsequently proposed even more severe measures targeting the LGBTIQ+ community, including amendments to the Criminal Code. These proposals were not adopted or debated due to the collapse of the Parliament. However, similar restrictive legislation has been reintroduced in the current Parliament.

The enacted legislation has fostered a hostile and disabling environment for the LGBTI community and civil society organizations at large.

Bulgarian CSOs continue to call for a more proactive and supportive role from the European Union in addressing these developments, as stronger engagement and oversight remain critically important.

Rules and application of states of emergency (or analogous regimes), including judicial review and parliamentary oversight

5000 character(s) maximum

Regime for constitutional review of laws

5000 character(s) maximum

B. Independent authorities

Independence, resources, capacity and powers of national human rights institutions ('NHRIs'), of ombudsman institutions if different from NHRIs, of equality bodies if different from NHRIs and of supreme audit institutions

(Cf. the website of the European Court of Auditors: <https://www.eca.europa.eu/en/Pages/SupremeAuditInstitutions.aspx#>)

5000 character(s) maximum

For more than half a year, the Ombudsman institution has not had an Ombudsman and Deputy Ombudsman, even though two consecutive parliaments could have elected such persons.

Another national human rights institution - the national equality body - Commission for Protection Against

Discrimination - has had its chairperson, deputy chairperson and members' mandates expired for more than two years.

Statistics/reports concerning the follow-up to recommendations by National Human Rights Institutions, ombudsman institutions, equality bodies and supreme audit institutions in the past two years

5000 character(s) maximum

C. Accessibility and judicial review of administrative decisions

Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data)

5000 character(s) maximum

Judicial review of administrative decisions: short description of the general regime (in particular competent court, scope, suspensive effect, interim measures, and any applicable specific rules or derogations from the general regime of judicial review)

5000 character(s) maximum

Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)

5000 character(s) maximum

Implementation of final judgments by the public administration and State institutions and follow-up given to supranational judgments, including decisions from the European Court of Human Rights, as well as available remedies in case of non-implementation

5000 character(s) maximum

D. The enabling framework for civil society

Measures regarding the framework for civil society organisations and human rights defenders (e.g. legal framework and its application in practice incl. registration, transparency and dissolution rules)

5000 character(s) maximum

The year 2024 stands out as challenging for Bulgaria's civil society environment. Bulgaria still lacks a comprehensive framework for regulating civil society organizations' (CSOs) participation in democratic processes, with the last strategy adopted in 2015. While some consultative bodies under the Council of Ministers aim to facilitate CSO involvement in policymaking, their effectiveness remains limited.

The Civil Society Development Council, established to support civil society by reviewing legislation, monitoring strategies, and assessing public funding, is widely regarded as ineffective. Its work has been obstructed, and key obligations under the Non-Profit Legal Entities Act, such as annual reviews of CSO needs and achievements, have not been fulfilled. In response, CSOs have called for amendments to the Council's Rules of Procedure to ensure its continuity and functionality.

Other consultative bodies under the Council of Ministers also seek to engage CSOs in law and policy development. However, they face similar obstacles, including blocked operations and unmet mandates, further undermining civil society's role in democratic processes.

There is still no specific state support for human rights defenders. Strategic Litigation Against Public Participation (SLAPP) targeting journalists and human rights defenders remains a concerning issue.

Rules and practices having an impact on the effective operation and safety of civil society organisations and human rights defenders. This includes measures to protect them from attacks – verbal, physical or on-line –, intimidation, legal threats incl. SLAPPs, negative narratives or smear campaigns, measures capable of affecting the public perception of civil society organisations, etc. It also includes measures to monitor threats or attacks and dedicated support services, as well as available remedies

5000 character(s) maximum

Around the adoption of the Pre-school and School Education Act, many LGBTI organizations became targets of attacks, including the creation and distribution of a list naming teachers and their workplaces. The teachers on the list were allegedly identified for opposing the law changes, according to the political party Revival (Vyzrazhdane), who circulated the list. This is not the first time the party has used "lists" in such a manner; years ago, they published a list of about 800 people labelled as "foreign agents," revealing their personal data. In the latest case, the Commission for Protection against Discrimination ruled no violation had occurred.

Additionally, the Foreign Agents Act draft-law increased hostility towards the civil society sector and NGOs in particular. The most frequent targets of attacks are organizations that work on the issues of vulnerable groups (LGBTI, migrants, children, etc.).

Organisation of financial support for civil society organisations and human rights defenders (e.g. framework to ensure access to funding, and for financial viability, taxation/incentive/donation systems, measures to ensure a fair distribution of funding)

5000 character(s) maximum

There is no state funding or support available for civil society organizations or human rights defenders. While a framework exists to facilitate access to funding, it is ineffective due to the ongoing blockages in the work of the Civil Society Development Council.

E. Initiatives to foster a rule of law culture

If there have been developments related to initiatives to foster a rule of law culture, please specify, which (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, contributions from civil society, education initiatives, etc.)

5000 character(s) maximum

Anti-corruption is a frequent topic in Bulgaria's public dialogue, but its links to other systemic issues, such as gender inequality and gender-based violence (GBV), are rarely discussed. Both corruption and GBV are deeply rooted problems in the country, highlighting structural deficiencies in governance and the rule of law. Despite legislative amendments in 2023 related to GBV, Bulgaria has made limited progress in addressing

these issues. Key gaps remain, including the lack of a National System for Domestic Violence to coordinate institutions and collect data, an adopted coordination mechanism to ensure inter-agency cooperation and a sustainable financial framework to support NGOs providing critical services for GBV survivors. Notably, although 450,000 BGN was allocated for such support, the funds were ultimately returned to the state budget for 2024. Additionally, Bulgaria is currently implementing two decisions from the ECtHR related to gender-based violence.

The urgency of the situation is underscored by the alarming statistics: in 2024, at least one woman was killed due to GBV every month. This crisis, coupled with entrenched gender inequality, reveals how GBV intersects with broader rule-of-law challenges. Addressing these intersections is essential because systemic issues like GBV expose deeper governance failures and inequalities, ultimately eroding trust in institutions. A comprehensive approach to rule-of-law reforms that connects corruption to less traditionally recognized issues like GBV can help create more just and effective governance structures, ensuring equal access to justice and accountability across society. (see: <https://csd.eu/publications/publication/invisible-chains/>)

Gendered disinformation and pervasive gender inequality further erode the rule of law in Bulgaria by exploiting weak institutions, perpetuating systemic inequities, and fostering discrimination against vulnerable groups such as migrant women and LGBTIQ advocates. Limited legal protections, coupled with political reluctance to address these challenges, exacerbate mistrust in authorities and hinder access to justice. This inequality is starkly visible in the newly formed government, which includes only one woman, reflecting the persistent marginalization of women in leadership. These dynamics underscore the urgent need to strengthen institutional safeguards and address structural inequalities as an integral part of rule-of-law reforms. (See: <https://csd.eu/publications/publication/gendered-disinformation-challenges-for-ukrainian-refugees/>).

Any other developments related to the system of checks and balances - please specify

5000 character(s) maximum

Supporting document upload

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0f3a4b0d-28b9-4243-a382-a7a9f2e8f9b0/BRIEF_CSD_144_ENG_WEB.pdf
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