

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

Center for the Study of Democracy

Main Areas of Work

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

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

500 character(s) maximum

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

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Surname

Boycheva

Email Address of the organisation

liliana.boycheva@csd.eu

* Publication of your contribution and privacy settings

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

- ☐ Anonymous - Only your type of respondent, country of origin and contribution will be published. Organisation name, URL, transparency register number, first name and surname given above will not be published. **To maintain anonymity, please refrain from mentioning the name of your organisation and any details from which your organisation can be identified in the rest of your contribution 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

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

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

The procedure for the selection of a new Bulgarian European Prosecutor was launched in November 2025. The selection process consists of two stages: an admissibility check and a public hearing. Seven candidates submitted applications, three of whom are current European Delegated Prosecutors, and all were found admissible. The public hearing, attended by six of the seven candidates, took place on 14 January 2026. On 15 January 2026, the three nominees were announced. Their candidatures are subject to approval by the Council of Ministers, after which they will be submitted to the Selection Panel for review, and ultimately one of them will be appointed by the Council of the European Union.

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

5000 character(s) maximum

Promotion of judges and prosecutors (incl. judicial review)

5000 character(s) maximum

Allocation of cases in courts

5000 character(s) maximum

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

5000 character(s) maximum

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

A complaint against the acting Prosecutor General Mr. Borislav Sarafov, filed by a civic activist, argued that after 21 July 2025 he no longer had the legal authority to head the Prosecutor's office (see further p. 9), and that by continuing to perform the functions of Prosecutor General he was unlawfully usurping public authority – an offence classified under Article 274(1) of the Criminal Code.

On 6 October 2025, the ad hoc prosecutor responsible for investigating the Prosecutor General and his or her deputies, refused to open criminal proceedings based on this complaint. That refusal was upheld by the Sofia City Court on 29 October 2025. On 3 December 2025, a panel of the Appellate Court - Sofia confirmed the decision of the Sofia City Court, albeit with divergences in reasoning. The majority of the appellate panel held that the alleged conduct was objectively not criminal. By contrast, the reporting judge, took the view that Mr. Sarafov's continued occupancy of the post was indeed a criminal offence (Order No. 1160 of 3 December 2025 in appellate private criminal case No. 20251000601412/2025 before the Sofia Court of Appeal). While the refusal to open criminal proceedings was ultimately upheld by the Sofia City Court and the Appellate Court–Sofia, the existence of a reasoned dissent at appellate level confirms that the legal assessment of the acting Prosecutor General's continued exercise of office is far from settled.

A new ad hoc prosecutor was appointed under the special mechanism for the investigation of the Prosecutor General, following the expiry of the two-year mandate of the first ad hoc prosecutor. Pursuant to Article 173a (3) of the Judicial System Act, where proceedings against the Prosecutor General or one of his or her deputies last for more than two years, another judge is designated and appointed by the Prosecutorial College as a prosecutor at the Supreme Cassation Prosecutor's Office. According to information provided by the former ad hoc prosecutor, Ms Daniela Taleva, as of 3 December there remained one pending file.

After it became known that a new ad hoc prosecutor was to be appointed, the Acting Prosecutor General formally requested, by letter, to be present during the election process. According to online media outlet Sega, the letter also sought the recusal of all representatives of the Union of Judges in Bulgaria who had expressed their consent to be eligible for appointment as the special prosecutor responsible for investigating alleged prosecutorial bias and manifest prejudice against the Acting Prosecutor General by certain leaders of the organization. The request was justified on the basis of potential conflicts of interest. The judges were ultimately not recused. However, the Acting Prosecutor General's attempt to influence the appointment process through requests for participation and recusals—although ultimately unsuccessful—further raises concerns regarding safeguards for independence and impartiality.

On 12 December 2025, the new ad hoc prosecutor, Mr. Anton Urumov, was selected by random allocation from among 11 judges (2 years ago they were 22) who had given their consent to perform the functions of prosecutor responsible for investigating offences committed by the Prosecutor General or his or her deputies, and he was formally appointed on 22 December 2025. Mr Urumov is a long-standing criminal judge. He previously served at the Sofia District Court and subsequently at the Sofia City Court. Six years ago, following a competitive transfer procedure, he was appointed to the Specialised Criminal Court, and after its dissolution, he returned to the Sofia City Court.

The procedural issues with the mechanism for the investigation of the Prosecutor General and his or her deputies, pointed out in the 2025 Report, remain to be addressed.

Independence/autonomy of the prosecution service

5000 character(s) maximum

Regarding the judicial review for prosecutorial decisions for cases of termination and suspension of investigations for victimless crimes, previously discussed in the 2025 RoL report, since December 2025, with amendments to the Criminal Procedure Code (CPC), several state bodies (the Anti-Corruption Commission, the Commission for the Confiscation of Illegally Acquired Assets, the State Financial Inspection Agency and the National Audit Office) now have the authority to challenge decisions suspending or terminating investigations to offences for victimless crimes (art. 243 (4) and (7); art. 244 (3) and (5) CPC).

While the reform limits the prosecution's exclusive discretion in victimless crime cases, it strengthens accountability by introducing additional checks over decisions of high public interest. If applied in a manner

focused on legality rather than institutional influence, the mechanism has the potential to enhance public trust without undermining prosecutorial independence.

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

5000 character(s) maximum

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

5000 character(s) maximum

Since July 2025, the prolonged acting mandate of the Prosecutor General has raised concerns about legal clarity and judicial independence. Under amendments to the Judicial System Act (JSA), a six-month limit was introduced for holding office in an acting capacity for key judicial leaders, including the Prosecutor General. In practice, no new elections for the Supreme Judicial Council (SJC) took place, and the Acting Prosecutor General remained in office beyond this limit. The Prosecutorial College of the SJC ruled that the provision did not apply retroactively, a decision that sparked public and professional criticism.

This uncertainty has produced inconsistent case-law. While some courts accepted requests to reopen criminal proceedings that only the Prosecutor General may lodge, others, including the Supreme Court of Cassation, rejected them, citing the expiry of the mandate. The Constitutional Court did not address the Acting Prosecutor General's opinion in a key case (No. 12/2025), citing timing rather than legality, leaving further ambiguity.

In January 2026, both the Varna Court of Appeal and the Bulgarian Judges Association sought clarification on the application of the six-month limit and its impact on judicial practice. The lack of clarity regarding the Prosecutor General's and SJC's mandate continues to undermine public trust in the judicial system and casts reputational challenges on both the legislative and judicial branches.

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

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.)

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

5000 character(s) maximum

Capacity building trainings and their prioritisation, including with the participation of civil society organisations, continue. In November and December 2025, the Center for the Study of Democracy, in cooperation with the Commission for Personal Data Protection, conducted 6 in-person trainings in Sofia, Plovdiv, and Blagoevgrad, as well as 4 online webinars on the topic "Whistleblower Protection." Nearly 150 participants took part in the trainings, representing the public and private sector, civil society organizations, media/journalists. They discussed the current EU legal framework and its transposition in Bulgarian legislation, practical implementation and case law, reporting channels, as well as the rights and protection measures for whistleblowers. The public sector trainees included lawyers, judicial representatives, administrative staff, and clerks who were responsible for their organisation's internal reporting channels.

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

As of early December 2025, the Register of Arbitrations became operational. The Register contains information on permanent arbitration institutions carrying out arbitration activities with their seat in the Republic of Bulgaria, as well as on arbitration proceedings with the place of arbitration in the territory of the Republic of Bulgaria, initiated either before an ad hoc arbitral tribunal established to resolve a specific dispute or before a permanent arbitration institution seated outside the Republic of Bulgaria.

The Arbitration Register is maintained and administered by the Ministry of Justice. The Register is public in the part containing data on arbitration institutions, as well as the names and professions of the arbitrators affiliated with them. The remaining data and documents in the Register are accessible only to the Minister of Justice and the persons entrusted by him or her with maintaining the Register, to the Inspectorate to the Minister of Justice under the Judicial System Act, and to the courts.

Following a proposal by the Ministry of Justice, the National Assembly adopted amendments to the Administrative Procedure Code in August 2025. These reforms, set to take full effect on 1 July 2026, represent a shift toward a digital-first judicial environment. The primary objective of these legislative changes is to eliminate the chronic delays that have long plagued administrative proceedings. By enshrining electronic communication as a procedural standard, the reform seeks to shorten the duration between the filing of a case and the final ruling through several technical and procedural updates. The digitalisation of administrative court proceedings and the modernisation of judicial information systems are key components of the Recovery and Resilience Plan. These upgrades, aimed at enhancing citizen and corporate access to e-justice, serve as a mandatory condition for the disbursement of EU funds.

The core of the transition involves moving to default electronic case files, which ensures real-time access and maintains the integrity of court materials. Mandatory e-notification is now required for legal professionals, commercial entities, and state institutions, effectively reducing the administrative burden and lag time associated with traditional mail. To further streamline the process, video conferencing for appellate hearings has been granted the same legal status as physical presence. This move is particularly positive as it facilitates easier access for parties located far from judicial centres and lowers the overhead costs for both the state and

the litigants. The citizen-centred focus of these changes is commendable because it lowers the barrier to entry for individuals seeking to challenge administrative actions, thereby strengthening the rule of law.

However, despite the clear benefits, several concerns remain that require careful monitoring. The reliance on a digital-first approach risks creating a digital divide. While businesses and lawyers are generally equipped for this shift, vulnerable populations with low digital literacy or limited internet access must not be. Moreover, the success of this reform is entirely dependent on the robustness of the technical infrastructure. Any systemic failure in the Unified E-Justice Portal could lead to missed procedural deadlines, which potentially can violate the access to justice. To mitigate these risks, the government must ensure that the transition period is used effectively to build a resilient and user-friendly system.

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

5000 character(s) maximum

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

5000 character(s) maximum

[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

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

Any other developments related to the justice system - please specify

5000 character(s) maximum

II. Anti-Corruption Framework

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

Please provide information on measures taken to follow-up on the recommendations received in the 2025 Report regarding the anti-corruption framework (if applicable):

5000 character(s) maximum

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

List any **changes** as regards relevant authorities (e.g. national agencies, bodies) in charge of prevention, detection, investigation and prosecution of corruption and the resources allocated to each of these authorities (the human, financial, legal, and technical/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

The institutional landscape for fighting corruption in Bulgaria remains in a state of precarious transition as of early 2026. While the legislative framework was technically overhauled with the 2023 Anti-Corruption Act and subsequent 2025 amendments, the Commission for Countering Corruption (Anti-Corruption Commission) continued to operate under a leadership vacuum and lack of clear policy guidance.

Although the National Assembly established a specialised nomination committee in July 2025 to select a permanent three-member collegiate leadership, political volatility and the resignation of the government in late 2025 have stalled these appointments indefinitely. This prolonged interim status undermines the commission's institutional independence and hampers its ability to implement long-term strategic reforms. Without formally appointed directors, the body faces significant risks regarding internal accountability and public credibility.

Meanwhile, on 16 January 2026, members of the Parliamentary Legal Committee voted in favour of closing down the Anti-Corruption Commission by approving a draft law proposed that the Parliament voted at its first reading. on 21 January 2026. The draft law repeals the current Anti-Corruption Act in its entirety and provides for the Commission's employees to be reassigned to the General Directorate for Combating Organised Crime (GDBOP) and the National Audit Office. The debates continue, yet the potential closure of the Anti-Corruption Commission would complete the full reversal of almost all anti-corruption institutional innovations since Bulgaria'

s entry into the EU, mandated under the Cooperation and Verification Mechanism. This requires careful stock-taking and re-thinking of further reform efforts to ensure some minimal form of institutional stability, which is very much needed for operational efficiency, in particular at the backdrop of continuing legitimacy issues within the prosecution service and the judiciary. Due to the country's failure to meet its commitments regarding reforms of the Anti-Corruption Commission, the European Commission already withheld EUR 215 million from Bulgaria's second payment under the Recovery and Resilience Facility in November 2025.

Cooperation with European bodies like the European Anti-Fraud Office (OLAF) and the European Public Prosecutor's Office (EPPO), while tense and uneven, has delivered some results. In late 2025, joint efforts led to high-profile indictments, such as the case involving fraud in the reconstruction of the Varna fishing port, which was initiated by an OLAF report and investigated by the EPPO in coordination with the Bulgarian National Police.

Such, though arguably very limited successes demonstrate that the technical channels for cooperation at least in the executive power and as they relate to the EU-level remain functional. However, the European Commission's decision in November 2025 to suspend all recovery and resilience funds related to (unfulfilled) anti-corruption milestones indicates that the overall domestic legal and institutional anti-corruption framework remains incapable of delivering on very high public expectations and is not verified as independent at a systemic level. Establishing a robust track record of sound high-level convictions remains elusive, as public trust remains low and political initiatives for continuing reform towards better enforcement remain vague on detail and credibility. Until such reforms are widely agreed domestically and spelled out in socially accepted, cohesive institutional steps, based on the available best European and international practice, the institutional framework will likely remain widely unable to deliver sustained deterrence to corruption.

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

5000 character(s) maximum

The anti-corruption landscape in Bulgaria as of early 2026 remains deeply concerning, marked by a profound lack of public trust. According to Special Eurobarometer 561 (2025), 85% of the population perceives corruption as a pervasive systemic issue, a figure significantly above the EU average. This widespread perception has translated into renewed public mobilization, culminating in mass protests at the end of 2025. The protests precipitated the resignation of the government on 11 December 2025.

The legislative environment in the Bulgarian Parliament has been characterized by a fragile parliamentary majority, dependent on informal support from political actors whose leaders remain subject to US and UK anti-corruption sanctions. This inherent conflict of interest raises significant concerns about the integrity of the legislative process, specifically such related to anti-corruption legislation.

While now largely irrelevant, as the Bulgarian parliament seems to move to shut down the Anti-Corruption Commission the amendment of the election procedure for Commission members in July 2025, lowering the threshold from a qualified two-thirds majority to a simple parliamentary majority, indicated how anti-corruption reforms are gradually watered down. This change followed a 2024 Constitutional Court decision, which concluded that requiring a qualified majority for appointments to ordinary statutory bodies was not constitutionally mandated and unlawfully restricted the mandate of elected representatives. While legally grounded, this amendment effectively reduced the necessity for cross-party consensus, increasing the risk of political capture and undermining the Commission's independence. Rather than functioning as an autonomous oversight body, the Commission risks becoming a tool for repression, mirroring similar development paths of other anti-corruption institutions in the past.

At the same time, the inability to hold high-level officials accountable, in a professional human-rights-compliance processes, as reflected in continuing cases of selective prosecutions, dropped charges, flagrant human rights and procedural abuses of defendants -demonstrates a persistent structural failure in the justice system and investigative capacities.

These developments underscore fundamental deficiencies in the protection of witnesses, the management

of evidence, and the insulation of investigative processes from political interference. Addressing these challenges requires sustained, comprehensive reform measures that go beyond legislative adjustments, aiming to reinforce the operational independence, transparency, and effectiveness of anti-corruption institutions.

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

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

Bulgaria continues to face structural challenges in ensuring integrity for high-level officials. While procedural improvements were made, including parliamentary hearings for the Anti-Corruption Commission under the revised appointment framework, the Commission's new composition did not become operational, leaving its institutional effectiveness untested. Proposals to restructure the Commission—transferring preventive functions to the National Audit Office and investigative powers to a specialised directorate within the Ministry of Interior—reflect persistent doubts about its independence and ability to address corruption at the highest levels.

The broader integrity framework remains incomplete. Existing provisions largely address conflicts of interest during active service but provide limited oversight of post-employment conduct. The current one-year cooling-off period is narrow in scope, permitting former officials to enter lucrative private-sector roles or engage in informal advisory work, undermining public trust and facilitating the exploitation of insider knowledge. To strengthen integrity, Bulgaria needs a comprehensive and enforceable framework that extends post-employment restrictions, covers shadow lobbying, and ensures the functional independence and operational capacity of anti-corruption institutions. Without these reforms, high-level oversight risks remaining formal rather than substantive.

As part of efforts to strengthen integrity in the public sector, in December 2025, Bulgaria signed the Fighting Corruption and Promoting Integrity Programme. Implemented by the Ministry of Justice with financial support from the Swiss – Bulgaria Cooperation Programme the support measure is expected to reinforce high-level integrity standards, complementing statutory provisions and oversight mechanisms, and providing structured support to prevent conflicts of interest and improve accountability in public office.

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

While formal requirements for asset and interest disclosure are well established, their enforcement remains largely inadequate, functioning more as a bureaucratic exercise than as a tool for genuine oversight. The

absence of a methodology or practice for conducting lifestyle audits is a continuing deficiency. Without the ability to reconcile an official's visible wealth with their declared income, the disclosure system cannot effectively identify or deter illicit enrichment. A possible reform in this area must include the immediate development of a lifestyle audit framework that utilizes automated data from tax and property registries to trigger investigations into unexplained wealth.

Lobbying regulation has been in the legislative debate since 2023, driven largely by commitments under the Recovery and Resilience Plan and OECD accession goals. The Ministry of Justice has led the drafting of the Law on Transparency and Integrity in Governance, but the process has faced hurdles, and no draft law has been submitted to the Parliament. One of the most contentious issues has been the lack of a clear distinction between lobbying and civil society advocacy. There is a legitimate fear that vague definitions could result in the stigmatization of non-governmental organizations, subjecting them to excessive administrative burdens that might silence civic participation, like it has happened in the implementation of so many anti-corruption reforms. It is positive that the term "interest representation" has been later proposed as a more neutral and inclusive alternative to "lobbying". However, a standalone law may not be the most effective path. Many civil society experts argue for amending existing anti-corruption legislation instead, combined with a framework for voluntary self-regulation. A vital reform needed for genuine accountability is the introduction of a "legislative footprint" and mandatory calendars for senior officials, as the ones introduced in the European Commission, for example.

The landscape of political party financing in 2025 has also revealed recurring vulnerabilities, which are exacerbated by frequent changes to the electoral legislation. Although the National Audit Office continues to publish annual reports and donor lists, the surge in private funding during the October 2024 elections, and the continuous resurfacing of allegations of illicit cash payments (black registers) to political parties, is concerning. Monetary donations from individuals tripled compared to previous cycles, highlighting a shift toward private capital as a primary engine for political campaigns, especially within coalitions. While political parties remain heavily dependent on state subsidies, coalitions rely on private donations and candidate contributions for the bulk of their income. This disparity creates an environment where large private donors can exert disproportionate influence over political agendas. Strengthening the National Audit Office's capacity to conduct real-time audits could be a first step to address these issues.

The implementation of the National Strategy for the Prevention and Countering of Corruption remains patchy at best. The National Council for Anti-Corruption Policies, which is tasked with coordinating the work on the strategy within the executive, has notably failed to convene, marking a streak of several years without regular meetings. This lack of coordination means that the related Roadmap is being pursued in a fragmented and unsystematic manner, leaving priorities unaddressed. The blockage of the work of the Anti-Corruption Commission, and its proposed closure adds to the dysfunctionality. Furthermore, the persistence of expired mandates in critical bodies such as the Supreme Judicial Council and its Inspectorate undermines the stability of the entire integrity framework. The frequent use of the Constitutional Court to review election results further underscores the fragility of current institutional safeguards.

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

Declarations of assets and potential incompatibilities are intended to ensure transparency, but in practice they often operate as formalities. Without systematic verification or follow-up enforcement, officials can underreport or misvalue assets, correct omissions without penalty, and face minimal consequences. Enforcement data highlights the gap between formal rules and practical accountability: only a small fraction of hundreds of proceedings in 2024–2025 led to confirmed breaches, and prosecutorial and investigative limitations, including challenges in tracing foreign assets, further weaken the system. Similar risks are visible in state-owned enterprises and oversight appointments, where associates of high-level officials occupy influential roles and the

absence of recusal or cooling-off periods fuels perceptions of cronyism. To strengthen integrity, the system requires a shift from procedural compliance to proactive, risk-based oversight, including longitudinal tracking of declarations, automated risk profiling, and robust enforcement mechanisms; without such reforms, transparency risks remaining largely symbolic.

--> 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

The Whistleblowing Act underwent three amendments in its first year of enactment in 2023. These amendments introduced minor changes to ensure consistency with the Directive and other national legislation. Some general provisions and exceptions to the scope of the Act were clarified, as were the procedural powers of the CPDP as an external whistleblowing authority. In terms of improving protection for whistleblowers, it is important to note the new provisions introducing corrective and interim measures to prevent or stop retaliation against whistleblowers.

The fourth batch of amendments was adopted in 2025 to address some of the remaining gaps in the full transposition of Directive (EU) 2019/1937. These amendments were made in response to criticism from the European Commission (EC) and form part of the implementation of the National Plan for Recovery and Sustainable Development. They provide more effective protection for a wider range of whistleblowers, including those about to start work and those who report abuses after leaving a job. The two-year deadline for reporting violations has also been removed. Some of the main changes include:

- Narrowing the cases in which the law doesn't apply on the grounds of professional secrecy (With regard to persons practising a legal profession, the exception covers only the confidentiality of conversations and correspondence between lawyers and their clients)
- Extending protection to people who are about to start work or who report abuse after their employment relationship has ended.
- Removal of the two-year statute of limitations for whistleblowing cases, which was unjustified and seen as politically motivated.
- An explicit obligation is introduced for the external reporting channel to confirm receipt of a report immediately and in all cases within seven days of receipt. There is also an obligation for the employees of the CPDP to promptly forward the information to the relevant competent institutions, but in any case, within seven days of receiving the report.
- Differentiating some of the penalties for failing to comply with the law
- The amendment does not ease restrictions on anonymous whistleblowing, a measure that could improve reporting and safety for whistleblowers.

Although Bulgaria has made progress in terms of its whistleblower protection legislation, the system is still evolving. Several obstacles remain, including a lack of awareness among institutions and the general public, limited confidence in reporting mechanisms, a reluctance to report due to fear of retaliation and inadequate penalties for violations. A culture of silence continues to prevail over a culture of whistleblowing. The low number of reports filed, and decisions made indicates that whistleblowing in Bulgaria is underutilised, with employees showing limited trust in or interest in the system.

Public disclosure of information about irregularities is still not regulated in detail. At the same time, there has been an increase in the number of SLAPP (Strategic Lawsuits Against Public Participation) lawsuits - usually unfounded and disproportionately large claims, mainly for defamation, against journalists, media outlets, activists, and NGOs.

Stronger protections and an improved culture of trust and transparency are still needed.

Information on the number of whistleblowing reports submitted and reviewed is contained in the National Authority's (CPDP) communication to the EC, submitted midway through each calendar year for the previous year, and in the Ombudsman's annual report, based on conducted audits. For this reason, data for 2025 is not yet available.

[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

Public procurement integrity stands at the centre of sector-specific corruption risks.

A primary example is the healthcare sector, where an exemption, adopted in 2016, has allowed private hospitals to avoid competitive bidding - draining about BGN 100 million (EUR 51 million) from the National Health Insurance Fund annually. While it is positive that Parliament moved toward closing this loophole in May 2025, the delay in final adoption is concerning.

Corruption risks and allegations in public procurement often involve manipulation of complex technical details, which the oversight authorities, the media and the general public have difficulties deciphering. The Chiren Gas Storage expansion, investigated by the EPPO, serves as another case in point. The contracting authority Bulgartransgaz opted for cheaper, riskier vertical drilling despite decades of expert advice favouring horizontal wells for safety. The Anti-Corruption Fund revealed that the technology was switched after the contract was signed, yet the price was never lowered, sparking suspicions of misappropriation. This project, supported by EUR 78 million in EU funds, is currently under investigation by the European Public Prosecutor's Office (EPPO).

The probe caused significant public outcry in 2025 when Bulgaria's European Prosecutor, Teodora Georgieva - in charge of the Chiren Gas Storage case - was suspended following numerous allegations and counter-allegations for undue political pressure and influence on the appointment and the work of the Bulgaria's European Prosecutor. As of 2026, the project and the investigation remain stalled.

In Sofia, the tendering for new waste management contracts, the largest single pieces of municipal public procurement in the country were reportedly deliberately sabotaged, including by arson attacks and the denial of licenses, effectively blocking the renewal of contracts. The municipality's move to centralize procurement under a new internal anti-corruption unit is seen as a positive step, which however has failed to produce convincing

results.

A notable positive development from November 2025 is the introduction of ODIS, an AI-assisted public procurement audit platform, developed by INSAIT (a leading European AI institute based in the Sofia University). By using artificial intelligence to detect discrepancies in the Electronic Public Procurement Platform, the State Audit Office of Bulgaria has vowed to cut audit times by seventy-five percent while improving transparency.

[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

C. Repression

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

5000 character(s) maximum

While the domestic legal structure criminalizes active and passive bribery in general terms, it fails to provide the explicit and comprehensive regulation of foreign bribery required by international benchmarks. Although the National Anti-Corruption Strategy 2021 - 2027 prioritizes the introduction of a specific foreign bribery offense to align with 2023 OECD recommendations, legislative momentum stalled throughout 2024 and 2025.

The practical impact of these legislative gaps is reflected in the near-total absence of enforcement. There are currently no publicly known cases of completed foreign bribery prosecutions in Bulgaria, and the volume of preliminary inquiries remains negligible or entirely undisclosed. Since 2017, only one long-running investigation has been recorded, yet it remains stagnant at the pre-trial stage. This happens at the backdrop of considerable risks of foreign state-backed strategic corruption as identified, for example in a series of international analyses The Kremlin Playbook produced by the Center for the Study of Democracy. At the same time, Bulgaria remains the EU country with the highest number of Magnitsky-style sanctions introduced by the US and the UK, practically all of which are related to allegations of strategic corruption and foreign influence. These risks have been highlighted in ongoing cases of public concern, such as the sanctioning of Lukoil enterprises in Bulgaria, the signing of a long-term agreement with the Turkish gas monopoly Botas, TurkStream/Balkanstream construction, etc.

Structurally, the system lacks the specialized reporting channels and analytical units necessary to identify foreign bribery risks. By relying on general anti-money laundering and corruption mechanisms, the state has failed to cultivate the investigative expertise required for sophisticated security-related financial crimes. Furthermore, persistent delays in international legal assistance and a lack of institutional specialization in cross-border asset tracing represent significant risks. This comes at the back-drop of a considerable increase in the volume of illicit financial flows in the region and in Bulgaria. As documented by the Center for the Study of Democracy (CSD) in its investigations into sanctions evasion and the war in Ukraine, these flows have reached alarming levels. According to CSD Policy Brief No. 157, IFFs in ten non-EU regional countries – including the Western Balkans, Georgia, Moldova and Ukraine - have reached USD 31 billion in 2023 alone.

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

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

A. Media authorities and bodies

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

The institutional landscape for media governance in Bulgaria has been undergoing a transition from a traditional self-regulatory model toward a structured co-regulatory regime. This shift is primarily driven by the implementation of the European Media Freedom Act (EMFA) in August 2025 and the subsequent alignment of national legislation with the Digital Services Act (DSA) through amendments to the Electronic Communications Act (ECA) in November 2025.

The legal architecture for media oversight has been fundamentally altered by the designation of the Communications Regulation Commission (CRC) as the national Digital Services Coordinator (DSC). Under the newly amended Electronic Communications Act, a multi-authority enforcement model has been established, integrating the CRC, the Council for Electronic Media (CEM), and the Commission for Personal Data Protection. This framework marks a move toward co-regulation, where state authorities supervise the fulfilment of systemic obligations by intermediary service providers. Specifically, the CRC is now empowered to certify out-of-court dispute settlement bodies and award the status of "trusted flaggers" to specialized entities, creating a formal procedural bridge between civil society and state regulation.

However, despite this appointment, the lack of adequate empowerment through legislation and effective enforcement has hindered compliance, triggering infringement procedures by the European Commission. As systematically demonstrated in the Center for the Study of Democracy (CSD) own analytical work on disinformation, media capture, and foreign information interference, most notably in its reports *Fractured Mirror: Identity Narratives and Polarisation in Bulgaria* and *Webs of Deceit*, the Bulgarian digital information environment remains structurally vulnerable. These vulnerabilities are characterised by persistent disinformation campaigns, frequently linked to external actors such as the Russian Federation, alongside low media literacy levels and insufficient transparency on the part of digital platforms. CSD's regular monitoring of the DSA and CoPD implementation within the BROD hub has shown that these structural gaps are exacerbated by delayed legislative action, fragmented institutional mandates, a lack of a national strategic framework, and an absence of trusted flaggers and fact-checking resources, further complicated by the country's smaller market disadvantage.

The National Council for Journalism Ethics (NCJE) continues to operate as the central self-regulatory body, administering the Ethical Code of Bulgarian Media. Legal scholars emphasize that while the Code remains a voluntary instrument, it serves as a critical standard for the judicial assessment of professional diligence. Courts increasingly reference the Code to determine whether a media provider has met the threshold of "good faith" in cases involving defamation or the balancing of public interest against private rights. However, as the Center for the Study of Democracy (CSD) has repeatedly flagged in its reports, the effectiveness of this self-regulatory

layer is compromised by "corrosive" political and economic influence. Opaque ownership structures and the use of state advertising as a tool for political favouritism have created an environment where ethical independence is often secondary to oligarchic interests.

The transition to new regulatory models occurs against a backdrop of deep societal scepticism and geographic fragmentation in media trust. Data from 2025 indicates that trust in mainstream media is limited to 29% of the population, with significant regional variations ranging from 16% to 43%. This distrust creates a vacuum that is increasingly filled by fringe outlets and social media, which accounts for 44% of news consumption. While television remains the dominant source for 66% of respondents, the 2025 GLOBSEC Trends report highlights a heightened vulnerability to conspiratorial narratives, particularly among older demographics. Over 60% of respondents aged 55 and above endorse at least one tested conspiracy theory, often reflecting the "hidden elites" narrative. These patterns suggest that pure self-regulation, which relies on public recognition of ethical "brands," is struggling to maintain legitimacy in a polarized information environment.

The stagnation of domestic reforms, including the suspension of the Ministry of Culture's EMFA working groups in late 2025, has left the implementation of co-regulatory safeguards largely to European-level mechanisms. The absence of a national strategy for countering information manipulation and the continued deadlock over the leadership of public service broadcaster BNT further weaken the domestic oversight ecosystem. The current challenge lies in reconciling the high standards of the EMFA and DSA with the "legislative inertia" of the Bulgarian state.

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

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

[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

The high concentration of media ownership in Bulgaria significantly restricts pluralism and impedes the public's right to access diverse, impartial information. As highlighted by the Center for the Study of Democracy (CSD) in its Supporting Media Freedom in Europe brief, the systematic acquisition of media assets by a limited number of groups affiliated with business and political interests has narrowed the spectrum of perspectives available over the past decade. This structural alignment allows owners to exercise editorial interference, leveraging platforms to advance commercial agendas or settle scores rather than providing objective reporting.

The institutional integrity of public service media remains susceptible to the perceived lack of political neutrality within the Council for Electronic Media (CEM). As digital platforms increasingly dominate the information ecosystem, the alignment of regulatory appointees with specific political cohorts risks creating a subtle framework of soft censorship, potentially compromising the statutory independence and objective mandate of public broadcasters. Simultaneously, the autonomy of private outlets is threatened by their owners' interests in other regulated sectors, often subordinating news delivery to hidden corporate motives.

The legal and regulatory framework for ownership transparency entered a critical transition phase during the second half of 2025 following the full application of the European Media Freedom Act (EMFA) in August. Despite the existence of the CEM public register and the Ministry of Culture's register of beneficial ownership, the enforcement of disclosure obligations remains insufficient. Legal experts highlight that these registers often serve a formalistic function, failing to reveal the underlying financial equity or the complex corporate structures used by beneficial owners to remain anonymous. As evidenced by the CSD in its Pravda's Web study and Operation "Disinformation" report, this transparency deficit is particularly pronounced in "mushroom" website networks, which operate with opaque ownership to disseminate coordinated disinformation while evading sanctions envisioned by the Law on the Mandatory Deposition of Printed and Other Matters. The persistent lack of enforcement, evidenced by the absence of fines for non-disclosure in 2025 despite documented violations, continues to facilitate shadow media outlets that undermine market plurality.

The regulatory environment has also been shaped by institutional adaptation to the Digital Services Act (DSA), leading the European Commission to issue a Reasoned Opinion in May 2025. This pressure culminated in the November 2025 amendments to the Electronic Communications Act (ECA), which designated the Communications Regulation Commission (CRC) as the national Digital Services Coordinator (DSC) and granted the CEM supervisory powers over video-sharing platforms. A notable legal debate preceded these amendments regarding a proposal for a Public Council on Digital Services. This was strongly opposed by the CRC, which argued that such a body would infringe upon the absolute independence required under Article 50 (2) of the DSA. While the final framework rejected the Council, it introduced a public register of administrative acts related to illegal content removal. Additionally, the Ministry of Electronic Governance intervened in October 2025 to block a fragmented draft Law on Artificial Intelligence, emphasizing that AI reporting mechanisms must be integrated within the existing DSA framework.

As emphasized in CSD's Forging the European Democracy Shield brief and Media Financing in Europe report, Bulgaria continues to face systemic risks to media independence driven by weak financing models, social platform dominance and persistent exposure to disinformation. Despite formal improvements in the digital regulatory network, limited transparency of beneficial ownership and insufficient safeguards for editorial autonomy leave journalism vulnerable to corporate, political and legal pressures. Defamation proceedings, employment actions, and attempts to criminalize reporting illustrate how legal and corporate mechanisms are misused to restrict scrutiny. To address these challenges, EU instruments, such as the EMFA, should enforce full disclosure of media ownership and funding, condition financial support to robust editorial independence and anti-SLAPP safeguards, and strengthen judicial oversight to prevent the abuse of legal tools as instruments of interference.

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

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

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

The accelerated legislative process in Bulgaria, driven by delays in implementing the Recovery and Resilience Plan (RRP), has continued to affect the quality and transparency of law-making. Fast-tracked legislation linked to EU funding has often been adopted with limited impact assessments and shortened consultations. The subsequent annulment of key reforms by the Constitutional Court highlights the consequences of these weaknesses, yet no systematic corrective measures have followed.

Based on the Centre for the Study of Democracy's monitoring, formal rules on impact assessments and public consultations remain unevenly applied in practice. Consultations are frequently treated as procedural requirements rather than as tools to improve legislative quality, contributing to legal instability and reduced trust in the policy-making process.

Since 2023, CSD has actively participated in policy discussions on lobbying regulation and government transparency, including work on a draft Law on Transparency and Integrity in Government in 2025. Civil society engagement has sought to ensure that European recommendations are implemented in a way that strengthens transparency without introducing disproportionate restrictions on civil society.

In July 2025, the Ministry of Justice published an impact-assessment questionnaire related to the draft law, without making the draft legislation public. CSD and other civil society organisations submitted a joint response in August 2025, but no feedback or further developments have since been communicated. This reflects a broader pattern of limited follow-up to consultations, reducing their effectiveness and impact on final legislation.

[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

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

5000 character(s) maximum

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

5000 character(s) maximum

Regime for constitutional review of laws

5000 character(s) maximum

B. Independent authorities

Independence, resources, capacity and powers (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 2023 Whistleblower Protection Act strengthened the institutional framework by empowering the Ombudsman to audit the Commission for Personal Data Protection (CPDP). Together with the recent appointment of long-vacant regulators, including the Commission for Protection against Discrimination, these developments were initially welcomed as steps towards restoring institutional capacity, although the appointment process has been widely perceived as politically influenced, raising concerns about independence.

The Ombudsman's audit covering 1 January–30 September 2024, included in the annual report to the National Assembly, provides a credible and valuable assessment of whistleblower protection in practice. The findings reveal persistent gaps in safeguarding individuals who report irregularities, including corruption, leading civil society organisations to characterise existing protections as largely symbolic.

A key concern is the failure to ensure automatic identity protection from the moment a report is submitted, as required by EU law and Directive (EU) 2019/1937. By requiring whistleblowers to disclose their identity in order to receive protection, the CPDP creates a strong deterrent to reporting and exposes individuals to heightened risks of retaliation, particularly at local level.

The Ombudsman's ability to conduct on-site inspections and publicly document these shortcomings represents an important safeguard. However, continued delays and inconsistent practices underline weaknesses in executive implementation. Without making confidentiality the default and ensuring effective remedies, whistleblower protection risks remaining a formal commitment rather than a practical tool for accountability.

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

[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

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

[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

In 2025, the European Court of Justice (Joined Cases C-313/23, C-316/23, C-332/23) addressed questions regarding judicial independence and the application of the General Data Protection Regulation in Bulgaria, concerning the Inspectorate and the Supreme Judicial Council. Despite the Court's clarifications, no legislative amendments have been adopted to implement its findings, leaving systemic safeguards against institutional deadlocks insufficient. The Bulgarian Constitutional Court, currently seized with a case on the mandate of the Acting Prosecutor General, should align its interpretation with EU law standards.

Additionally, several ECtHR and ECJ rulings on LGBTIQ+ family rights remain unimplemented. These gaps illustrate the broader link between human rights and the rule of law: delays or failures in implementing supranational judgments leave vulnerable groups without effective legal protection. Ensuring timely and comprehensive follow-up to such rulings should be an integral part of rule of law reforms in Bulgaria.

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

5000 character(s) maximum

D. The enabling framework for civil society

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

5000 character(s) maximum

Currently, Bulgaria has no general civil society strategy in place outlining the participation of civil society organisations in decision-making processes. The last such strategy was adopted in 2012 and expired in 2025. There is no dedicated policy or framework to enhance and protect an enabling environment for human rights defenders. On the contrary, some actions, related to civic participation dedicated to LGBTIQ rights, that took place over the past years are seen as increasing the risk of restricting the ability of civil society to work on fundamental rights and having a freezing effect of their work.

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

On 5 November 2025, the Parliament established a Temporary Commission tasked with investigating the activities and funding of George and Alexander Soros and their foundations operating in Bulgaria. The mandate of the Commission included examining any financial support provided by these foundations to Bulgarian individuals, legal entities, and non-governmental organisations, as well as assessing potential links between the foundations and political parties, state institutions, media outlets, educational institutions, business structures, and other civil society actors.

The Temporary Commission was composed of 17 members of Parliament representing all parliamentary groups. Its procedural powers allowed it to request and analyse documents, summon and hear representatives of state services and institutions, as well as individuals or representatives of organizations who could contribute to clarifying the circumstances under review. The Commission was given a three-month term to complete its work and issue a report detailing its findings.

While formally framed as a fact-finding and oversight mechanism, the establishment of the Commission has a notable chilling effect on the targeted organizations and broader civil society activity, as it created an environment of increased scrutiny and potential reputational risk for entities receiving non-Bulgarian funding. The closure of the Commission (in mid-January 2026) is currently being discussed in Parliament. A vote is pending.

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

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

5000 character(s) maximum

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

8bef70bd-2666-4bd3-867f-9298687ca570/ANNEX_References_.pdf

Contact

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