

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

Transparency International Bulgaria

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://transparency.bg/>

Transparency register number

Check if your organisation is in the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making

* Country of origin

Please indicate the country of origin of your organisation

- ☐ Austria

- ☐ Belgium
- ☒ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovak Republic
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Other - please specify

First name

Surname

Email Address of the organisation

mbox@transparency.bg

* Publication of your contribution and privacy settings

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

- ☐ Anonymous - Only your type of respondent, country of origin and contribution will be published. Organisation name, URL, transparency register number, first name and surname given above will not be published. **To maintain anonymity, please refrain from mentioning the name of your organisation and any details from which your organisation can be identified in the rest of your contribution as we will not be able to guarantee anonymisation of these elements.**
- ☒ Public - Your personal details (name, organisation name, transparency register number, country of origin will be published with your contribution).
- ☐ No publication - Your contribution will not be published. Elements of your contribution may be referred to anonymously in documents produced by the Commission based on this consultation.

☒ I agree with the personal data protection provisions.

[Specific_privacy_statement_targeted_stakeholder_consultation_2026_rule_of_law_report.pdf](#)

Questions on horizontal developments

In this section, you are invited to provide information on general horizontal developments or trends, both positive and negative, covering all or several Member States. In particular, you could mention issues that are common to several Member States, as well as best practices identified in one Member State that could be replicated. Moreover, you could refer to your activities in the area of the four pillars and sub-topics (an overview of all sub-topics can be found below), and, if you represent a Network of national organisations, to the support you might have provided to one of your national members.

Overview topics for contribution

[List_of_topics_for_contribution.docx](#)

Please provide any relevant information on horizontal developments here

5000 character(s) maximum

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

In terms of the recommendation to '[e]nsure a robust track record of investigations, prosecutions and final judgments in high-level corruption cases and take further steps to ensure the effective performance of the Anti-Corruption Commission' – not only any steps have not been taken to improve the performance of the Anti-Corruption Commission (ACC), but even regular ACC members have not been elected. The three-member leadership of the ACC, meant to be in place by January 2024, have not been appointed by the end of 2025 – for no less than two years after adoption of the new legislation. The ACC continued to be led by the former members of the Commission for Counteracting Corruption and Illegal Assets Forfeiture (whose tenure has also expired), which undoubtedly hindered the effective implementation of the Anti-Corruption Law.

The Council of Ministers took some steps to respond to the 2025 recommendation: "to improve the integrity of top executive functions, taking into account European standards, in particular by ensuring that clear integrity standards for the Government as well as an appropriate sanctioning mechanism are in place" which aligns with a recommendation of GRECO under the Fifth Evaluation Round: "that (i) a comprehensive code of conduct for persons entrusted with top executive functions be adopted, published and complemented with clear guidance regarding conflicts of interest and other integrity related matters (contacts with third parties, gifts and other benefits, ancillary activities, contracts with state authorities, post employment restrictions etc.) and (ii) this code be accompanied with a credible and efficient supervisory mechanism, envisaging specific sanctions for violations and tools for their enforcement." A Working Group (WG) was established in March 2025 (by Order No. R-75 of March 26, 2025) for the preparation of draft amendments to the Administration Act and a draft of Code of Conduct for Persons Holding Public Office in the Central Executive Branch with representatives of the Chief Inspectorate in the Council of Ministers (CICoM), heads of inspectorates under the Administration Act, and representatives of 2 non-governmental organizations, members of the Civil Council to the National Council on Anti-Corruption Policies – the Bulgarian Institute for Legal Initiatives and Transparency International Bulgaria.

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

In mid-2025 an attempt to select and appoint ACC members was initiated: on 11 July 2025 the Parliament adopted rules of procedure of the Nomination Committee, meant to conduct a preliminary assessment of the ACC candidate members.

The invitation for proposal of candidates has been published four days later – on 15.07.2025 and the Nomination Committee itself has been summoned for their first meeting on 31 July 2025.

There were only four ACC candidates – three of them proposed by the ruling majority MPs and one – by a civil society organization. Another ‘coincidence’ was that the former three candidates were ACC employees (head /vice of directorate level), while the latter – a free practice lawyer.

According to the rules of procedure, the Nomination Committee reviewed the candidates’ documents, conducted eligibility checks and adopted Methodology for evaluation of the candidates. The Nomination Committee organised hearings on 22 August 2025.

On 27 August 2025 the Nomination Committee submitted their final report and proposal for appointment of ACC members based on the ‘overall comprehensive assessment’ to the parliamentary Committee on Prevention and Counteraction of Corruption (CPCC). All documents as regards the work of the Nominating Committee have been published at the Parliament website: <https://www.parliament.bg/bg/theme-site/ID/84>.

However, there are no indications of the review, discussion or any other follow-up actions on the side of the Parliament. According to the publicly available information, neither the CPCC, nor the Assembly have considered the Nominating Committee report and the voting of the ACC members appointment has never been included in the agenda of the Parliament.

We can see no reasonable explanation for Parliament not voting on the candidacies. Based on previous observations of the work of the ruling majority both within current legislature and in former parliaments, we could speculate that the ‘rush’ with the Nominating Committee was to only report some progress, most likely in connection with the submitting payment requests for the Recovery and Resilience Plan implementation.

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

1. The National Anti-Corruption Strategy 2021-2027 and the related Roadmap has not been implemented during 2025 at all. The National Council on Anti-Corruption Policies (NCAP) has not met since 2023, which is a clear sign of lack of any synchronised and coordinated actions at national level. In fact, the government which stepped in office in January 2025 (currently resigned) has even not appointed the political level members to the NCAP . The dedicated webpage on the activities of NCAP is no longer maintained – there is no information about any planned meetings, nor the archive about the past activities and decisions is publicly available. Milestone #226 (C10.R2: Anti-corruption) from the Bulgarian Recovery and Resilience Plan (RRP), namely ‘Annual analyses on the implementation of the National Strategy for Preventing and Combatting Corruption 2021-2027 and its associated Roadmap and annual reporting on the progress of implementation’ has been removed with the latest amendment of the RRP in November 2025 (COM(2025) 677 final). The measure provided for review and evaluation of the annual reports on the implementation of the National Anti-Corruption Strategy 2021-2027 by the members of the Civil Council of the National Council on Anti-Corruption Policies and where applicable – making proposals for improvement. The Strategy itself provided for periodical review and

progress evaluation (Priority 7, Measures 1 and 2), which never happened due to, as already stated, lack of the implementation reports themselves.

2. The national Recovery and Resilience Plan has been amended twice in 2025 – COM(2025) 379 final and COM(2025) 677 final. Both annexes reduced the scope of the originally foreseen milestones in the Reform C10. R2: Anti-corruption.

More specifically, in addition to the above discussed milestone #226, the following other milestones have been removed:

#221. 'Entry into force of the electronic platform and supporting legislative amendments to strengthen anti-corruption bodies and units' (original deadline for implementation Q2/2023).

#224. 'Introduction of tools for counteracting corruption and enhancing integrity in the activity of the state-owned enterprises (original deadline for implementation' Q1/2024). It should be noted that some elements of the original milestone have been carried over to a new measure #226a. Amendments to the Public Enterprise Law introducing the implementation of Corruption Risk Management Systems in state-owned enterprises and Code of Ethical Conduct for Persons employed in the SOEs have been adopted in December 2025.

#225. 'Verification mechanism for enhancing the integrity of the civil servants operational' (original deadline for implementation Q1/2025). The same as previous, some elements, of the milestone have been carried over to #226a, however substantially reduced in detail and clarity.

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

A Working Group (WG) was established in March 2025 (by Order No. R-75 of March 26, 2025) for the preparation of draft amendments to the Administration Act and a draft of Code of Conduct for Persons Holding Public Office in the Central Executive Branch with representatives of the Chief Inspectorate in the Council of Ministers (CICoM), heads of inspectorates under the Administration Act, and representatives of 2 non-governmental organizations, members of the Civil Council to the National Council on Anti-Corruption Policies – the Bulgarian Institute for Legal Initiatives and Transparency International Bulgaria. The well-facilitated work by the CICoM led to the completion of the tasks by the WG by the end of May 2025 and submission of a report to the Prime Minister in the beginning of June 2025, but since then no information on how the process will be finalized is communicated to the WG members, neither have any actions for public consultation of the draft amendments to the Administration Act and the draft Code of Conduct have been initiated. Obviously, the draft encountered passive resistance at the highest political level.

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

No measures to enhance transparency of public decision making in 2025 can be identified as completed and in force. The Government took some steps towards strengthening transparency and accountability of public decision making through the revival of the Working Group (WG) in the Ministry of Justice for the drafting of Lobbying Regulation and the WG in the Council of Ministers for the preparation of draft amendments to the Administration Act and a draft of Code of Conduct for Persons Holding Public Office in the Central Executive

Branch.

Being active part of both WGs Transparency International Bulgaria can share the following:

1. The draft Code of Conduct for Persons Holding Public Office in the Central Executive Branch presented to the WG in June 2026 as a result of its work included clear policy on gifts and privileges, texts regarding conflict of interest and rules for communication with stakeholders. But the draft was never published for public discussion and adopted by the Council of Ministers, hence there is still no ethical framework in place to strengthen the transparency, integrity and accountability of persons entrusted with top executive functions. What is more, the accompanying draft amendments to the Administration Act included not only regulations strengthening the accountability but also advanced the idea of integrity through the creation of a new role in the political cabinet of the Prime Minister – that of an integrity advisor.
2. The draft of the lobbying regulation called Transparency and Integrity of Governance Act was presented to the WG in the Ministry of Justice as a final result of its' work in June 2025 despite the fact that comments, positions and proposals on the texts were still being submitted by the members of the group and key issues were still under deliberation, including the material scope, definitions, responsible authority, and others. The draft Transparency and Integrity of Governance Act was not published for public consultation. Instead, a consultation was published on the 25th of July 2025 until the 25th of August towards carrying out an impact assessment in relation to conducting a full preliminary impact assessment of a project proposal with only the structure of the act (Chapter One GENERAL PROVISIONS, Chapter Two PRINCIPLES OF INTERACTION, Chapter Three TRANSPARENCY REGISTER, Chapter Four ADMINISTRATIVE AND PENAL PROVISIONS SUPPLEMENTARY PROVISION, TRANSITIONAL AND FINAL PROVISIONS) and a Questionnaire on the assessment of the impact of the Draft Transparency and Integrity in Governance Act. Half an year later nothing further was communicated or published on the draft.

Both of these initiatives for positive developments in the legislative framework were not completed despite being part of the government's commitments under strategic documents. As a representative of civil society and a member of both WGs the lack of clear planning and communication of the next steps positioned in a specific timeframe as part of the legislative process is both perplexing and disheartening, which is one of the reasons why citizens and CSOs loose trust in the legislative process and the importance of their participation in the drafting and consultation of legislative acts. Both processes also clearly demonstrate the necessity of urgent measures to improve the transparency of public decision-making.

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

No actionable measures to improve prevention of the conflicts of interest in the public sector have been introduced. The annulled from the RRP milestone #225 'Verification mechanism for enhancing the integrity of the civil servants operational' originally involved '[a]nalysis of the relevant legislation and bringing it in line with Article 61 of Regulation (EU, Euratom) 2018/1046 on the financial rules applicable to the general budget of the Union, as well as the Commission Notice providing Guidance on the avoidance and management of conflicts of interest under the Financial Regulation (OJ C 121/9.04.2021)'. The measure has been reworded and included in the latest RRP amendment reading 'Preparation of an analysis of the definition of conflicts of interest under national legislation and recommendation(s) for possible improvement(s)'. This is a significant backtrack and practically recognition that the plans for harmonising the national legislation with the applicable EU regulations are void. It is not specified who will be the addressee of the recommendations for possible improvement, nor there is commitment to introduce the respective legal amendments.

--> 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

No measures can be identified that could constitute improvement in the whistleblowing protection framework, nor towards encouraging reporting. The only change in the legal framework in 2025 that could encourage reporting is the 4th amendment to the Protection of Persons Reporting or Publicly Disclosing Information about Violations Act that finally removed the two-year limitation for reporting violations in Art. 10. Now that the restriction allowing reports to be processed only for violations that occurred within the past two years is removed whistleblowers may be encouraged to report misconduct from further in the past.

In terms of the number of reports and follow-up of these reports the annual reports by the Personal Data Protection Commission and the Commission for Combatting Corruption are yet to be published, hence we cannot provide information. Transparency International Bulgaria's monitoring of the implementation of the whistleblowing legislation and anecdotal evidence by stakeholders engaged in training initiatives show that the law is not effectively implemented; citizens, employees, potential whistleblowers are not aware of the possibilities and channels to submit reports; the protection and support measures regulated in the law are not effective and cannot be implemented in practice.

Reports by the National Audit Office (NAO) and the National Ombudsperson confirm and complement our observations.

A recently published report by NAO- AUDIT REPORT No. 0300201223

on the audit performed on the implementation of 'Measures for the Prevention and Counteraction of Corruption in the Spending and Management of Funds from European Funds' for the period from 01.01.2021 to 31.12.2023. (https://www.bulnao.government.bg/bg/documents/15559/OD_KORUPZIA_12.2025.pdf) comes to the conclusion that the existence of regulations for the protection of whistleblowers, as well as provisions in various internal acts of individual agencies, does not encourage individuals with information on corrupt practices to report to the responsible institutions. The results of the sociological survey conducted show that the main reasons for hesitation or unwillingness to report, both among beneficiaries of EU funds and applicants, as well as employees in managing authorities, are that around two-thirds of them do not feel protected and more than one-third do not trust the institutions.

Despite the fact that the audited period is 2 years passed, the observations and conclusions are still valid as no measures have been taken for information and communication campaign on the whistleblowing legislation and no changes have been made in the legislation or its operationalization for the effective implementation of the protection measures.

Similar observations and recommendations are made by the National Ombudsperson in the Second Report on the External Audit of the Central Body for External Reporting in the Republic of Bulgaria (https://www.ombudsman.bg/storage/pub/files/20250328150242_%D0%9E%D0%9A%D0%9E%D0%9D%D0%A7%D0%90%D0%A2%D0%95%D0%9B%D0%95%D0%9D%20%D0%94%D0%9E%D0%9A%D0%9B%D0%90%D0%94%20%D0%9E%D0%94%D0%98%D0%A2%20%D0%9A%D0%97%D0%9B%D0%94.pdf) published in March 2025. The report concludes that there is still no clarity with regard to the provision of support measures, no effective protection and that these issues create a further risk of discouraging whistleblowers to report.

[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

We observe backtrack in the transparency and accountability as regards public procurement (PP). PP is one of the most vulnerable to corruption sectors in Bulgaria. Even though since 2020 there operates a central PP portal, which to some extent is in line with the Open Contracting Data standard, there is much to be desired in the implementation of the applicable legislation.

More specifically, back in 2023 there has been adopted a new text of the article 38 of the Public Procurement Act (State Gazette 88/20.10.2023), imposing obligation for publishing of all information that is due to be public in form of monthly reports at the national Open Data Portal (<https://data.egov.bg/>). The regulation entered into force as of October 2024, providing for 1 year to the Public Procurement Agency (PPA) to implement the necessary technical settings. There was no published information throughout entire 2025 year.

It is worth to mention that up to 2023 PPA provided summary reports with information regarding awarded and amended public contracts twice a year (<https://data.egov.bg/organisation/e9a95e08-7759-497a-a478-55f331d59447/datasets>). This practice stopped in mid-2024, the last information published being full report of concluded and/or changed contracts for the 2023 year.

Our latest observations shows that the PPA has started publishing of data arrays; as of 21.01.2025, there is report for the period 01.01.2026-14.01.2026. The information is available only in JSON format, which, for technical reasons, does not allow us to review the information and assess the extent to which the requirements of the law have been met. In any case, there is no available summarised information for the years 2024 and 2025.

Regarding the intentions to reduce the proportion of single-bidder contracts and the use of negotiated procurement (without prior publication) procedure type – the PPA collects and publishes information on comparatively regular basis: <https://www2.aop.bg/politiki-i-strategicheski-dokumenti/npvu/tekushto-nabludenie-na-pazara/>. However, there is no publicly available information about any analyses made on that base or any specific measures taken to achieve the set targets, as specified in Targets #249 and #250 of the RRP.

Finally, all efforts to introduce Integrity Pacts in the field of public procurement have been systematically and purposefully blocked and thwarted, contrary to the commitment made with the Partnership Agreement between Bulgaria and the European Commission for the Multiannual Financial Framework 2021-2027 (Point 9. Summary of the planned actions to increase the administrative capacity to implement the funds covered by the partnership agreement, Pillar 3. Framework conditions aiming at 'improve[ment of] the implementation environment by further streamlining the rules and procedures for the management and control of EU funds'.

[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

In July 2025 amendments to the Criminal Code were adopted imposing harsher penalties for bribery, including foreign bribery – State Gazette 61/21.07.2025, <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=236209>. Fines were increased for the offences under art. 301 (officials requesting or accepting bribery), para 1, 2 and 3. Additionally, art. 301 para 4 introduces confiscation of up to one-half of the property of the guilty party and para 5 imposes criminal liability for abuse of function. Similarly, the fines have been increased with respect to persons offering bribe (art. 304, para 1, 2 and art. 304a), including in cases of abuse of function (art. 304, para 3).

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

2025 could be characterized as another “0” year with regard to new developments and implementation of anti-corruption measures and the overall anti-corruption framework with only one exception related to the legislative framework: amendments, adopted under the pressure of European commission, to the Public Enterprises Act (PEA), entered into force on 9 December 2025 that introduce two key obligations for the Public Enterprises and Control Agency (PECA). By March 2026, the Agency must develop a System for the Management of Corruption Risks (Art. 12, para. 12 PEA) and a Code of Ethical Conduct for persons employed in public enterprises (Art. 12, para. 13 PEA). All SOEs must implement the System within one month of its adoption, while the Code must be applied within 14 days of its publication on the Agency’s official website. In December 2025 amendments to the Public Entities Act. Whether and how these new regulations will be implemented in practice remains to be seen.

Otherwise, the anti-corruption framework set by the National Anti-corruption Strategy 2021-2027 and the Road Map for its implementation remain promises on paper. Despite systematic efforts by Transparency International Bulgaria to raise the issue with the Prime Minister (in his capacity of chair of the National Council on Anti-corruption Policies) by sending letters and requesting meetings dedicated to the anti-corruption strategy, no efforts by the Government to implement the strategy, monitor it, report on it, revise it and start the process of its evaluation and planning for the development of a new strategy can be identified in 2025. The National Council on Anti-corruption Policies (NCAP) hasn’t had a single meeting in 2025 and the report for the implementation of the strategy in 2024 has not been reviewed and adopted.

A concerning change in the structure in terms of leadership of NCAP was done in the end of 2025. By Resolution No. 271 of the Council of Ministers dated December 3, 2025, amending and supplementing Resolution No. 136 of the Council of Ministers from 2015 on the establishment of the Council, its composition has been updated. According to the envisaged changes, the Minister of Justice is appointed as the Chairman of the NCAP, and the Head of the Chief Inspectorate to the Prime Minister is appointed as Secretary. The transfer of the chairmanship from the Prime Minister to the Minister of Justice is a worrying signal regarding the recognition of the council's role, significance, and importance for the national anti-corruption policy.

What is more, the lack of implementation, monitoring and revision of the national anti-corruption framework and the lack of efforts dedicated to the national anti-corruption policy is further evidenced by the fact that by the end of 2025 the anti-corruption measures outlined in the National Programme for Development of Bulgaria 2030, the National Recovery and Resilience Plan, and the National Anti-corruption Strategy are not synchronized in terms formulation of measures and their content, nor in terms of implementation timelines.

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

(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

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

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

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

Public consultations within the legislative process are not the rule. On the contrary, as a matter of practice, substantive policy issues are frequently settled through legislation adopted under procedures commonly referred to as “fast-track”, which do not require public debate, stakeholder involvement or meaningful participation of interested parties, including social partners. Under this practice, pre-drafted provisions—sometimes entire draft laws—are transmitted informally to a Member of Parliament, who then exercises the right of legislative initiative by tabling the text in Parliament. In such cases, there is no obligation for prior public consultation or stakeholder engagement. This approach is often used by the Government to secure the adoption of legislation on sensitive topics without substantive debate, scrutiny, or transparent justification, thereby undermining evidence-based policy-making and leaving little room for ex ante assessment of regulatory impacts.

Even where public consultations have been organised, a practice persists—contrary to the requirements of the Constitution of the Republic of Bulgaria—of introducing amendments at the second reading, and even tabling entirely new provisions at the final vote, without those texts having been discussed in the specialised parliamentary committees even by Members of Parliament.

A further recurring technique is the regulation of specific topics through amendments inserted into laws that do not govern the relevant subject matter (“omnibus” or non-germane amendments). As a result, affected stakeholders remains unaware that legislative changes are being prepared and, in practice, may only learn of them after they have been enacted. Given the very high volume of legislative acts adopted annually (more than hundred yearly), it is unrealistic to expect citizens and many stakeholders to track all changes effectively. Another particularly worrying practice is the delegation to administrative authorities of powers to regulate important topics through the adoption of primary rules of conduct (original norm-setting) which, under constitutional principles, should be established by statute. This transforms the administration from an executor of the law into a de facto law-maker, exercising broad discretion as to the content of the rules. Such arrangements also materially constrain the possibilities for effective judicial review over administrative acts and actions.

The excessive legislative output of the National Assembly, combined with the proliferation of secondary legislation, implementing acts and guidance, and the frequent amendments thereto, results in legal uncertainty and undermines the ability of addressees of legal norms to plan and to align their conduct with the applicable rules. These factors impede compliance with the requirements of legal certainty and foreseeability as integral components of the principle of the rule of law.

[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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