

INFORMATION
ON THE IMPLEMENTATION OF THE MEASURES INCLUDED IN
THE NATIONAL STRATEGY FOR PREVENTION
AND COUNTERING CORRUPTION IN THE REPUBLIC OF BULGARIA (2021-
2027) AND THE ROAD MAP FOR THE IMPLEMENTATION OF THE STRATEGY
FOR THE PERIOD
JANUARY - DECEMBER 2023

PRIORITY 1: STRENGTHENING THE CAPACITY AND INCREASING
THE TRANSPARENCY OF ANTI-CORRUPTION BODIES AND UNITS

- The measure to upgrade the capacity of the inspectorates as particularly important anti-corruption units has been partially implemented. The number of inspectorates established under Article 46 of the Law on Administration (except for the one under the Minister of Environment and Water, the Minister of Culture and the Minister of Education and Science) is in line with the requirements of the Regulation on the structure and minimum number of inspectorates, the procedure and manner of their activities and interaction with specialised control bodies. Some of the authorities which have established inspectorates have taken action to provide them with resources by holding competitions for the recruitment of civil servants or mobility procedures within the civil service, some of which have resulted in the appointment of inspectors (Ministry of Agriculture, Ministry of Education, Ministry of Labour and Social Affairs, Ministry of Science and Higher Education, Ministry of Education, Ministry of Science and Higher Education). The Ministry of Youth and Sports reports in 2023 the appointment of a Head of Inspectorate.

- With regard to the implementation of the activity "Improving the financial and resource capacity of inspectorates", some inspectorates noted that the issue of improving their financial capacity and therefore the motivation of inspectors, as well as the continued filling of their positions, remained pending.

- In 2023, the Inspectorate under the Minister of Environment and Water is considering initiating a procedure to increase its staffing. A similar procedure has been reported by the inspectorate of the National Revenue Agency.

- In the information presented on the reporting of the progress of the implementation of the measures of the strategy is established that there is a lack of human potential and trained

staff due to the specificity of the activity (Ministry of Foreign Affairs).

- No action has been taken to improve the financial security of the inspectorates, with the exception of the inspectorates of the Minister of Transport and Communications and the Minister of Regional Development and Public Works. In general, the inspectorates underline the need to improve financial security.

- Measure 2 "Establishment of an electronic platform for exchange of information on the exercise of the powers of the authorities under § 2 of the Additional provisions of the Law for Anticorruption on verification of declarations of assets and interests and establishment of conflict of interest" remains unimplemented.

- Within the deadline set for the implementation of the measure related to the development of a Code of Ethical Conduct for Persons Holding Senior Public Positions in the Executive Branch, it was not implemented.

- The continued and thorough cooperation of the Bulgarian institutions involved in the prevention and countering of corruption with international institutions and organizations was noted.

- Specialized trainings are reported as part of the implementation of Measure 3 "Upgrading the capacity of inspectorates as particularly important anti-corruption units", noting that there are no profiled trainings related to the specificity of the activity.

- With regard to the implementation of Measure 4 "Strengthening the capacity of the Inspectorate to the Supreme Judicial Council to prevent and countering corruption among the judiciary", it is pointed out that on 6 October 2023 the Law on Amendments and Supplements to the Judiciary System Act was promulgated in State Gazette No. 84. The amendments establish the power of the respective colleges of the Supreme Judicial Council (SJC) to adopt the Code of Ethical Conduct for Bulgarian Judges and the Code of Ethical Conduct for Bulgarian Prosecutors and Investigators, respectively, and of the Plenum of the SJC to approve them. The activity is in implementation of a measure of the National Recovery and Sustainability Plan (NRRP). Additions have also been made to the ability of the SJC to: make proposals to the relevant SJC collegium to amend and supplement the Codes; organise and conduct anti-corruption training, as well as training to strengthen the integrity and independence of judges, prosecutors and investigators and conflict of interest, independently of the training provided by the National Institute of Justice (NIJ); adopt a template for reporting on the completion of cases within the statutory deadlines; adopt a procedure for regular reporting and publishing of the results of analysis and the summary of the closed cases; annually summarizes the good and bad practices in regard to the compliance of rules for

ethical conduct in respect to the relevant European and international standards and provide an information to the colleges of the Supreme Judicial Council.

- In the framework of the implementation of measure 6 "Promote activities to increase transparency in the activities of the executive authorities", the executive authorities indicate that they maintain up-to-date information on their websites. The reports on the measure indicate that publicity measures are included in some of the anti-corruption plans for 2023.

- Additionally, measures such as maintaining public registers of declarations under Article 49 of the Law on Anticorruption, informing the public about the policies pursued - through press releases, meetings with the media, briefings, interviews, as well as with the regular publication and updating of information on the websites and Facebook profiles, documents that regulate activities specific to the competent authority are also mentioned.

- From the beginning of 2023. the Patent Office has switched to a fully electronic service, publishing all decisions on disputes concerning national and international trademarks, geographical indications, industrial designs, as well as the decisions of the Boards on disputes concerning national and European patents, utility models, SPCs, etc.

- With regard to the implementation of Measure 7 "Strengthening the interaction between institutions involved in the prevention and countering of corruption, the competent institutions report on-the-spot checks carried out on contracts concluded for the provision of grant financial assistance from the EUIF, related to the administration of received signals of irregularities committed in violation of national and EU law.

- The Ministry of Finance also considers transparency measures in the context of the independent Open Budget Index (part of the International Budget Partnership's Open Budget Initiative) for 2023, pointing out that Bulgaria has a score of 79 out of 100 for budget transparency, which ranks the country 10th out of 125 countries.

- In connection with planned measures to ensure effective tax and social security control, a "winter campaign 2022" and an ongoing "summer campaign 2023" have been conducted. The effect of the implementation of the measure is aimed at reducing the risk of possible corrupt practices when carrying out checks on high fiscal risk goods and checks at commercial premises.

- In 2023, three joint Specialized Police Operations were conducted by the General Directorate "Fight against organized crime", two of them with State Agency for National Security and one with the Internal Security Directorate of the Ministry of Interior. A seminar was also held with the participation of officials from the General Directorate "Fight against organized crime", State Agency for National Security, Commission for Anticorruption and

Prosecutor's Office.

- The Commission for Anticorruption reports good interaction with OLAF, INTERPOL, Europol, CARIN, ALEFA, ARINSA, RRAG, EUROJUST, Egmont Group, Regional Anti-Corruption Initiative (RAI/RAI), GRECO, GRETA, European Partners Against Corruption (EPAC), European Anti-Corruption Contact Network (EACN), Network of Corruption Prevention Authorities - NCPA, Network for Integrity; the European Network of Integrity and Whistleblowing Authorities (NEIWA) and the International Association of Anti-Corruption Agencies (IAACA), and the European Public Prosecutor's Office.

- The Executive agency Audit of European Union Funds reports on the annual participation in technical and coordination meetings with the EC and OLAF in particular to discuss identified irregularities, fraud indicators and corrupt practices in the process of spending the EU funds.

- The Ministry of Education and Science acknowledges the systematic communication in the field of academic recognition with ENIC-NARIC centres, higher education institutions, citizens and competent authorities.

- The main areas in which the Ministry of Interior and the Ministry of Internal Affairs have worked in the period 2023-2024 are focused on developing strategic partnerships with international organizations, such as the EU and others, to exchange experiences and good practices in the fight against corruption.

- The Supreme Cassation Prosecutor's Office also reports on the participation of prosecutors in various international forums and informal meetings to strengthen cooperation in the fight against corruption.

PRIORITY 2: COUNTERING CORRUPTION CRIMES

- In implementation of measure 1 and measure 2 of the priority, the Law on amendment and supplement of the Criminal Procedure Code (promulgated in SG 48 of 2023) was adopted. The law introduces changes to ensure the efficiency of criminal proceedings and to increase the accountability and responsibility of the Prosecutor General in order to effectively fight against corruption and organised crime: efficient criminal proceedings; broadening judicial control in criminal proceedings through measures such as introducing judicial control over the prosecutor's decision to refuse to initiate criminal proceedings for a serious intentional crime; reducing formalism in the judicial phase, which leads to unjustified delays and inefficient proceedings, including reducing the possibilities for returning the case to the pre-trial phase;

introducing the right of the victim (possibly the whistleblower) to request the acceleration of criminal proceedings; introducing detailed rules on the resumption of criminal proceedings, including through the introduction of enhanced judicial control over discontinued proceedings.

- With regard to measure 3, it is pointed out that it is not up-to-date in view of the new legal framework contained in the Law on Anticorruption, promulgated by SG 84 of 2023.

- Employees of the control units in the administration participate in various specialized trainings related to corruption prevention and counteraction measures (Ministry of Interior, NIJ, Prosecutor's Office). Within the framework of the ongoing training of judges, prosecutors, investigators and other representatives of the professional community, the NIJ has conducted training activities involving judges, prosecutors, investigators, Ministry of Interior officials, SANS officials, judicial assistants, prosecutorial assistants, judicial officers, foreign participants and others, covering the substantive and procedural aspects of preventing and countering corruption. The Institute has coordinated the participation of Bulgarian magistrates in trainings abroad in the framework of cooperation with the European Judicial Training Network. Compulsory initial training has been completed by candidates for junior magistrates and initially appointed prosecutors in district prosecutor's offices. Self-learning courses have been published on the e- learning portal of the NIJ.

- With regard to measure 5, the inspectorate staff have completed training on the application of the Whistleblower Protection and Public Information Disclosure Act (WPPIDA), the prevention and identification of conflict of interest, etc., and with regard to the implementation of measure 6, they report the referral of whistleblowers to the prosecution authorities.

- Mechanisms have been established to monitor the implementation of the measures included in the Anti-Corruption Plans, with six-monthly and annual reports on the implementation of the measures (including for secondary authorising officers). To mitigate the corruption risk in the Ministry of Interior, pre-trial proceedings have been initiated in 2023 against Ministry of Interior officials in various prosecution offices in the country.

PRIORITY 3: STRENGTHENING THE CAPACITY AND IMPROVING THE WORK OF BODIES WITH CONTROL AND SANCTION POWERS IN THE ADMINISTRATION

- In some of the departments (Ministry of economics and industry) internal rules for

the application of anti-corruption procedures have been developed and are in force, which aim to form an objective judgement of the sanctioning authority in each case of a violation regarding the penalty to be imposed on the offender.

- The activity "Preparation for the creation of a unified codification act in the field of administrative punishment" of measure 1 "Improvement of legislation in the field of control and sanctioning of the administration in order to limit the possibilities for corrupt practices" has not been implemented.

- An internal register of administrative and criminal proceedings is maintained (Ministry of economics and industry and Secondary Budget Officers).

- With regard to the implementation of Measure 3 "Introduction of an integrity checking system for employees in the administration holding positions with high corruption risk", only the Customs Agency has introduced and operates an integrity checking system - according to Article 10, para. 12 of the Customs Act and Ordinance No. N-1 of 03.06.2016 on the procedure and conditions for professional and psychological suitability for appointment and promotion in the Customs Agency. The Ordinance provides that the professional and psychological aptitude test shall include an integrity test. The professional and psychological aptitude test shall be carried out using standardized and validated tests for the Republic of Bulgaria.

- In 2023, as a result of an interdepartmental working group including representatives of the Commission for Anticorruption and the Ministry of Interior, a draft Methodology for Corruption Risk Assessment and Management in the Ministry of Interior was developed and presented to the Ministry of Interior.

- The Customs Agency has approved and applies the "Corruption Risk Assessment Methodology. In the beginning of 2023, within the framework of the implementation of the project "Development and implementation of a methodology for corruption risk assessment in the National Revenue Agency of the Republic of Bulgaria", as part of the pilot testing, a corruption risk assessment was carried out in all structures of the NRA. These actions have contributed to the initial identification of areas of potential corruption risk.

- The identification of risk factors by the Ministry of economics and industry and the secondary budget administrators is done by examining the external environment, including the legal framework, economic conditions and social aspects. A risk assessment methodology has been developed which includes quantitative and qualitative approaches such as surveys, interviews and document analysis. The classification of risks is divided into categories (e.g. high, medium and low) depending on likelihood and impact. The risk management strategy is

analyzed periodically.

- The Customs Agency reports that staff and resources are in place to carry out integrity checks.

PRIORITY 4: INCREASING TRANSPARENCY AND ACCOUNTABILITY OF LOCAL GOVERNMENT

- There are significant differences in the degree of implementation of the measures between larger and smaller municipalities. Larger municipalities have more resources and better administrative capacity, allowing them to implement more complex and comprehensive solutions.

- There are no significant regional differences in the level of implementation of the measures.

- In 2023, a significant number of Bulgarian municipalities (over 90%) successfully updated their websites in accordance with the "Rules for Institutional Identity of State Administration Websites and Portals". The content and structure of the websites have been brought in line with the minimum requirements for accessibility and user-friendliness.

- In 2023, municipalities significantly expand the catalog of electronic administrative services offered. Many of the municipalities have implemented the e-Forms system and the range of services has been extended.

- In the reporting year, about 65% of the municipalities analyzed provided some form of online access to the record systems. Many municipalities have implemented systems allowing citizens to check the status of filed documents with a unique code. There are differences in the level of implementation between larger and smaller municipalities, as well as in the degree of functionality of the access provided. Some point to the lack of sufficient financial resources as an obstacle.

- In 2023, most municipalities (about 75%) have published the mayors' management programs on their official websites and regularly publish annual reports on their implementation. Different approaches have been taken to promote them.

- All the municipalities analyzed comply with the legal requirements to publish the draft budget, hold a public consultation and publish the implementation reports. Some innovative practices were also observed, including the organization of a public debate with a live broadcast, the creation of a dedicated section on the website, etc.

- In the reporting year, about 70% of the analyzed municipalities maintained electronic registers of municipal property, available on their websites. Most of these registers include

information on municipal property deeds and property disposal transactions.

- The Ministry of Regional Development and Public Works has implemented a project "Establishment of a Property Management System, including a Unified Register of State and Municipal Property. In the beginning of February 2023, proposals for regulatory changes and a draft Terms of Reference for the construction of a property management system, including a Unified Register of State and Municipal Property, were prepared.

- Around 30% of the municipalities analyzed reported targeted activities to explore best European practices to increase efficiency, transparency and accountability. Smaller municipalities report that the measure has not been implemented or that no such practice has been identified.

- In 2023, about 50% of the municipalities analyzed report adopting specific ordinances or bylaws regulating public consultations and discussions. Most municipalities have established "Public Consultation" sections on their official websites.

- In the period 2023-2024, about 40% of the municipalities analyzed report the establishment of structures such as public or advisory councils, mainly in the larger cities. Some public-private partnerships have been established through various initiatives, and open consultations with businesses through joint working groups have taken place.

- Some of the municipalities analyzed reported having developed and implemented procedures for verifying reports, including logging, distribution, verification and reporting. Some municipalities publish summary information on the alerts investigated and the actions taken, while others provide information only to the alert sender.

- A large majority of municipalities noted that no reports of unethical conduct or conflict of interest were recorded in 2023.

- Low citizen engagement: despite municipalities' efforts to increase transparency and citizen engagement, many report relatively low engagement from the local community.

PRIORITY 5: FREEING CITIZENS FROM "PETTY" CORRUPTION

- The Law on Anticorruption and Illegally Assets Forfeiture (LACIAF) was amended by the Law on Anticorruption, promulgated in the State Gazette No. 84 of 06.10.2023. With the adopted legislative amendments, the Commission for Anticorruption and Illegally Assets Forfeiture (CACIAF) was divided into two bodies - the Commission for Anticorruption (CAC) and the Commission for Illegally Assets Forfeiture (CACIAF). The amendments provide for a broad subjective scope of the law, including 52 categories of persons holding public office.

- Initial and on-going trainings on verification of declarations and identification of conflicts of interest continued, including with the participation of officials from the inspectorates under Article 46 of the Law on Administration.

- Some of the inspectorates provide periodic methodological guidance to the secondary budget administrations, and working meetings with their representatives are also organized.

- Consultations have been provided on the activities of preparation of anti-corruption plans, reports and their reporting in relation to the implementation of the envisaged anti-corruption measures according to the Guidelines of the National Council for Anticorruption Policies.

- In Decree No. 232 of 20 November 2023 on the adoption of a schedule for the alignment of the registers of administrative bodies with the Law on e-Government through the use of the Information System for the centralized construction and maintenance of registers, in item 2.2. is entered the Register of declarations under Art. 49 (1) of the Law on Anticorruption submitted by persons appointed or designated by the appointing or electing authority under Para.2 (2) of the Additional Provisions of the Law on Anticorruption.

- The measure concerning the preparation of a Concept Note for the development of specialized software to enable the reception, storage and processing of declarations submitted under the LACIAF has not been implemented.

- In order to facilitate and accelerate the verification of declarations of property interests in 2023, work continues on the upgrade of the software product "Declarations under Art. 35 of the LACIAF ", developed by "Information Services" JSC in 2019, regarding the reception and storage of declarations submitted by NRA employees.

- Internal whistleblowing channels have been established in accordance with the Whistleblower Protection Act. The Internal Rules for the Management of Public Procurement regulate the hypothesis of notification of the Contracting Authority by members of a committee in cases of pressure to take an unauthorized decision in favor of a candidate or participant.

- Measures have been taken to update the legal framework of the established regulatory regimes in order to reduce administrative and regulatory burdens, including with a view to creating an optimal business environment. Some of the institutions report that there is legal analysis of existing regulations, optimization of procedures, opportunity for self- assessment, training and consultation, feedback from stakeholders, and periodic review of regulations.

- The development of the digitization of administrative services continues. Some institutions provide the possibility to request administrative services signed with a qualified

electronic signature (QES), while others report that administrative services are described and available both on their website and on the electronic portal for electronic services of the Ministry of e-Government. New services are being introduced and the process of requesting and processing existing services is being improved and facilitated.

- Efforts are ongoing to establish an effective whistleblowing system for corruption and conflict of interest and to disclose the actions taken on the reports. The institutions report that the necessary arrangements have been put in place to allow reports of corruption or conflict of interest to be made through different channels. Some institutions report that regular training sessions are held for procurement officers focusing on ethics, anti-corruption practices and new legislative amendments.

- Round tables and trainings, including specialized ones, have been held in order to improve the professional qualification of administrative staff working in the field of public procurement.

- The Ministries and the secondary budget administrators continue to apply random spot-checks and rotation of teams carrying out control and licensing activities, of experts responsible for the preparation and conduct of public procurement, and of staff working in places with high corruption risk. The implementation of the measures in the institutions' anti-corruption plans is also monitored.

- The Customs Agency applies several types of rotations of customs officers, including to limit the risk of corruption: transfer of customs officers to perform temporarily the same or another service within the customs administration; rotation of customs officers with the assignment of a new workplace, random assignment of customs officers at the border posts at the beginning of the work shift, through the use of appropriate software.

- In accordance with internationally recognized auditing standards, a system for quality assurance of audit activities, including independence and objectivity of audit assessments, has been established in the Executive agency Audit of European Union Funds. Part of this system is the rotation of auditors, which together with the application of a single audit methodology, the team principle, three levels of control of audit work and continuous professional training contributes to the high quality of audit reports and their acceptance by donors. The Ministry of Defense notes that due to the lack of an established corruption risk assessment methodology, no corruption risk assessment is carried out.

- The Ministry of Defense has a Permanent Anti-Corruption Council chaired by the Minister of Defense.

- In order to improve the effectiveness of the anti-corruption plans and measures of the

bodies, the Commission for Anticorruption annually conducts an analysis and evaluation of the implementation of the Guidelines for the preparation of anti-corruption plans.

- In December 2023 the Public Enterprises and Control Agency has drafted a Code of Ethical Conduct for Persons Employed in State-Owned Enterprises. The Agency has implemented and maintains a Public Enterprises Electronic Information System on its website through which the financial and non-financial information of public enterprises is disclosed.

PRIORITY 6: CREATING AN ENVIRONMENT OF PUBLIC INTOLERANCE TOWARDS CORRUPTION

- In line with the NRRP stage and the commitments to transpose Directive (EU) 2019/1937 on the protection of whistleblowers into national law, a Whistleblower Protection Act has been adopted, enter into force on 04.05.2023, published in Official Gazette No. 11 of 2 February 2023. The law regulates the conditions, procedure and measures for the protection of persons, both in the public and private sector, who report or publicly disclose information on infringements of Bulgarian legislation or EU acts. Pursuant to the law, obliged entities have established an internal whistleblowing channel.

- Measure 2 "Inclusion of business to create an environment intolerant to corruption through integrity" has not been implemented.

- The topic "Prevention and Counteraction of Corruption" is included as a framework requirement in the organization of the class for students from 5-12 grade. In the form of interest-based activities, junior high and high school, students can study "civic education" on topics including anti-corruption issues.

- Pursuant to the commitment made in the process of accession to the Organisation for Economic Co-operation and Development (OECD) to ensure compliance of national legislation with the Council Recommendation on the Principles of Transparency and Integrity in Lobbying OECD/LEGAL/0379 and in implementation of a measure of the NRRP, the Ministry of Justice has prepared a draft Concept for the Regulation of Lobbying Activities in the Republic of Bulgaria, which has been published for public consultation on the website of the Ministry and on the Portal for Public Consultations. The Concept for the Regulation of Lobbying Activities in the Republic of Bulgaria aims to define the scope of public relations in the field of lobbying and to structure proposals for changes in the legal framework so that these relations are regulated in a sustainable and transparent manner with established rules.

- Measure 5 "Study of good practices, as well as collecting and summarizing proposals from the members and the Citizens' Council of the NCACP, stakeholders and institutions for

taking concrete measures to increase the effectiveness of activities to prevent and counter "electoral corruption" and to increase public intolerance to this type of corruption" was not implemented.

PRIORITY 7: TIMELY RESPONSE TO THE NECESSITY OF UPDATING THE ANTI-CORRUPTION MEASURES INCLUDED IN THE NATIONAL STRATEGY FOR PREVENTING AND COUNTERING CORRUPTION, INCLUDING IN RESPONSE TO RECOMMENDATIONS MADE BY INTERNATIONAL INSTITUTIONS

- In order to draft an updated National Strategy for Prevention and Countering Corruption in the Republic of Bulgaria (2021-2027) and its Roadmap, an interdepartmental working group with representatives of the responsible institutions mentioned in the Roadmap was established by the Order № P-150 of 24 August 2023 of the Prime Minister.

According to the order, the interdepartmental working group reviewed: the implementation of measures for the period 2021-2022 included in the National Strategy for Preventing and Countering Corruption (2021-2027) and its Roadmap; the measures and recommendations in the field of prevention and countering corruption included in the reports of the European Commission on the Rule of Law Mechanism (2023), the Group of States against Corruption (the Fifth evaluation round), the legal instruments of the Organisation for Economic Co-operation and Development (on specific instruments), as well as the measures included in the National Recovery and Resilience Plan (in the Business Environment section), with a view to supplementing the Strategy and Roadmap.

Main conclusions

The information provided by the responsible institutions on the implementation of the measures and activities included in the Roadmap for the Implementation of the National Strategy for Preventing and Countering Corruption in the Republic of Bulgaria (2021-2027) shows:

- For the implementation of the measures under the respective priorities, 84 actions have been identified and a total of 90 performance indicators have been provided for the actions to be undertaken by the responsible institutions. Of these indicators, 33 are continuously implemented, 13 are partially implemented, 14 are implemented and 30 are not implemented. The available statistical information shows that 33 % of the planned indicators have not been

implemented during the reporting period.

- There are no significant lessons to be drawn from the implementation of a particular measure in a way that supports the direction of the strategy and roadmap.

- Again, a significant part of the activities planned for the implementation of the measures overlap with statutory functions of structural units of the respective administrations, which essentially hinders strategic planning in the envisaged direction.

- Many of the set indicators contain a qualitative indicator that cannot measure the extent of the implementation of the measure, the progress achieved and the social impact made.

- Ministries and agencies continue to report activities assigned to them by law as anti-corruption measures assigned by a normative act (checks of declarations of incompatibility and of property and interests, scheduled/unscheduled checks by inspectorates), as well as those whose implementation was reported in a previous period.

- Formal reporting of the measures is found, as no analysis of the impact of their implementation on the activities of a particular department/sector, as well as the effect of their implementation on society and business has been carried out.

- Insufficient account is taken of the actions within the individual units and structures of the respective system in view of the specificities of their activities and the potential risk of corrupt practices.

- The Roadmap does not identify the lead institution responsible for the implementation of the relevant measures, and therefore there is a lack of coordination between the agencies responsible for their implementation.

- A significant element is the lack of funding for the actions set out in the Roadmap for the implementation of the measures of the National Strategy for Preventing and Countering Corruption (2021-2027), which hinders the possibility to fully implement and monitor the effectiveness of implementation.

- Some of the indicators for the implementation of the measures are incorrectly formulated in the Roadmap and therefore a uniform approach to their reporting cannot be ensured.

- The information on the implementation of the measures overlaps partly with the information provided to the Ministry of Justice in the framework of the preparation of the annual reports on the Rule of law in Bulgaria. Other information is provided by the inspectorates under Article 46 of the Law on Administration in the framework of the annual performance reports.

- There are important changes in the regulatory framework which have a significant

impact on the effectiveness, accountability and implementation of the measures of the strategy. As mentioned above, new legislation was adopted during the reporting year to counter corruption and ensure transparency and accountability in the activities of the Prosecutor's Office (the Law on Amendment of the Constitution of the Republic of Bulgaria, the Law on Anticorruption, the Law on amendment the Criminal Procedure Code, the Law on amendment of the Judiciary System Act). The amendments concern not only the institutions identified as responsible for the implementation of the measures, but also the future development of the functions envisaged through the amended legislation, which should be the subject of a new strategic approach.