

**INFORMATION ON
THE IMPLEMENTATION OF THE MEASURES INCLUDED IN THE NATIONAL
STRATEGY FOR PREVENTING 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 2024.**

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

- In 2024 continues the process of upgrade of the RegiX Info - Interregistry exchange of reference and certification data.
- The measure regarding the increase of the capacity of the inspectorates as particularly important anti-corruption units, with permanent duration, has been regularly implemented. Some of the inspectorates report compliance of their assigned number with the requirements under the Ordinance on the structure and minimum number of inspectorates, the procedure and method for carrying out their activities and their interaction with the specialized control bodies (Ministry of Agriculture and Food (MAF), Ministry of Labour and Social Policy (MLSP), Ministry of Innovation and Growth (MIG), Ministry of Finance (MF)). Checks carried out by the inspectorates are also reported within the framework of the implementation of the measure. Continuous actions are taken on the resourcing of the inspectorates under Article 46 of the Law on Administration (LoA), while vacant positions persist (MLSP, MIG, Ministry of Regional Development and Public Works (MRDPW), Ministry of Defence (MoD), Ministry of Culture (MC)).
- The MIG and the Ministry of Economy and Industry (MEI) report a raise in the remuneration of staff in budget organizations, while noting the existence of wage disparities and the lack of improvement in the financial security of inspectors.
- The MC and the Ministry of Environment and Water (MoEW) point out the adopted amendments to their constituent acts, which have increased the number of the inspectorates, but at the same time take into account the non-compliance with the requirement of Article 6, paragraph 3, item 5 of the Ordinance on the structure and minimum number of inspectorates, the procedure and method for carrying out their activities and their interaction with the specialized control bodies.

- The competent authorities report the participation of employees in anti-corruption trainings, with the exception of employees of the Inspectorate to the Minister of Youth and Sports (MoYS).

- The Ministry of Foreign Affairs (MFA) notes the lack of profiled trainings related to the specificity of the activity, as the trainings organized by Institute of Public Administration (IPA) do not fully cover the activities carried out.

- Every year, the Inspectorate of the MoD holds a seminar to improve the qualification of inspectors, which addresses topical issues related to inspection activities, including activities to prevent and counter corruption.

- It has been reported on numerous occasions that there is a lack of staff potential and trained staff due to the specific nature of the activity (MFA).

- No action has been taken to improve the financial security of the inspectorates, with the exception of the Minister of Economy and Industry. Overall, the inspectorates underline the need to improve their financial security.

- The competent authorities report that Measure 2 "Establishment of an electronic platform for the exchange of information on the exercise of the powers of the authorities under § 2 of the additional provisions of the Law on Anti-Corruption and Illegal Asset Forfeiture (LoACIAF) to verify declarations of assets and interests and to establish conflicts of interest" is not implemented.

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

- Bulgarian institutions involved in the prevention and countering of corruption continue their thorough cooperation with international institutions and organizations.

- 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 of the Supreme Judicial Council to prevent and counteract corruption among employees of the judiciary", the adopted Code of Ethical Conduct for Bulgarian Judges and Code of Ethical Conduct for Bulgarian Prosecutors and Investigators (amended and supplemented), published on the official website of the Supreme Judicial Council, are taken into account. On 19 December 2024, a draft Law amending and supplementing the Judiciary Act was published for public consultation. The Law was prepared by a working group formed by order of the Minister of Justice to ensure compliance of the Judiciary Act with the Law on

amending and supplementing the Constitution of the Republic of Bulgaria, promulgated by State Gazette No. 106 of 2023 and by Decision No. 13 of 26 July 2024 on Constitutional Case No. 1/2024.

- The National Institute of Justice reports on the training of employees, including Ministry of the Interior officials, judges, prosecutors, investigators, court assistants, prosecutorial assistants, court clerks and other members of the professional community. Additionally, the Institute has coordinated the participation of representatives of the Bulgarian judiciary in 21 trainings organized by partner schools in Member States. 64 employees have been trained, 36 judges initially appointed to district courts and 15 prosecutors initially appointed to district prosecutor's offices and 6 investigators from district investigation departments have completed a mandatory induction training course. Eight (8) self-learning resources for judges, prosecutors and investigators have been published, containing original works. The self-training resources have been distributed to all judicial authorities.

- In 2024, the Commission on Anti-Corruption (CAC) has submitted Codes and best practice studies on the topic. The CAC has provided the identified good practices in the area of codes of ethics in other countries, such as Lithuania and Cyprus, including the European Commission.

- 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 some of the anti-corruption plans for 2023 contain publicity measures.

- Additionally, measures such as maintaining public registers of declarations under Article 49 of the Act on Countering Corruption, informing the public about the policies - through press releases, meetings with the media, briefings, interviews, as well as by regularly publishing and updating information on the websites and Facebook profiles, documents that regulate specific activities of the competent authority.

- The website of the Executive Agency Audit of European Union Funds contains an up-to-date information on the activities of the Agency and on the methodology applied by the Agency for the implementation of audit engagements. An analysis of the irregularities identified in audit engagements and a summary of the restrictive covenant breaches encountered in the practice of the Audit Authority and guidance on how to avoid them are prepared annually and published on the above-mentioned page. In 2024, an Analysis of the results of audits of management and control systems during the programming period 2021-2027 and an Analysis of the findings of the checks on the physical implementation of operations involving works during the programming period 2014-2020 have been prepared.

- The MC report Ordinance No. N-4/14.06.2007 on the conduct of competitions for directors of state cultural institutes, which stipulates that audio-video monitoring and audio-video recording are provided during the competitions as a measure to protect activities of public interest.
- All decisions of the President of the Patent Office 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. are published in a timely manner.
- The MEI reports that the Anti-Bribery Management System in accordance with BDS ISO 37001:2016 has been discontinued as of the end of July 2024 due to lack of financial resources and administrative capacity to maintain it.
- In 2024, an updated Handbook on procedures in the permitting process for projects of common interest and projects of common interest on the European Union (EU) list in the Republic of Bulgaria was published, pursuant to Article 9(1) of Regulation (EU) 2022/869 of the European Parliament and of the Council of 30 May 2022 on guidelines for trans-European energy infrastructure.
- The "Internet Reception" on the CAC website continues to function, which provides the possibility for interested parties to submit queries electronically.
- By Order No. 8121z-1571 of 06.11.2024 of the Minister of the Interior and Chairman of the Coordination Council for the fight against offences affecting the financial interests of the EU, an inter-ministerial working group was established to assist in the processes of drafting a methodology, evaluation and update of the National Strategy for the prevention and fight against irregularities and fraud affecting the financial interests of the EU for the period 2021-2027.
- A Whistleblower Form has been created on the official website of the Ministry of Finance, and information on the transparency policy for the management and control of EU funds and the institutions and e-mail addresses where citizens can report irregularities has been published in the "EU project whistleblowers" directory.
- In 2024, joint control was carried out by teams of the National Revenue Agency (NRA), the Ministry of Interior, the Commodity Exchange and Wholesale Markets State Commission, the Regional Health Inspectorate, the Commission for Consumer Protection, the Bulgarian Food Safety Agency, the Executive Agency "General Labour Inspectorate", the General Directorate Countering Organized Crime (GDCOC), the State Agency for National Security, etc. Joint inspections were carried out in different types of commercial establishments.

- In order to achieve effectiveness in countering corruption, the Ministry of Interior (MoI) interacts with institutions involved in the prevention and counteraction of corruption. There is active interaction with the CAC, the Public Prosecutor's Office of the Republic of Bulgaria, the European Public Prosecutor's Office, the State Fund for Agriculture and the managing authorities of European programmes. Inter-institutional working meetings have been held with the Bulgarian Drug Agency, the Executive Agency "Medical Supervision", the National Health Insurance Fund, etc., and timely exchange of information has been carried out when necessary.

- In connection with the newly adopted mechanism for the investigation of the Attorney General, the Ministry of the Interior has established an organization for interaction with the Acting Attorney General for the investigation of crimes committed by the Attorney General or a Deputy Attorney General. By order of the Minister of the Interior, officers from the DGCOC have been appointed to carry out inspections pursuant to Article 145, paragraph 1, item 1 and 3 of the Judiciary Act on criminal investigations initiated against the Prosecutor General or Deputy Prosecutor General. The Directorate applies an integrated approach, exchanges good practices and has an active partnership with international institutions and organizations, the European Public Prosecutor's Office in particular, and exchanges information through Europol channels.

- 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 corruption", the competent institutions report that on-the-spot checks have been carried out on contracts concluded for the for financial assistance under the European Structural and Investment Funds, related to the administration of received signals on irregularities committed in violation of national and EU law.

- The CAC reports interaction with OLAF, Interpol, Europol, CARIN, ALEFA, ARINSA, RRAG, EUROJUST, Egmont Group, Regional Anti-Corruption Initiative, 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), the International Association of Anti-Corruption Agencies (IAACA) and the European Public Prosecutor's Office.

- The Executive Agency Audit of European Union Funds annually participates in technical and coordination meetings with the European Commission and OLAF in particular to discuss identified irregularities, indicators of fraud and corrupt practices in the spending of EU funds.
- The Ministry of Education and Science (MoES) acknowledges the systematic communication carried out by the National Center on Information and Documentation in the field of academic recognition with ENIC-NARIC centers, higher education institutions, citizens and competent authorities.
- The Patent Office of the Republic of Bulgaria maintains a close cooperation with the World Intellectual Property Organization (WIPO), the European Union Intellectual Property Office (EUIPO) and the European Patent Office (EPO) in relation to the harmonization of the national legal framework with the European legislation on the protection of industrial property objects, the digitalization to the maximum extent of the provided administrative services, the digitalization of the specialized documentation, the optimization and digitalization of the working processes on the expertise and the safeguard of intellectual property and raising citizens' and business representatives' awareness on industrial property rights.
- The Supreme Cassation Prosecutor's Office reported 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

- Prosecutors from the Supreme Cassation Prosecutor's Office continue to participate in an inter-ministerial working group, formed by order of the Minister of Justice, with the task of drafting legislative amendments in relation to the recommendations of the Phase 4 report for the Republic of Bulgaria of the OECD Working Group on Countering Bribery in International Commercial Transactions.
- Institutions state that Measure 3 is not aligned to the new legal framework contained in the Act on Countering Corruption (promulgated in State Gazette No. 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, Prosecutor's Office of the Republic of Bulgaria, National Institute of Justice). In connection with planning, organizing, conducting and controlling the on-the-job training of civil servants referred to in Article 142, par. 1, item 1 of the Law on the Ministry of the Interior in the academic year 2024, training sessions on topical issues of anti-corruption were conducted at the General Directorate

National Police. With regard to the organization of the activity of detecting disciplinary offences and imposing disciplinary sanctions, training was provided to officers with police powers.

- Prosecutors and investigators are actively involved in national and international trainings on countering corruption crimes. In 2024, 8 trainings were held, in which 89 prosecutors and 49 investigators participated.

- 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 the Secondary Budget Officers (SBOs). In the period 2023-2024, the Executive Agency Audit of European Union Funds has received 19 signals in relation to identified suspicions of fraud in the results of audit work. In relation to corruption risk mitigation, a total of 109 pre-trial proceedings were initiated against MoI officials in various prosecution offices across the country in 2024 at the initiative of the Internal Security Directorate.

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

- The Ministry of Health (MoH) has developed guidelines on the exercise of administrative responsibility of regional health inspectorates.

- 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 (MEI and SBOs).

- With regard to the implementation of Measure 3 "Introduction of an integrity checking system for administrative officials holding positions with high corruption risk", only the Customs Agency has an integrity checking system in place and operational.

- The Customs Agency reports on the implementation of the approved "Corruption Risk Assessment Methodology". As a result of the Corruption Risk Assessment Methodology adopted by the NRA, a corruption risk assessment is reported to be launched in 2024.

- The identification of risk factors by the MEI and the SBOs 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 put place to carry out integrity checks.

PRIORITY 4: INCREASING TRANSPARENCY AND ACCOUNTABILITY OF LOCAL GOVERNMENT

- There are significant differences in the level 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.

- Measure 1 "Introduction of modern digital tools for an open and transparent municipality" builds on the achievements of the previous year. There is a trend towards introducing functionalities for live broadcasting of municipal council meetings. Some municipalities have created entirely new websites with improved accessibility, responsive design and tools for the visually impaired. Some of the smaller municipalities have implemented systems to broadcast municipal council meetings online. The focus on digital security has been strengthened, with additional measures taken to protect data and cyber security on municipal websites.

- In 2024, there is a deepening of the digitization process, with many municipalities having increased the level of service digitalization (reaching level 4 on the EU scale). New e-administrative services have been added, with a significant increase in some municipalities.

- In 2024, the percentage of municipalities providing online access to record systems increases to about 80%. The quality and functionality of the access provided has increased, and many municipalities have introduced new mechanisms to automatically notify users when their files move.

- In the framework of the implementation of Measure 2 "Enhancing efficiency, transparency and accountability in the management of public resources" in 2024, there has been

an increase in transparency in the reporting on the implementation of programmes for management, with published reports becoming more detailed and often including comparative analysis against targets. The way information is presented has improved, with many municipalities moving from a formal to a more user-oriented approach, including infographics, visualizations and simplified presentation of results. At the same time, some municipalities (Vetovo) report a lack of specific outreach measures beyond formal publication.

- In 2024, the quality of public deliberations on the budget is reported to increase, with more active involvement of citizens and information being presented in a more accessible way.

- There was an increase in 2024 in the share of municipalities maintaining electronic registers of municipal property to around 85% (from 70% in 2023). The quality of these registers has also improved, with many municipalities adding search and filtering functionalities, as well as geographic information systems (for property visualization. However, some municipalities (Roman, Galabovo) report difficulties in implementing electronic systems due to financial constraints or lack of technical capacity.

- As in the previous year, around 30% of the municipalities analyzed reported targeted activities to explore best European practices to increase efficiency, transparency and accountability. Smaller municipalities report difficulties in implementing this activity.

- Under Measure 3 "Public Consultations taking into account the interests of local communities", there has been an increase in the quality of public consultations in 2024, with many municipalities setting up dedicated sections on their websites for this purpose. Better mechanisms are in place for traceability of adopted proposals and for feedback to citizens. Some innovative practices have also been observed.

- In the period 2023-2024, about 40% of the municipalities analyzed reported establishing structures such as public or advisory boards. Public-private partnerships have been established in larger municipalities, but still represent an area for future development in smaller municipalities.

- Under Measure 4 "Enhancing the effectiveness of whistleblowing and sanctioning systems", the functionality of whistleblowing channels has improved, with many municipalities making efforts to raise citizens' awareness of whistleblowing opportunities and whistleblower protection.

- Between 2023 and 2024, about 75% of the municipalities analyzed reported having developed and implemented procedures for verifying reports, including logging, distribution, verification, and reporting. Some of the mechanisms are as follows: unique identification codes

established to track signals; an digital channel allowing anonymous signals; internal regulations for record keeping in 2024; a responsible committee that submits a report to the mayor.

- Between 2023 and 2024, about 60% of the municipalities analyzed report the existence of ethics committees or similar bodies. Of these, just over half publish information on their activities.

- A large majority of municipalities report that no reports of unethical behavior or conflicts of interest were registered in 2024, which is partly explained by the limited publicity in this area.

PRIORITY 5: FREEING CITIZENS FROM "PETTY" CORRUPTION

- In 2024, the implementation of Measure 1.1, which provides for the conduct of initial and on-going trainings in relation to the verification of declarations and the identification of conflicts of interest, continued, including with the participation of officials from the inspectorates under Article 46 of the LoA.

- Some of the inspectorates give periodic methodological instructions to the SOBs, as well as recommendations to improve the organization of work and prevent non-compliance with legal requirements. Practical issues related to the implementation of the anti-corruption legislation and the verification of declarations and the identification of conflicts of interest of the persons referred to in § 2, para. 1 of the LoAC. Consultations were also provided on the activities related to the preparation of anti-corruption plans, reports and their reporting in connection with the implementation of the anti-corruption measures envisaged under the NCACP Guidelines.

- The lack of an adopted Regulation on the organization and procedure for the verification of declarations and for the establishment of conflict of interest significantly hinders the work of the Inspectorate under Article 46 of the Law.

- It is noted that in the newly adopted LoAC (promulg. State Gazette No. 84 of 6 October 2023, as amended and supplemented. No. 13 of 13 February 2024) does not provide for the possibility for the persons subject to the election and appointment, within the meaning of § 2 of the Additional Provisions, to gain access to banking, tax, social security and insurance information on the persons subject to the audit. Measure 1.2 is therefore not implemented.

- With regard to Measure 1.3 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 LoACIAF, it should be noted that this has not been

implemented.

- In order to facilitate and accelerate the verification of declarations of property interests in 2024, the NRA continues work on the upgrade of the software product "Declarations under the LoAC" developed by "Information Services" JSC in 2019, regarding the reception and storage of declarations submitted by the NRA employees. The upgrade concerns the part of the automatic loading of data from the filed declarations in the public register, the provision of technical capability for electronic notification of compliance with the deadlines of the unfiled declarations when the deadline is approaching, as well as the reference part of the software product. All the necessary technical specifications and terms of reference have been developed for the implementation of the upgrade activities. It is expected that the upgrade activities will be finalized by May 2025. The implementation of the measure is expected to facilitate the process of receiving, processing and verifying declarations of assets and interests.

- In the implementation of Measure 2 "Limiting human intervention in the provision of administrative services through the continued development of digitalized administrative services", most of the responsible institutions have made progress in the implementation and development of electronic administrative services (MoF, MoI, MFA, MRDPW, MoEW, MEI, NRA, Geodesy, Cartography and Cadastre Agency, etc.). At the same time, a review of the administrative services provided by both the ministries and the SOBs has been carried out to identify opportunities to reduce the administrative and regulatory burden and to seek solutions for their electronic delivery.

- The Customs Agency takes into account the introduction of a complex administrative service, which allows the provision of public services without the need for the applicant to submit information or evidence, for which there are data collected by the administrative body performing the administrative service.

- The PPA points out that the integration between the Information System of the Commission for Protection of Competition and the Centralized Automated Information System "Electronic Public Procurement" has been upgraded in 2024, which enables the exchange of information between the two systems.

- The MoI and the MoES reported that for all administrative services provided by the them and their SOBs during the reporting period, the collection of information required by law when requesting services, which is contained in official registers, was ensured ex officio. Documents are requested only where they are not available in electronic registers.

- During this period, most of the institutions report that measures have been taken to update the legal framework of the established regulatory regimes in order to reduce the

administrative and regulatory burden (MAF, MoI, MoES, MEI, Ministry of Energy (MoE), MoYS, etc.).

- In 2024, new digital services were introduced and the process of requesting and processing of existing services was improved and facilitated (MoF, MoI, MRDPW, MoES, MEI, MoE, Ministry of Tourism, MoYS, PPA, NRA, Customs Agency, etc.) through the development and improvement of the existing communication and information systems. The implementation of the measure contributes to reducing direct contact with the administration by providing new and improving existing digital services with QES and/or PIN, while also reducing the administrative burden for individuals.

- There has been a significant improvement in the efficiency of processes, which includes the implementation of information technology and platforms facilitating interaction between citizens and government institutions through the creation of online platforms, automation of processes related to the submission of documents, processing of applications and issuance of permits, e-services by providing the opportunity for electronic submission of documents, payment of fees and obtaining permits without the need for physical presence in the offices. Transparency and traceability are ensured through the systems developed, which allow citizens to track the status of their applications and receive notifications on the progress of the processes.

- As a good practice, some institutions (MoI, MoES, MEI) carry out an annual survey of the satisfaction of users of administrative services, as well as periodic monitoring of the quality of services provided.

- Under Measure 3.1 on the provision of a mechanism for reporting cases of corruption or conflict of interest and disclosure of actions taken on the received reports in most of the ministries and SOBs (MoF, MoI, MFA, MRDPW, MoES, MC, MoSW, MEI, MoE, MoYS, NRA, Customs Agency, etc.) report the establishment of an internal whistleblowing channel under the Whistleblower Protection or Public Information Disclosure Act (WPWPDA). For this purpose, a section has been set up on their web pages and information on the conditions and procedures for whistleblowing has been published (MRDPW, MoEW, MEI, MoYS, the Executive Agency Audit of European Union Funds, PPA, etc.).

- In implementation of Measure 3.2 on improving the professional qualification of

administrative staff working in the field of public procurement, specialized trainings have been organized by Bulgarian and foreign training centers. On the basis of a Cooperation Agreement between the PPA and the IPA, since February 2024, trainings on public procurement have been conducted for the employees of contracting authorities, mainly bodies/organizations of the executive power - ministries and agencies, as well as representatives of municipalities, on conflict of interest and corruption issues.

- With regard to Measure 3.3, which provides for the development of e-procurement, new electronic standard procurement forms have been implemented in the EOPC in the reporting period. Integration between the CPC IS and the EOP CAIS has also been upgraded. Changes have also been introduced in the national model documents approved by the Executive Director of the PPA. The introduction of the new forms is reflected in an increase in the volume and quality of data provided by users. Access to them is free, unrestricted and direct, for any interested party, through the quick or advanced search options in the EOPC's ROP.

- Concerning Measure 3.4 on updating methodological guidelines and model documents, in 2024. The PPA reports 8 (new and updated) methodological guidelines prepared and published on the Public Procurement Portal, as well as 41 updated templates for public procurement.

- In the implementation of Measure 4.1, most ministries and their MDAs report the implementation of rotation activities for employees working in places at risk of corruption (MoH, MFA, Ministry of Transport and Communication, MLSP, MIG, MoF, MoI, MFA, MRDPW, MoES, MoEW, MEI, MoE, Ministry of E-Governance, MoYS, PPA, NRA, Customs Agency, the Executive Agency Audit of European Union Funds, Commission on Protection of Competition, etc.) - members of public procurement commissions, social welfare officers, inspectors in labour law inspection teams, licensing officers, customs officers, auditors, etc., in controlling positions. However, for some units it is reported that the requirement for staff rotation is not feasible due to lack of sufficient administrative capacity (MLSP, MFA, MoEW).

- Regarding Measure 4.2, the institutions report that the report on the implementation of the anti-corruption plan for the respective year includes a review of the implementation of all the measures included, including those on the rotation of employees working in places at risk of corruption. Some of them have even introduced a more regular review of the implementation of the measure in the structures.

- Regarding Measure 5.1, the ministries report that they continue to prepare annual anti-corruption plans and reports on their implementation in accordance with the Guidelines

adopted by the NCACP. These include measures to be implemented both by the administrative structures and units within the Ministries and by those in the SOBs. The anti-corruption plans and their implementation reports are published on the website of the relevant ministry.

- The Ministry of Interior reports that in order to implement the recommendations of the Group of States against Corruption (GRECO) of the Council of Europe in 2024, a Methodology for Corruption Risk Assessment and Management has been approved.

- With regard to Measure 5.2, which provides for an analysis and assessment of the need to amend the Guidelines for the preparation of anti-corruption plans and their content, the CPC notes that it carries out an annual analysis and assessment of the implementation of the Guidelines for the preparation of anti-corruption plans, preparing reports on the plans and reports on their implementation. Each of the reports contains proposals, guidelines and recommendations on the development of anti-corruption plans, their implementation and reporting on the outcome and effectiveness of the measures.

- As part of Measure 6.2 on promoting activities and measures to enhance transparency in the operations of public enterprises, the Public Enterprises and Control Agency reports that it prepares an annual summary analytical report on public enterprises, which includes information on the extent to which the enterprises' operations comply with applicable corporate governance and disclosure standards.

PRIORITY 6: CREATING AN ENVIRONMENT OF PUBLIC INTOLERANCE TOWARDS CORRUPTION

- The Ministry of Justice reports on the drafting, in January 2024, of an Act to amend and supplement WPWPDA. The final provision of the Act proposes amendments to the Local Government and Local Administration Act, which provide for: regulation for the adoption of a Code of Ethics for municipal councilors; the municipal council to elect from among its councilors a standing ethics committee to consider reports of breaches of the Code. The Commission will report and publish information on the number of reports of violations submitted and the acts enacted establishing violations by municipal councilors. The draft was adopted by Decision No. 907 of the Council of Ministers on 27 December 2024 and submitted to the 51st National Assembly for adoption.

- The Prosecutor's Office of the Republic of Bulgaria has created conditions for reporting under the (WPWPDA) and irregularities in the implementation of projects under the National Recovery and Resilience Plan.

- 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. The Grade 11 civics curriculum includes as an expected outcome for students to identify and assess the negative impact of corrupt practices in the electoral process. In civics classes and in class time, the issue of corruption is addressed in more detail in schools around the country that work under the Supreme Judicial Council's education program Judiciary - Informed Choice and Civic Trust. Open Courts and Prosecutor's Offices", designed for students from 5th to 12th grade.

- In 2024, on the basis of the Concept for the Regulation of Lobbying Activities in the Republic of Bulgaria, approved on 12 July 2024 by the Minister of Justice, the composition of the working group was updated, whose the activity focused on the preparation of legislative amendments for the regulation of lobbying activities, based on the approved concept. The work of the working group continues.

- Measure 5 "Study of good practices, as well as collection and synthesis of proposals from 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 increase public intolerance to this type of corruption" was not implemented.

PRIORITY 7: TIMELY RESPONSE TO THE NEED TO UPDATE THE ANTI-CORRUPTION MEASURES SET OUT IN THE NATIONAL STRATEGY FOR PREVENTING AND COMBATING CORRUPTION, INCLUDING IN RESPONSE TO RECOMMENDATIONS MADE BY INTERNATIONAL INSTITUTIONS.

- The activities presented demonstrate the need to update the current strategic framework to counter corruption.

- In the framework of the review of the accession of the Republic of Bulgaria to the OECD under Principle III "Strategy", the organization found that the lack of measurable outcome indicators and timelines, in line with established international standards and recommendations, and highlighted the lack of funding for the implementation of the measures, which essentially hinders their effectiveness.

Main conclusions:

The conclusions of the information provided by the responsible institutions on the implementation of the measures included in the National Strategy for Preventing and

Countering Corruption in the Republic of Bulgaria (2021-2027) reiterate those made within the information provided for the year 2023. The trend of reporting on already foreseen functional responsibilities of relevant structures/bodies continues, with measures being formally reported.

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. Out of the total number of performance indicators 35 are under implementation, 16 are partially implemented, 17 are implemented and 22 are not implemented. The available statistical information shows that 24 % of the set indicators have not been implemented during the reporting period.