

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

Reporters Without Borders / Reporters sans frontières (RSF)

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

<https://rsf.org/en>

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

612547127497-45

* 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

Julie

Surname

Email Address of the organisation

secretariat@rsf.org

* 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

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

Independence/autonomy of the prosecution service

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

B. Quality of justice

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

[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.)

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

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

5000 character(s) maximum

[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

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

5000 character(s) maximum

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

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

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

5000 character(s) maximum

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

[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

[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

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

No structural reform was adopted in 2025 to address the issues flagged since 2024. Practice continued to deteriorate with high-profile newsroom pressure, rising SLAPP pressure, and legislative initiatives that could further limit media freedom.

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

Bulgarian National Television (BNT) continued to face institutional instability linked to the long-running dispute over the appointment of its Director General; this prolonged situation undermined perceptions of the public broadcaster's stable, independent governance.

Despite his term expiring in July 2022, Emil Koshlukov remained the acting Director General of BNT throughout 2025 because the selection process for a new Director General was tied up in litigation and procedural disputes. A key court hearing related to the 2022 competition was postponed again in February 2025, extending the interim period.

In June 2025, the Supreme Administrative Court issued a final ruling that annulled a lower-court decision and effectively confirmed that the procedure had to be relaunched. However, the new selection process was repeatedly challenged in court throughout the year. By autumn 2025, court actions suspended the competition. While the Supreme Administrative Court later allowed it to continue, subsequent court decisions again halted the procedure, leaving governance uncertainty unresolved by the end of 2025.

[https://www.dnevnik.bg/bulgaria/2025/02/18/](https://www.dnevnik.bg/bulgaria/2025/02/18/4744801_sasho_iovkov_za_peti_put_provali_zasedanie_po_delo_za/)

[/4744801_sasho_iovkov_za_peti_put_provali_zasedanie_po_delo_za/](https://www.dnevnik.bg/evropa/evrofinansirane/beneficienti/medii/2025/06/23/4799344_koshlukov_ostava_oshte_neizvestno_vreme_shef_na_bnt/)

[https://www.dnevnik.bg/evropa/evrofinansirane/beneficienti/medii/2025/06/23/](https://www.dnevnik.bg/evropa/evrofinansirane/beneficienti/medii/2025/06/23/4799344_koshlukov_ostava_oshte_neizvestno_vreme_shef_na_bnt/)

[4799344_koshlukov_ostava_oshte_neizvestno_vreme_shef_na_bnt/](https://www.dnevnik.bg/bulgaria/2025/09/10/4827371_konkursut_za_nov_direktor_na_bnt_e_pred_proval/)

https://www.dnevnik.bg/bulgaria/2025/09/10/4827371_konkursut_za_nov_direktor_na_bnt_e_pred_proval/

[https://www.dnevnik.bg/bulgaria/2025/10/01/](https://www.dnevnik.bg/bulgaria/2025/10/01/4835386_koshlukov_ostava_sudebno_reshenie_spria_konkursa_za/)

[4835386_koshlukov_ostava_sudebno_reshenie_spria_konkursa_za/](https://www.dnevnik.bg/evropa/evrofinansirane/beneficienti/medii/2025/11/05/4848825_sudut_dade_zelena_svetlina_na_konkursa_za_nov/)

[https://www.dnevnik.bg/evropa/evrofinansirane/beneficienti/medii/2025/11/05/](https://www.dnevnik.bg/evropa/evrofinansirane/beneficienti/medii/2025/11/05/4848825_sudut_dade_zelena_svetlina_na_konkursa_za_nov/)

[4848825_sudut_dade_zelena_svetlina_na_konkursa_za_nov/](https://www.dnevnik.bg/bulgaria/2025/11/13/4851988_s_dve_resheniia_za_den_sudut_spria_i_vurna_konkursa_za/)

[https://www.dnevnik.bg/bulgaria/2025/11/13/](https://www.dnevnik.bg/bulgaria/2025/11/13/4851988_s_dve_resheniia_za_den_sudut_spria_i_vurna_konkursa_za/)

[4851988_s_dve_resheniia_za_den_sudut_spria_i_vurna_konkursa_za/](https://www.dnevnik.bg/bulgaria/2025/11/13/4851988_s_dve_resheniia_za_den_sudut_spria_i_vurna_konkursa_za/)

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

In 2025, the Commission on Journalistic Ethics (CJE) remained active, taking decisions in 23 cases.

<https://mediaethics-bg.org/category/reshenia/>

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

No comprehensive reform was adopted in 2025 to ensure full transparency and fairness in the allocation of state advertising, especially at the local/municipal level and through intermediaries (media agencies). Concerns persisted that the lack of a unified disclosure mechanism enables influence on editorial lines, disproportionately affecting smaller and regional outlets.

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

In 2025, multiple developments suggested continued vulnerability to political/administrative interference and pressure:

- Pressure and hostility toward reporters asking public-interest questions in Parliament remained a recurring issue (examples include refusals to engage and selective responsiveness by political figures).
- Access restrictions/accreditation problems were reported for specific journalists in the National Assembly, raising concerns about arbitrary practices and unequal treatment. AEJ-Bulgaria statement: <https://aej-bulgaria.org/category/%D0%BF%D0%BE%D0%B7%D0%B8%D1%86%D0%B8%D0%B8/>
- High-profile editorial conflict in a major private broadcaster (bTV): AEJ-Bulgaria described developments around the removal/dismissal of prominent morning-show journalists as emblematic of pressure on critical voices and called for solidarity actions.

<https://aej-bulgaria.org/43761/>

<https://aej-bulgaria.org/%D0%B2%D1%81%D0%B8%D1%87%D0%BA%D0%BE-%D0%B5-%D0%B2%D1%8F%D1%80%D0%BD%D0%BE-%D1%81%D0%B2%D0%B0%D0%BB%D0%B5%D0%BD%D0%B0-%D0%BE%D1%82-%D0%B5%D1%84%D0%B8%D1%80/>

- Legislative threat (criminal-law chilling effect): a draft amendment described by AEJ-Bulgaria as enabling severe sanctions against journalism advanced rapidly in Parliament in October 2025, illustrating risks from fast-track lawmaking without stakeholder review, later retracted:

<https://aej-bulgaria.org/%D0%B7%D0%B0%D1%82%D0%B2%D0%BE%D1%80-%D0%B7%D0%B0-%D0%B6%D1%83%D1%80%D0%BD%D0%B0%D0%BB%D0%B8%D1%81%D1%82%D0%B8-%D1%81%D0%B5-%D0%B4%D0%B2%D0%B8%D0%B6%D0%B8-%D0%BF%D0%BE-%D0%B1%D1%8A%D1%80%D0%B7%D0%B0/>

[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

In 2025, concerns persisted with practically limited enforcement of ownership-transparency obligations with continued growth of websites that conceal ownership while shaping public debate. The Ministry of Culture's

register remains the main official public reference point, but enforcement and verification were widely seen as weak.

https://www.dnevnik.bg/bulgaria/2025/12/09/4848628_ima_li_kontrol_vurhu_mediinata_sobstvenost/

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

No evidence of systemic improvement in 2025 sufficient to change the risk picture described in earlier cycles: intimidation/denigration of journalists and institutional weaknesses remained salient.

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

5000 character(s) maximum

In 2025, incidents during public events continued to raise concerns about police effectiveness and accountability. AEJ-Bulgaria documented a case where a NOVA TV crew was attacked while covering a protest and called for identification and prosecution of those responsible (2 Sep 2025): <https://aej-bulgaria.org/%D0%BF%D1%80%D0%BE%D1%82%D0%B5%D1%81%D1%82%D0%B8%D1%80%D0%B0%D1%89%D0%B8%D1%82%D0%B5-%D0%BD%D0%B0%D0%BF%D0%B0%D0%B4%D0%BD%D0%B0%D0%BB%D0%B8-%D0%B5%D0%BA%D0%B8%D0%BF-%D0%BD%D0%B0-nova-%D1%82%D0%B5/>

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 practices continued to produce chilling effects through costs/fees and litigation risk. AEJ-Bulgaria highlighted cases where journalists faced disproportionate financial burdens linked to FOI litigation and enforcement, potentially discouraging public-interest reporting:

13 Aug 2025 (court costs/fees chilling effect): <https://aej-bulgaria.org/%D0%B6%D1%83%D1%80%D0%BD%D0%B0%D0%BB%D0%B8%D1%81%D1%82%D0%B8%D1%82%D0%B5-%D0%BD%D0%B5-%D0%B1%D0%B8%D0%B2%D0%B0-%D0%B4%D0%B0-%D0%B1%D1%8A%D0%B4%D0%B0%D1%82-%D0%BE%D1%81%D1%8A%D0%B6%D0%B4%D0%B0%D0%BD/>

5 Sep 2025 (enforcement costs; journalist sanctioned twice for questions): <https://aej-bulgaria.org/%D0%B6%D1%83%D1%80%D0%BD%D0%B0%D0%BB%D0%B8%D1%81%D1%82%D0%BA%D0%B0%D1%82%D0%B0-%D0%B2%D0%B5%D0%BD%D0%B5%D0%BB%D0%B8%D0%BD%D0%B0-%D0%BF%D0%BE%D0%BF%D0%BE%D0%B2%D0%B0-%D0%B5-%D0%BD%D0%B0%D0%BA%D0%B0/>

In addition, the Ministry of Justice consulted on changes that would restrict access to property-register

documents (with significant implications for investigative journalism):

https://store.aip-bg.org/stanovishta/2025/Stanovishte_PDI_proekt_ZID_PV_13-11-2025.pdf

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

SLAPP/defamation pressure remained significant in 2025, with a prominent example being the final outcome against Mediapool and journalist Boris Mitov and chain cases against the investigate website Bird:
https://www.dnevnik.bg/bulgaria/2025/07/21/4810127_mediapul_beshe_osudena_okonchatelno_za_faktologichno/
https://www.dnevnik.bg/analizi/2025/07/22/4810396_sudut_otvori_nova_pechalna_stranica_v_delata_sreshtu/
https://www.capital.bg/politika_i_ikonomika/bulgaria/2025/07/21/4810091_v_slapp_delo_vurhoven_sud_osudi_mediapool_i_jurnalista/
<https://www.mediapool.bg/nyama-znachenie-dali-statiite-sa-prichinata-vks-osadi-mediya-i-zhurnalista-pripomnyane-na-fakti-za-magistrat-news373543.html>
<https://rsf.org/en/bulgaria-rsf-condemns-conviction-journalist-boris-mitov-slapp-case>

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

5000 character(s) maximum

RSF's recommendations

1) Safety of journalists

Government and political actors should refrain from, and publicly condemn, all denigration, vilification, intimidation and threats against journalists, including online attacks.

Join the Safety of Journalists Campaign; create contact points for journalists within law enforcement and relevant ministries; strengthen cross-ministry cooperation and set up inter-agency coordination structures for journalist protection, in line with EU standards.

Review and improve legislation: strengthen Criminal Code sanctions for attacks on journalists and establish a system to specifically recognise, record and categorise attacks against media workers.

Support early-warning and rapid-response mechanisms (hotlines, online platforms, 24/7 emergency contacts) run by journalists' organisations/civil society, so threatened journalists can access protection quickly.

Engage proactively with the Council of Europe Platform for the Safety of Journalists through regular dialogue with partner organisations and timely, detailed, substantive responses to alerts on Bulgaria.

2) Council for Electronic Media (CEM) and public broadcasters

The CEM process for appointing a new BNT Director General must be lawful, transparent, and conducted in good faith, without unjustified obstruction or delay.

Implement EMFA-aligned reforms to strengthen the editorial and institutional independence of BNT and BNR, while ensuring adequate, sustainable, and predictable funding.

Implement EMFA-aligned reforms to shield the CEM from political influence and strengthen its functional independence, supported by sufficient resources to ensure operational stability. This should begin with legislative changes to transpose Article 30(4) of the revised AVMSD, ensuring regulators have adequate financial/human resources and enforcement powers.

3) SLAPPs and defamation

Transpose and implement both the EU Anti-SLAPP Directive and the Council of Europe Recommendation to effectively address cross-border and domestic SLAPPs.

Incorporate CoE indicators for identifying SLAPPs into national law to help judges recognise such cases; use CoE expertise during drafting.

Continue training for judges, prosecutors, lawyers and police on European standards (defamation, SLAPPs, hate speech, access to information, whistleblower protection, and protection of sources), to align practice with ECtHR standards.

After the recent introduction and withdrawal of penal-code amendments strengthening criminal defamation, political parties should refrain from initiatives that weaken media freedom or represent a regression.

Ultimately, fully decriminalise defamation.

4) Media legislation and the EMFA

Swiftly align national law with the European Media Freedom Act through a transparent, inclusive process with expert journalist organisations and civil society.

Establish functional media ownership registries: centralised, fully operational, publicly accessible registers covering print, broadcast and digital outlets; frequent updates; beneficial ownership disclosure; rules covering indirect ownership and funding sources; and effective sanctions for non-disclosure/obfuscation.

Reform state advertising/public funding distribution: impartial, transparent, criteria-based allocation; ban political favouritism; mandatory publication of all contracts and spending at local, regional and national levels to enable scrutiny.

Make eligibility for state advertising/public funds conditional on registration and up-to-date ownership/beneficial ownership disclosure; consider also requiring adherence to the Code of Ethics of the Bulgarian Media.

Enforce existing rules limiting cross-ownership and concentration to strengthen pluralism; consider targeted policies supporting the financial sustainability and independence of regional/local media.

As part of anti-disinformation efforts, designate and empower a national Digital Services Coordinator and establish penalty rules under the Digital Services Act.

5) Journalistic profession

Journalists should strengthen solidarity via associations, unions and representative bodies to monitor reforms, document violations and improve working conditions.

Media and journalists' organisations should improve working conditions in line with labour law and European standards.

Implement the European Commission Recommendation (EU) 2022/1634 on internal safeguards for editorial independence and ownership transparency.

Negotiate collective agreements that include professional support for stress, burnout and other mental-health challenges.

Promote adherence to the Code of Ethics and adopt internal self-regulatory mechanisms to protect editorial independence from political, commercial and owner interference.

Bulgaria is ranked 70 out of 180 countries in RSF's World Press Freedom Index for 2025.

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

[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

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

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

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

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

Contact

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