

2026 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, six 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 2026 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 2026 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) developments and measures taken in relation to the recommendations in the 2025 report,
(2) developments related to topics covered in the 2025 country chapters, as well as any other new developments related to the rule of law.

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.

This questionnaire also integrates the separate questionnaire on the single market from last year. In addition to these specific questions, respondents to the questionnaire are invited to consider the Single Market dimension, including any relevant cross-border issues, in all their answers.

Where questions of particular relevance under the single market dimension, this is indicated before the relevant question.

[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 and enforcement 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.

Where relevant, please also indicate whether the developments reported are linked to the implementation of reforms and investments under the national Recovery Resilience Plan. 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.

* 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

Amnesty International Bulgaria

Main Areas of Work

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

If "Other", please specify

Human Rights

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

500 character(s) maximum

<https://www.amnesty.bg/>

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

* 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

Alexandra

Surname

Alexandrova

Email Address of the organisation

alexandra.alexandrova@amnesty.bg

* 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 as we will not be able to guarantee anonymisation of these elements.**
- ☒ 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 2026 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 for contribution.docx](#)

Please provide any relevant information on horizontal developments here

5000 character(s) maximum

Over the past year our reporting pointed to shared rule of law challenges across several EU Member States, including Bulgaria, Hungary and Slovakia, particularly in relation to civic space, participatory safeguards and institutional checks.

A key horizontal trend is the use of “foreign influence” or “sovereignty” narratives to justify increased scrutiny of civil society organisations. In Bulgaria, Amnesty International documented legislative initiatives targeting CSOs receiving foreign funding, including proposals advanced through accelerated parliamentary procedures. These developments mirror earlier measures in Hungary, where oversight mechanisms targeting CSOs and independent media have already been institutionalised, and parallel political and legislative pressure on civil society observed in Slovakia. Our organisation assesses this trend as undermining freedom of association and participatory lawmaking across the region.

Another cross-cutting concern relates to freedom of expression and media freedom. In 2025 we saw growing pressure on journalists and public commentators through defamation cases and hostile rhetoric, creating chilling effects on investigative reporting. Comparable patterns are identified once more in Hungary and Slovakia, where legal and regulatory changes affecting independent and public media weaken democratic accountability.

Finally, Amnesty International Bulgaria's 2025 observations highlight the instrumentalisation of polarising social and identity-based legislation, including restrictions affecting LGBTI rights and education, as a broader governance trend. In Bulgaria particularly, such measures have been accompanied by intimidation of educators and activists, reflecting dynamics already present in Hungary (especially the developments around Budapest Pride 2025) and contributing to a narrowing of pluralistic debate.

Overall, our end-of-the-year analysis indicates that developments in Bulgaria form part of wider horizontal EU-level trends characterised by shrinking civic space, pressure on independent media, and the erosion of human rights safeguards.

Questions for contribution

Under each pillar, you are invited to provide information on measures taken to implement the recommendations addressed to the Member State in the 2025 Rule of Law report, as well as developments with regard to the points raised in the respective country chapter of the 2025 Rule of Law Report and any other significant developments since January 2025 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 2025 Report regarding the justice system (if applicable)

5000 character(s) maximum

In January 2026, a special commission composed of members of the Supreme Judicial Council (SJC) and the Ministry of Justice conducted public hearings of seven candidates for the post of European prosecutor following the upcoming expiry of the incumbent's mandate. The proceedings involved a structured evaluation of professional qualifications, including experience in European delegation roles and prosecutorial leadership.

Subsequently, the selection panel nominated three candidates whose names were forwarded for approval by the Bulgarian Council of Ministers and will then proceed to EU-level appointment mechanisms. While this process remains ongoing, its proper conduct in line with the Rule of Law Report recommendations on openness and rigorous vetting is essential.

At the same time, the credibility of this follow-up is undermined by the institutional context in which the selection takes place. The procedure is conducted under the authority of the SJC, whose mandate expired in 2022 but which continues to exercise full powers due to prolonged political deadlock in the National Assembly. This "overstaying" of the SJC raises rule of law concerns directly linked to the EC's recommendations on timely renewal of judicial governance bodies, legal certainty, and insulation of the judiciary from political bargaining.

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 mid-July 2025, the Prosecutors' Chamber of the Supreme Judicial Council (SJC) decided that Sarafov would continue serving as Acting Prosecutor General even after 21 July 2025, despite a January 2025 adopted amendment to the Judicial System Law (JSL) that introduced a six-month cap on interim terms. The SJC held that the new rule did not apply to Sarafov's pre-existing mandate, and chose not to appoint a new acting prosecutor general.

On 2 October 2025, the Supreme Court of Cassation (SCC) issued rulings holding that Sarafov no longer had the authority to exercise the functions of Prosecutor General after 21 July 2025, on the basis of Article 173(15) of the Judicial System Law and the six-month limit introduced earlier in 2025. The court emphasized that, as a result, actions taken by him in his capacity as Acting Prosecutor General after that date could be procedurally invalid.

Despite the SCC's position, the Prosecutor's Office and the SJC have rejected that interpretation and have maintained Sarafov in office, arguing that the Prosecutorial College's 2023 appointment remains valid and can only be overturned by administrative litigation. This institutional pushback has left ambiguity about the scope and legality of his powers.

The situation continued to draw public criticism and protest actions against Sarafov's continued tenure, including demonstrations in Sofia that explicitly linked his extended incumbency to broader concerns about "politicisation" and lack of accountability in the prosecutorial leadership. In the meantime, judges in appeals divisions explicitly stated that, by law, the authority of a person appointed as acting prosecutor general should cease after six months following the legislative amendment of the Judicial System Law, and that continued actions could lack legal basis. This interpretation has been used to halt the consideration of some prosecutorial requests as invalid post-July 2025.

The changes to the Judicial System Law also affected the process of selecting a chair to the Supreme Administrative Court. The long-serving head of the court, Georgi Cholakov, had remained in his role beyond the expiration of his official term in late 2024 due to delays in electing a successor. By mid-October 2025, the Judicial College of the SJC formally addressed this leadership gap. On 14 October 2025, the College unanimously elected Judge Marinika Cherneva, the most senior deputy chair, as Acting Chair. She is to stay in the role until March 2026.

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

Last year the Judges' College of the SJC adopted a procedural rule for retirement-related releases. For instance, the Attestation and Competition Commission is yet to submit proposals for release within one month after a magistrate reaches the 65-year retirement threshold, explicitly justified as improving predictability and consistency of the timing of release.

In 2025, oversight and accountability mechanisms applicable to the Acting Prosecutor General, including special investigatory arrangements, were widely criticised for their limited effectiveness. Reports of terminated or stalled checks, coupled with institutional resistance to judicial interpretations limiting interim mandates, suggest a de facto accountability gap at the apex of the prosecution service.

Promotion of judges and prosecutors (incl. judicial review)

5000 character(s) maximum

A prominent 2025 illustration of court review over promotion-related decisions concerns the SJC Prosecutors' College refusal to promote candidates after a competition for posts in the (then) Supreme Administrative Prosecutor's Office. The Prosecutors' College explicitly decided not to appoint candidates who applied under the relevant legal mechanism.

For reference see: <https://vss.justice.bg/page/view/111864>.

Allocation of cases in courts

5000 character(s) maximum

Although Bulgaria operates a centralised random case allocation system with publicly retrievable protocols, and in 2025 the SJC published an audit report on its utilisation for specific case categories, there is the issue that even where protocols are technically public, the ease of access and interpretability for ordinary litigants and civil society remains limited.

Many litigants do not know where or how to retrieve allocation protocols, which can affect their ability to verify whether a judge was truly assigned at random. The fact that these protocols are often in PDF format or technical database forms without user-friendly interfaces is also a factor in this regard.

In addition, the absence of regular summarised transparency reports on allocation data (such as volumes per judge, judicial workload balances, audit findings) weakens practical assurances about unbiased allocation.

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 2025, a central trigger was the CJEU judgment of 30 April 2025 (joined cases C-313/23, C-316/23, C-332/23), which held that the principle of judicial independence is incompatible with a practice whereby a judicial-governance body with an expired mandate continues operating without an explicit legal basis and without a time limit.

After the National Assembly adopted in January 2025 the amendments to the Judicial System Law that barred an SJC with an expired mandate (since 2022) from electing a new Prosecutor General and the heads of the Supreme Court of Cassation and Supreme Administrative Court, and closed pending or open procedures for those elections, which means in essence formally shrinking the SJC's practical room to act in the most politically sensitive appointment votes. The knock-on effect followed quickly as the SJC Plenum terminated the ongoing procedure to elect a Prosecutor General, explicitly citing the just-entered-into-force amendments.

In parallel, the debate about "expired mandates" also hit the Inspectorate in April 2025 as the CJEU ruling highlighted the risk around the Inspectorate continuing to function with long-expired terms, reinforcing the pressure to resolve appointment deadlock.

In practice, however, this led to hesitation and partial suspension of integrity and oversight activities, including those involving intrusive measures such as access to bank secrecy.

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 2025 record shows active disciplinary tools, but mostly through individualised, high-visibility cases, while broader systemic accountability issues (including at senior prosecutorial level) remain unresolved. This asymmetry fuels concerns that disciplinary mechanisms may be used unevenly, rather than as part of a coherent integrity policy.

For instance, multiple 2025 Supreme Administrative Court judgments annulled disciplinary sanctions imposed on judges, investigators and prosecutors due to insufficient reasoning, procedural flaws or disproportionality (such as cases involving investigator Neli Todorova and judge Deyan Vutov). While judicial review functioning is a significant safeguard, the frequency of annulments potentially raises concerns about the quality, consistency and legal robustness of disciplinary decisions taken by the SJC.

Independence/autonomy of the prosecution service

5000 character(s) maximum

Significant developments over the past year included continued concerns regarding the independence and autonomy of the prosecution service. As outlined above, the prolonged and legally contested interim mandate of the Acting Prosecutor General, combined with unresolved questions surrounding the effectiveness of the mechanisms for his investigation and oversight, has implications for legal certainty and accountability at the highest level of the prosecution.

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

5000 character(s) maximum

In 2025, the independence of the legal profession in Bulgaria was brought into focus by legislative initiatives concerning the Law on the Bar. Draft amendments were registered in the National Assembly and subjected to public consultation, while the Supreme Bar Council simultaneously advanced its own proposals for reform of the regulatory framework governing lawyers.

Although these processes were presented as technical or harmonisation measures, they raised questions about the balance between state regulation and professional self-governance.

Following the parliamentary commission's work three separate draft were presented, two of them were approved and the third was rejected. This led to the merging of the two approved drafts and in the end of October 2025, the General Draft Law on Amendments and Supplements to the Bar Act was presented for a first hearing. The draft law, however, remained unadopted by the end of 2025.

For reference see: <https://www.strategy.bg/bg/public-consultations/10783>
<https://www.parliament.bg/bg/bills/ID/166682>
<https://www.sak-sas.bg/bg/a/protokol-8-ot-19032025-g>

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

5000 character(s) maximum

Several developments were capable of negatively affecting the general public's perception of judicial independence in Bulgaria. Among these was the continued operation of key judicial governance bodies, including the Supreme Judicial Council and its Inspectorate, with long expired mandates, combined with political deadlock preventing their renewal. This situation was further amplified by the CJEU's judgment of 30 April 2025, which questioned the compatibility with EU law of judicial oversight bodies exercising powers without clear temporal limits.

At the same time, legislative amendments curtailed the ability of an expired-mandate Council to appoint new judicial leadership, reinforcing the sense of institutional stagnation.

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)

[single market relevance] Accessibility of courts (e.g. court/legal fees, legal aid, language)

5000 character(s) maximum

The Ministry of Justice proposed amendments to the state-fee tariff (Tariff No. 1) in 2025 for certain procedures (citizenship-related), showing the direction of fee policy change.

The changes provide for a significant increase in fees for applications and other activities relating to Bulgarian citizenship.

For reference see: <https://bnrnews.bg/en/post/135939/fees-for-bulgarian-citizenship-are-set-to-increase-sharply>

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

The Supreme Judicial Council published multiple 2025 budget implementation reports, showing that a significant share of resources continues to be absorbed by salaries and remuneration, while long-standing issues remain regarding staffing shortages and infrastructure.

Civil society stakeholder and economic analysis pointed to concerns that investment in IT systems and court infrastructure may lag behind salary growth.

[single market relevance] Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

5000 character(s) maximum

SJC communications suggest training materials specifically aimed at practical use of justice IT modules (such as videos for self-learning on the “workload” module in the court IT system). However, if training focuses solely on IT compliance without parallel emphasis on procedural safeguards and digital rights, there is the risk of uneven practice emerging across courts.

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

The Bulgarian judiciary continued implementing e-justice through the Unified Portal for Electronic Justice, including electronic case files and online access to judicial acts.
In 2025, the SJC published a detailed report on the centralised electronic processing and allocation of order-for-payment cases, covering July to September 2025.

While digitalisation improves efficiency it still risks excluding individuals without digital skills or e-ID, unless alternative channels remain effective. Procedural inequality may arise if electronic communication becomes de facto mandatory without adequate safeguards.

For reference see: <https://news.lex.bg/%D1%81%D1%8A%D0%BE%D0%B1%D1%89%D0%B5%D0%BD%D0%B8%D1%8F-%D0%B8-%D0%B5%D0%BB%D0%B5%D0%BA%D1%82%D1%80%D0%BE%D0%BD%D0%B8%D0%B7%D0%B0%D1%86%D0%B8%D1%8F-%D0%BD%D0%B0-%D0%BF%D1%80%D0%BE%D0%B8%D0%B7%D0%B2/>

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

No relevant information to provide on this issue.

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

The centralised redistribution of order-for-payment cases derogated from strict local jurisdiction to address workload imbalances. However, debate among experts in the field continued in 2025 on institutional capacity to handle corruption and EU-funds fraud, particularly in connection with the EPPO framework.

Our general observation is that centralisation may reduce local accessibility for litigants. Somehow limited or

uneven specialisation risks delays and inconsistent adjudication in complex corruption cases for instance.

For reference see: https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/01/reforming-bulgaria-s-anti-corruption-authorities_79108af5/11ef33c9-en.pdf

[single market relevance] Specialisation (of judges/specific courts/chambers within courts) and training for the judiciary to deal with commercial cases, as well as alternative dispute resolution mechanisms and mediation as regards commercial cases.

5000 character(s) maximum

In June 2025, amendments to the Civil Procedure Code introduced mandatory mediation information sessions for certain disputes. Some major arbitration law reforms entered into force in August 2025, introducing registration and oversight mechanisms aimed at curbing abuse. However, possible over-regulation of arbitration could possibly undermine party autonomy if judicial review standards are unclear.

For reference see: <https://cms-lawnow.com/en/ealerts/2025/08/bulgaria-passes-reforms-to-curb-arbitration-fraud-and-strengthen-safeguards>

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 in the introduction)

[single market relevance] Developments related to efforts to improve the efficiency of the justice system (e.g. as regards length of proceedings, to address backlogs)

5000 character(s) maximum

Over the past year efficiency challenges in the Bulgarian justice system remained visible through official statistics published by both the SJC and the Prosecutor's Office. The prosecution's first-half 2025 summary shows persistent issues with the duration of pre-trial proceedings, particularly in complex criminal cases, despite stable case completion rates.

The figures suggest that structural bottlenecks in investigations continue to affect overall case length.

For reference see: https://vss.justice.bg/root/f/upload/46/Ob-info-I_shestmesechie-2025.pdf

Any other developments related to the justice system - please specify

5000 character(s) maximum

In late January 2026, the Constitutional Court of the Republic of Bulgaria formally initiated a constitutional case examining whether the six-month limit on interim mandates in Article 173(15) of the Judicial System Law is constitutional and whether it applies to the ongoing tenure of Borislav Sarafov beyond July 2025. This case was opened following a referral from the Appellate Court in Varna, which sought clarification on whether the contested provision should apply retroactively to Sarafov's appointment and culminated in Constitutional Court case No. 2/2026 being registered for review.

This development follows a sequence of events from the previous year, where the Supreme Court of Cassation's criminal chamber concluded that Sarafov's powers as acting Prosecutor General ceased on 21 July 2025, after the six-month cap introduced by the January 2025 amendments took effect.

This legal uncertainty over the prosecution leadership's legitimacy had a measurable impact on judicial decision-making throughout 2025, contributing to case suspensions in administrative proceedings concerning access to public prosecution information when judges awaited interpretative clarity.

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 2025 Report regarding the anti-corruption framework (if applicable):

5000 character(s) maximum

Follow-up in 2025 centred on restarting and structuring stalled reforms tied to the anti-corruption institutional set-up and EU good-governance expectations, particularly around the re-configured anti-corruption commission and its leadership selection process, while international monitoring continued to underline implementation gaps in integrity safeguards for top executive functions and law-enforcement.

The National Assembly adopted procedural rules in July 2025 for nominating members of the Counter-Corruption Commission via a five-member independent nomination committee (including proposals from the Supreme Court of Cassation, Supreme Bar Council, Ministry of Justice, Ombudsperson, and National Audit Office).

As long waited reforms remain delayed and politically contested, anti-corruption enforcement risks staying ineffective, which affects equality before the law and the right to an effective remedy, especially in cases linked to misuse of public resources and EU funds.

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/specialised 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

A major institutional development in 2025 was the formalisation of a renewed selection procedure for the Counter-Corruption Commission's leadership through a nomination committee model, while cooperation with EU anti-fraud actors remained practically relevant due to EPPO-led investigations into corruption affecting EU funds.

The National Assembly adopted rules in July 2025 setting up a five-member nomination committee for electing the Commission's members (with institutional nominations and decision-making rules). In parallel, EPPO in Sofia conducted searches in June 2025 in an investigation into suspected passive corruption and abuse of office affecting EU maritime and fisheries programmes, illustrating ongoing operational cooperation with national police.

In 2025 and early 2026 Bulgaria's efforts to establish a new independent Counter-Corruption Commission suffered repeated delays. Although the procedures for selecting a new commission were launched a year and a half late, holding up conditional EU funding under the Recovery and Resilience Plan, the process was still underway in mid-2025.

By January 2026, the National Assembly, driven by a proposal from the ruling party and supported by some other parliamentary groups, voted at first reading to abolish the current Counter-Corruption Commission, transferring its functions to the General Directorate for Combating Organized Crime and the Court of Audit, after rejecting alternative proposals by other political parties.

This move has had real consequences for EU funding and in November 2025, the European Commission froze 215 million EUR of Bulgaria's Recovery and Resilience Plan payments, citing the lack of an independent anti-corruption body among the reasons.

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

5000 character(s) maximum

The debate and monitoring focused on whether appointment procedures and institutional design provide sufficient safeguards against political influence, as well as whether integrity rules for top executive functions and law enforcement are effectively implemented in practice.

GRECO's 5th Round Compliance assessment reported limited implementation progress (with 7 out of 28 fully

implemented recommendations), signalling continuing weaknesses in integrity and anti-corruption safeguards at the level of central government and law enforcement. Domestically, public controversy around the anti-corruption commission selection framework was reported in the context of concerns about its independence and credibility.

For reference see: <https://rm.coe.int/greorc5-2024-14-final-eng-compliance-report-bulgaria-public/1680b3f2d1>

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 policy discussion remained strongly linked to strategic planning and conditionality under EU governance and recovery frameworks, with external assessments continuing to stress the need for stable institutional leadership, clear mandates, and measurable implementation.

The OECD's 2025 report on reforming Bulgaria's anti-corruption authorities emphasised that effectiveness depends on coherent institutional design, coordination, and credible implementation mechanisms (including planning and performance-tracking across institutions). Complementing this, civil society monitoring in 2025 continued to flag a gap between strategic frameworks and tangible results in high-level corruption case outcomes.

Furthermore, the OECD's 2025 report on Bulgaria's discusses the forfeiture system, explicitly noting that Bulgaria's framework did not allow the now separated Commission for the Confiscation of Illegally Acquired Property to proactively freeze assets on a reasonable suspicion basis and offering recommendations on clarifying responsibilities and improving inter-institutional coordination.

For reference see: https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/01/reforming-bulgaria-s-anti-corruption-authorities_79108af5/11ef33c9-en.pdf

B. Prevention

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

5000 character(s) maximum

In February 2025, the Council of Europe's GRECO 5th Round Compliance Report on Bulgaria reiterated that asset, income and interest declarations for high-level public officials were not yet subject to robust enforcement mechanisms and recommended clearer, enforced integrity checks and monitoring mechanisms for such declarations and conflict-of-interest control.

There weren't any significant developments domestically on this issue, however. While not legislative in itself, widespread public protests in late 2025 against government corruption and perceived lack of accountability of high-level officials underscore ongoing societal concern about integrity norms and enforcement. These critiques emphasised corruption and insufficient effective checks on politicians and high public officials.

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 significant transparency-related development not related to high-level officials, but to the CSOs instead, was the Ministry of Justice's public consultation process initiated in August 2025 on the need for a future regulation addressing the "representation of interests" (commonly referred to as lobbying), reflecting ongoing efforts to strengthen transparency of decision-making and influence.

Amnesty International Bulgaria submitted its contribution, highlighting the need to differentiate between lobbying, self-representation and advocacy work related to public interest. Although it is widely perceived that lobbying regulation can strengthen transparency, any future law if drafted broadly or without safeguards for public-interest advocacy can lead to a chilling effect in civil society participation and restrict freedoms of expression and of association, especially for watchdog actors exposing corruption.

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

The main 2025 evidence base available publicly from independent monitoring points to a continuing gap between formal rules and effective enforcement, especially for high-level corruption and conflict-of-interest cases.

Civil society reporting described a pattern in monitored high-level corruption cases where investigations are frequently terminated before reaching court and final convictions remain comparatively rare, with acquittals outnumbering convictions in the monitored set.

--> For the three previous points, **please also provide information and figures on their application/enforcement if available to you**, 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

In May 2025, Bulgaria adopted targeted substantive amendments to its Whistleblower Protection Law, strengthening the framework introduced in 2023 and addressing gaps identified in practice and external monitoring. The amendments were promulgated in State Gazette No. 38 of 9 May 2025 and entered into force immediately.

The key changes removed the time limit for reporting breaches, allowing whistleblowers to report violations regardless of when they occurred, and expanded the circle of protected persons to include interns, volunteers, trainees and job applicants who obtain information during recruitment or pre-contractual procedures. The amendments also tightened requirements for internal reporting channels, obliging each covered entity to

maintain its own independent channel and clarifying that report handling may be entrusted to external, independent persons to strengthen confidentiality and trust. In addition, the law introduced clearer sanctions for non-compliance by obligated entities, reinforcing enforcement.

Overall, the 2025 amendments aimed to bring domestic law closer to the practical expectations of EU Directive 2019/1937. It is yet to be assessed how the law is being implemented in practice. Also, at present no official comprehensive statistics are being published and available to the public.

[single market relevance] 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, investor residence schemes, large-scale investments of national interest and the spending of EU funds, urban planning.*
- *In particular, measures to mitigate high risks of corruption in the area of public procurement, such as enhancing transparency and oversight (for example through digital technologies) and promoting fair competition and accountability in public procurement (e.g. targeted actions to address the high share of single bids) and measures to guarantee the effective and independent functioning of the public procurement review bodies.*

5000 character(s) maximum

Procurement-related corruption risk remained a major 2025 concern, with EU-level documents continuing to track Bulgaria's high share of single-bid procedures and conditioning reforms on measurable reductions, while EPPO investigations highlighted procurement fraud vulnerabilities affecting EU funds.

An EU document setting milestones for Bulgaria measured the share of procurement procedures with a single bidder and set a reduction target, explicitly using 2025 contract data as the measurement baseline. Complementing this, EPPO's October 2025 searches in the Plovdiv "green space project" case illustrate suspected procurement fraud affecting EU-linked spending and the operational relevance of EU-level enforcement in high-risk sectors.

[single market relevance] Measures for the prevention of corruption in relation to the issuing of official permits (e.g. related to environment, energy, service provision and various types of construction)

5000 character(s) maximum

Permit-issuing remains a structurally corruption-prone area, and in 2025 public reporting continued to show that major permits and concessions (including in energy and large-scale investment contexts) require heightened

transparency, as these decisions combine discretion, high economic stakes and public interest. Reporting on major tender/permit processes (such as exploration agreements concluded following EU tender procedures) illustrates the importance of clear decision trails and public scrutiny around permits and concessions with high financial value.

C. Repression

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

5000 character(s) maximum

Bulgaria continued in 2025 to reference legislative work and alignment efforts concerning bribery and related offences in the context of international anti-corruption frameworks (UNCAC / OECD-related discussions), including broadening or clarifying bribery offence scope.

Bulgaria's statement in the UNCAC context (from December 2025) referred to legislative changes broadening bribery offence scope to cover misuse of official position regardless of benefit form, demonstrating an ongoing criminal-law adjustment narrative.

While strong criminalisation may be necessary, it is far from sufficient. If sanctions are not applied consistently, the deterrent effect is lost, undermining equal protection and effective remedies for those harmed by corruption and abuse of office.

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

2025 publicly available institutional statistics continued to show the scale and trends of corruption-related pre-trial proceedings, including declines in newly opened and monitored corruption investigations compared to prior years, and ongoing reliance on summary reporting rather than fully granular public datasets.

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

In 2025, recurring obstacles highlighted in monitoring and case-based reporting included the practical impact of parliamentary immunities, termination of cases in the pre-trial phase, and broader governance factors affecting high-level accountability.

For instance, civil society organisations reports explicitly reference situations where lifting parliamentary immunity was sought in connection with influence-peddling allegations, illustrating how immunity can delay or

block prosecution steps in high-level contexts. More generally, civil society monitoring points to a pattern of cases being closed before trial.

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

Throughout the year, civil society monitoring and reporting continued to raise doubts about sanctioning effectiveness for high-level corruption, emphasising acquittals and discontinuations, which weaken recovery and deterrence.

According to the Anti-Corruption Fund, for instance, in its tracked set of high-level cases, final acquittals outweighed convictions and many proceedings ended in the pre-trial phase, indicating low effectiveness of punitive and deterrent outcomes.

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

5000 character(s) maximum

A cross-cutting 2025 development with direct relevance to anti-corruption effectiveness is the sustained pressure environment for journalists and civil society reporting on corruption, which weakens societal oversight and can deter exposure of wrongdoing.

Amnesty International's May 2025 submission on Bulgaria notes that journalists covering corruption and organised crime face court action and risks that undermine independent reporting. This connects directly to anti-corruption accountability because investigative journalism and watchdog CSOs are among the primary sources of exposure for high-level corruption allegations.

III. Media pluralism and media freedom

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding media pluralism and media freedom (if applicable)

5000 character(s) maximum

In 2025, follow-up was mainly discussed in terms of aligning Bulgaria with EU-wide safeguards (notably around anti-SLAPP measures and broader media governance), while domestic debate continued around persistent structural vulnerabilities identified in EU assessments (media regulator governance, public service media leadership deadlock, limited enforcement of ownership transparency). Amnesty International's 2025 assessment underlined that independent journalists reporting on corruption and organised crime continued to face strategic litigation pressure, which directly affects the effectiveness of any "follow-up" agenda.

Our organisation publicly highlighted strategic lawsuits against independent media, citing cases involving Mediapool and investigative outlets.

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

In the course of the year both the operational independence and effective enforcement capacity of the Council for Electronic Media (CEM) were tested in practice in the context of its statutory mandate to run the procedure for selecting the Director General of Bulgarian National Television (BNT). Alongside the broader concerns noted in EU-level assessments about the resilience of media governance, there was a visible institutional confrontation around CEM's ability to carry out its powers without obstruction or intimidation.

In April, the Bulgarian regulator elected Simona Veleva as its chairwoman for a one-year term. Among the Council's competencies is to appoint and dismiss the directors general of the two public media outlets - BNT and BNR. Currently, BNT is still headed by Emil Koshlukov, whose three-year mandate expired back in 2022.

In September 2025, CEM published an official position stating it had received a letter from BNT's then acting Director General Emil Koshlukov regarding CEM's contested decision to launch a procedure for electing a new BNT Director General. The Council described the tone of the letter as "sharp, threatening and ultimative" and noted that it contained threats to refer CEM members to the police, prosecution, a private enforcement agent and the courts if demands were not met.

In November 2025, the Supreme Administrative Court (BAC) fully overturned a lower court decision that had halted the competition for a new BNT head, finding the suspension "unmotivated" and lacking legal basis and procedural clarity; this decision effectively restored CEM's ability to proceed with its legally mandated selection procedure.

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

The appointment model remained unchanged in 2025 (shared competences between Parliament and the President).

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

5000 character(s) maximum

As illustrated in the case above on the friction between CEM and BNT's leadership, professional and civil society actors continued to play a de facto self-regulatory and watchdog role by documenting threats to journalism, advocating for safeguards against abusive litigation, and defending access to information. Amnesty's 2025 analysis places particular emphasis on how legal pressure on journalists affects the broader rights environment.

The joint MFRR mission in September 2025 convened with local stakeholders including journalists, editors and

civil society, culminating in a report that addressed legal threats, SLAPPs, media pluralism challenges, and access to information issues. The mission's recommendations reinforced the need for professional councils and associations to play an ongoing role in safeguarding standards and supporting media workers.

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

[single market relevance] Measures taken to ensure the fair and transparent allocation of state advertising

5000 character(s) maximum

MFRR monitoring contextualised state advertising as one of the economic pressure points that can be used to influence editorial outcomes. The 2025 MFRR report emphasised that non-transparent state advertising and financial dependencies at local and regional levels contribute to soft censorship and constrain pluralistic reporting. The 2025 mission's findings linked such practices to weaker editorial independence, particularly in smaller outlets that rely disproportionately on public advertising.

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
- **[single market relevance]** 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

Broader safeguards against political interference remained fragile, particularly in relation to public service media governance and appointment procedures. Amnesty International continued to highlight that structural weaknesses allow indirect political pressure on editorial independence, especially in publicly funded media.

[single market relevance] Transparency of media ownership and public availability of media ownership information, including on direct, indirect and beneficial owners

5000 character(s) maximum

Bulgaria continued to have multiple registers, but a central concrete finding in EU and independent monitoring was that enforcement of ownership disclosure obligations remained limited, leaving the public with incomplete visibility on control and influence.

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

MFRR and allied press freedom monitoring in 2025 identified political polarisation and structural interference risks as core impediments to media freedom, underscoring that achieving and maintaining functional safeguards against interference remains an ongoing challenge.

Amnesty International and MFRR both documented that journalists, particularly those investigating corruption, continued to face legal pressure and intimidation in 2025, with limited effective safeguards. The conviction of journalist Boris Mitov in a defamation case widely characterised as a SLAPP was highlighted by Amnesty, MFRR partners and international media freedom organisations, and recorded on the Council of Europe Platform.

The MFRR report from late 2025 noted that non-transparency in ownership, pressures from local authorities' advertising budgets, and hesitancy to implement EMFA provisions have combined to weaken independent journalism environments. These structural observations were corroborated by media groups and coverage of press freedom debates throughout 2025.

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

In 2025, access to information remained a contested area, with both Amnesty International and MFRR pointing to systemic opacity, while courts continued to play a corrective role.

Bulgarian courts ruled in favour of journalists' access to prosecution-related information in July 2025, while the ECtHR judgment in *Girginova v. Bulgaria* reaffirmed that restricting access to judicial reasoning violates Article 10 ECHR.

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

In 2025 Bulgaria continued to face serious challenges from strategic lawsuits against public participation (SLAPPs) and defamation cases targeting journalists and media outlets, often linked to reporting on corruption, judicial integrity and public officials. Multi-stakeholder monitoring, including the MFRR and Council of Europe's Safety of Journalists Platform, highlighted dozens of active legal threats and the structural risks these pose to media freedom and pluralism.

While legislative reform was underway in principle, concrete safeguards against SLAPPs were still in development in 2025, as the Ministry of Justice prepared transposition of the EU Anti-SLAPP Directive and civil society continued to push for stronger protections. The legislative environment remained mixed as the National Assembly amended criminal law in July 2025 to lower minimum fines for insult/defamation and opened avenues to replace criminal liability with administrative sanctions. However, criminal defamation was not fully decriminalised, leaving significant space for abusive litigation to continue.

Several high-profile SLAPP-type cases in 2025 illustrated the landscape. On 16 July 2025, investigative journalist Boris Mitov and independent outlet Mediapool were ordered to pay over 20 000 EUR in a defamation case brought by a judge after critical reporting on the judge's career and assets; Reporters Without Borders condemned the ruling as a clear SLAPP aimed at silencing public-interest journalism and noted its potential chilling effect on peers. Meanwhile, Bird.bg documented at least 20 SLAPPs against its journalists by politicians, business people, and their associates over the course of 2025, with total claims approaching 250 000 EUR creating substantial financial and psychological pressure on the outlet's staff. Domestic journalism organisations highlighted that these suits are used to burden reporters with costs and distract them from critical reporting. AEJ-Bulgaria also reported on a long-running SLAPP case involving publications about a former judge, with the Supreme Court of Cassation increasing damages and civil society urging swift transposition of anti-SLAPP protections.

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

5000 character(s) maximum

According to the 2025 Reporters Without Borders World Press Freedom Index, Bulgaria fell from 59th to 70th place, one of the largest declines in the EU. The index highlighted ongoing attacks, threats, and SLAPPs against journalists as part of the reason for the drop, noting political interference and ownership pressure on editorial independence.

After the nationwide protests, in late December 2025, multiple Bulgarian media outlets joined a public solidarity campaign in support of journalist Maria Tsantsarova after she was pulled from the air following critical political interviews, a move that triggered protests organised by the AEJ, Bulgaria and broad commentary on editorial autonomy.

Reporting and analysis from MFRR/Council of Europe missions repeatedly noted that media pluralism remains constrained not only by legal pressure but also by economic and ownership structures that limit independent reporting; this includes concerns about soft censorship, economic pressures on outlets, and the political distribution of advertising and funds, which can incentivise self-censorship.

IV. Other institutional issues related to checks and balances

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the system of checks and balances (if applicable)

5000 character(s) maximum

In 2025, follow-up relevant to checks-and-balances was mixed: while some initiatives were framed as “strengthening statehood” or “transparency”, several high-profile steps were criticised by civil society and international observers as politicising oversight and narrowing civic space, notably through recurring attempts to introduce a “foreign agents” regime and by creating parliamentary ad-hoc bodies targeting specific civil society “networks”.

A draft law on foreign agents has been introduced for the fifth time, with the difference that this time the draft legislation reached the plenary, where it was narrowly rejected in February 2025, after sustained criticism from CSOs and international actors. Amnesty International Bulgaria was among dozens of organisations, which issued a formal position warning about incompatibility with rights standards. Later in November 2025, the National Assembly established a temporary commission on George and Alexander Soros and their foundations (often publicly framed as an “anti-Soros commission”), seen by many observers as part of escalating hostile rhetoric against CSOs.

A. The process for preparing, enacting and implementing laws

[single market relevance] Framework, policy and use of impact assessments and evidence based policy-making, stakeholders*/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 in the preparatory, the parliamentary and implementation phase (including guidance on how to implement legislation)

** This includes also the consultation of social partners*

5000 character(s) maximum

Observers repeatedly criticised weaknesses in legislative quality control, including limited ex-ante impact assessment and compressed consultation windows, especially for politically salient bills.

The recurring “foreign agents” draft law, although rejected in February 2025, was criticised for its broad scope and rights-restrictive effects, prompting formal human-rights and rule-of-law critiques (including by Amnesty International Bulgaria and ODIHR). In October 2025, media reported concerns that governing parties were advancing legislation with serious implications for rights and media freedom (including proposals criticised as enabling surveillance pressure and criminal liability risks for journalists), which was presented publicly as being

pushed forward despite strong objections.

For reference: <https://www.parliament.bg/bg/bills/ID/165804>

[single market relevance] 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

Stakeholders described a persistent practice of attempting to move politically sensitive measures quickly, with limited deliberation, especially during periods of political instability and heightened polarisation.

The end-2025 budget crisis illustrated governance under pressure with the sitting government withdrawing and rewriting its draft budget after mass protests across the country and external warnings, while political actors argued over “extraordinary” procedures to push fiscal decisions forward. Separately, major electoral-rule debates re-emerged late in 2025 (drafts tabled in December 2025), with public commentary warning against last-minute changes before elections (even if some decisive votes occurred in early 2026).

For reference: <https://www.parliament.bg/bg/bills/ID/166781>

[single market relevance] Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

5000 character(s) maximum

Legal certainty concerns were raised particularly where proposed rules would single out categories of actors (e.g., “foreign-funded” persons/organisations) for special registration obligations or activity constraints.

The “foreign agents” draft, which was rejected in February 2025, was criticised as modeled on restrictive approaches and as creating stigmatising status effects, with ODIHR noting the risk of reintroduction in similar form. The creation of a parliamentary commission focused on “Soros” networks also reinforced perceptions of selective political targeting rather than neutral standards.

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

5000 character(s) maximum

No major new “state of emergency” regime was central in 2025, but governance stressors showed how extraordinary political conditions (budget shocks, caretaker dynamics, polarisation) can still compress oversight and accountability.

The winter budget protests and subsequent government withdrawal of the draft budget demonstrated how rapidly shifting executive decisions can occur amid intense public pressure, with concerns also raised about compliance with EU fiscal constraints and transparency.

Regime for constitutional review of laws

5000 character(s) maximum

Constitutional review remained a key backstop, but public debate in 2025 frequently focused on whether institutions could effectively check potentially rights-restrictive legislative initiatives before harm occurs.

B. Independent authorities

Independence, resources, capacity and powers (including effective access to relevant data) 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

The National Assembly elected a new Ombudsperson after the post had been vacant since April 2024, which restored institutional leadership but did not resolve structural independence concerns linked to the constitutional "house book" rule that lists the Ombudsman (and deputy) among potential caretaker prime ministers. In a subsequent 2025 interview, the newly appointed Ombudsperson stated she did not see herself as caretaker PM and would not accept such a role—showing the independence tension created by the "house book" design. This concern was also explicitly echoed at international level: the GANHRI Sub-Committee on Accreditation in October 2025 recommended removing the provision allowing the Ombudsperson and Deputy Ombudsperson to be appointed caretaker prime minister, linking it to Paris Principles independence safeguards for NHRIs.

In parallel, the National Assembly renewed the leadership of the Commission for Protection against Discrimination (CPD) in May 2025, affecting the equality body's composition and governance at a time when international and civil society reporting continued to flag persistent discrimination and hate speech concerns in Bulgaria.

For reference: <https://www.ohchr.org/sites/default/files/documents/countries/nhri/ganhri/sca-report-46th-session-en.pdf>

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

5000 character(s) maximum

The Council of Europe's ECRI process in 2025 focused discussion on implementation of priority recommendations, including combating racist and anti-LGBTI hate speech and hate-motivated violence, areas where the Commission for Protection against Discrimination has a formal role but where independent reporting continues to highlight persistent gaps in practice.

[single market relevance] Safeguards to ensure the effective independence of supervisory and regulatory authorities with a direct impact on economic operators such as national economic oversight, enforcement and competition authorities

The National Assembly adopted amendments expanding the powers of the Competition Protection Commission (CPC) in October 2025. Media coverage noted opposition warnings that the body could become a “powerful cudgel,” underscoring concerns about safeguards and accountability of enforcement powers.

C. Accessibility and judicial review of administrative decisions

[single market relevance] Transparency of administrative decisions and sanctions (incl. their publication and rules on collection of related data) and respect of the good administration principle (including the obligation of the administration to give reasons for decisions)

5000 character(s) maximum

Amendments to the Administrative Procedure Code were promulgated in State Gazette in August 2025. Stakeholder analysis noted the changes were assembled from different initiatives and advanced in a way described as “quietly voted,” triggering criticism from access-to-information advocates about process and implications for administrative justice safeguards.

[single market relevance] 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

[single market relevance] Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)

5000 character(s) maximum

[single market relevance] 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

[single market relevance] 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

European Civic Forum's 2025 civic space reporting referenced persistent implementation gaps on ECtHR-related issues, framing them as long-running structural deficiencies rather than resolved matters.

Oversight, including by courts, of the use of intrusive surveillance software by national authorities

5000 character(s) maximum

2025 regional monitoring increased attention to democratic risks from intrusive surveillance, while Bulgaria remained in a wider European debate about spyware safeguards and oversight.

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

In 2025, the Ministry of Justice launched a public consultation on a draft Law to supplement the Non-Profit Legal Entities Law (ЗЮЛНЦ) aimed at “closing” the long-running re-registration process and regulating the consequences for CSOs that did not re-register in time. The draft proposes that non-re-registered entities will be treated as having terminated activity “ex lege” after a new deadline, and it introduces a structured route toward liquidation and eventual deletion.

The purpose and the draft's core mechanism include a new deadline to re-register by 31 Dec 2026, with non-re-registered CSOs deemed “terminated activity” from 1 Jan 2027, automatically marked in BULSTAT. The same package details that after 1 Jan 2027, liquidation can be initiated by a defined circle (e.g., founder, member of management body, foundation heir, creditors, and persons in pending proceedings) and sets an order for appointing a liquidator, including where the legal representative cannot act (then: members of the management body / the initiator).

In October and November 2025, there were a series of parliamentary commission discussions on the amendments to the Law on the Commercial Register and the Register of Legal Entities with Non-Profit Purpose, introducing a register of persons deprived of managerial rights. Registration of CSO board members or managers is to be refused if a person appears in this register, directly affecting who may participate in CSO governance.

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

In 2025, the environment for CSOs was again marked by hostile political rhetoric and institutional actions portraying civil society as a vehicle for “foreign influence”, contributing to a climate of stigmatisation.

The National Assembly rejected a proposed “foreign agents” registration law in February 2025, following strong criticism from CSOs and international actors such as the ODIHR. Later, in November 2025, the National Assembly established a temporary commission to investigate alleged “Soros-linked” influence, explicitly targeting CSOs, media, judges and academics. Bulgarian and international CSOs described the commission as stigmatising and intimidating. The commission was closed before it could actually function, but the precedent on its creation remains.

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

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

Bulgaria did not adopt a comprehensive, government-led strategy to promote a rule of law culture through education or sustained public awareness. Instead, rule of law debates were largely driven by civil society, independent media and public mobilisation, often in reaction to perceived institutional failures.

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

5000 character(s) maximum

Recurrent institutional crises (caretaker governments, contested appointments, budget withdrawal after protests) reinforced a perception that key decisions are driven by political confrontation rather than stable, transparent rule-of-law procedures. Media coverage and public debate increasingly framed rule of law issues as partisan conflicts rather than shared constitutional values.

Cross-pillar elements: cross-border rule of law issues related to the Single Market

If there are any significant challenges concerning the Single Market you have been facing in a cross-border context relating to any of the four pillars of the report, including for example issues with market access and the conditions for economic activities, that you would like to highlight, please do so here.

Given the cross-cutting nature of this question, it is included as a separate section in the questionnaire. Information collected under this question will however be integrated under the relevant existing pillar(s) of the Report.

5000 character(s) maximum

Supporting document upload

If you would like to submit any supporting document(s) to your contribution, please upload your file(s) here

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Contact

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