

**RECENT DEVELOPMENTS IN THE RULE OF LAW
PROGRESS ON THE IMPLEMENTATION OF THE RECOMMENDATIONS
OF THE BULGARIA COUNTRY CHAPTER IN THE 2025 ANNUAL RoL REPORT**

8 JUNE 2026

Recommendation 1 — Long-term secondment of judges

"Take steps to adapt the relevant legislative framework to avoid long-term secondment of judges to fill in vacant positions, taking into account European standards on secondment of judges."

The legislative framework governing the secondment of judges is closely linked to the appointment powers of the Supreme Judicial Council (SJC), which has continued to operate with an expired mandate. In this context, the Ministry of Justice has prioritised the renewal of the mandates of both the SJC and the Inspectorate to the Supreme Judicial Council (IJS) through draft Amendments to the Judicial System Act (*see the progress under Recommendation 2*). Once a renewed SJC is in office, regular competitions for filling vacant judicial positions can be conducted.

The prolonged exercise of functions by a Supreme Judicial Council with an expired mandate, while operationally constraining, is itself part of the broader institutional concern addressed by the recommendations of the 2025 Rule of Law Report. The Ministry of Justice's current approach therefore focuses on restoring the regular functioning of competition-based appointment procedures as a prerequisite for reducing reliance on long-term secondment mechanisms.

In this context, the amendments to the Judicial System Act aimed at implementing recommendations on long-term secondment of judges by the European Commission and the OECD were not included in the three draft bills submitted to the National Assembly in May 2026. **These elements will be further developed once the renewed SJC is able to resume its full constitutional and statutory functions.**

In a previous draft Law amending and supplementing the Judicial System Act, published for public consultation for the period from 19 December 2024 to 8 January 2025, the following measures were proposed:

- Clarification of the provisions on competitive procedures to ensure timely regular competitions for promotion, in order to avoid long-term secondment

of judges to fill vacant positions, taking into account European standards on the secondment of judges;

- Improvement of the regulatory framework on performance appraisal;
- Advancing legislative amendments aimed at improving the functioning of the Inspectorate to the Supreme Judicial Council (ISJC) and preventing the risk of political influence, in particular through the involvement of judicial authorities in the selection of its members.

At the same time, provisions have been drafted aimed at strengthening the independence of the prosecutor responsible for investigating offences committed by the Prosecutor General or by his/her deputy, in response to the recommendations of the 2025 Rule of Law Report and the OECD, which do not require Constitutional amendments.

A number of opinions have been submitted on the draft law during and after the public consultations period.

For the proposals concerning amendments to the Judicial System Act (regarding secondment, competitions, appraisal, etc.) that were not included in the bills submitted to the National Assembly in May 2026, **a working group is being set up to review the draft law prepared by the Ministry of Justice and to continue the legislative procedure.**

Additional information:

Initiative of the Ministry of Justice to introduce a Concept for a Mechanism for institutional protection and support of magistrates

In recent years, cases involving pressure, threats, media attacks, discrediting campaigns, physical assaults and other forms of improper interference against judges, prosecutors and investigating magistrates in connection with the exercise of their functions have been observed both in the public sphere and within the judicial system. These actions pose a risk not only to the personal security and professional independence of the individual magistrates concerned, but also to the proper functioning of the judiciary as a whole, including through the creation of a so-called “chilling effect” on other members of the judicial system.

In response to these challenges, the Ministry of Justice undertook actions aimed at developing an institutional mechanism for the protection and support of magistrates subjected to pressure, threats or other forms of improper interference related to the exercise of their functions.

For this purpose, a working group was established with the participation of representatives of the professional community, non-governmental organisations and experts with relevant practical and academic experience. Within the framework of the group's work, international and European standards concerning the independence, security and well-being of magistrates were analysed, together with the specific manifestations of pressure and improper influence identified in the Bulgarian context.

In the process of developing the concept, the Ministry of Justice established contacts with international partners through the Network of Rule of Law National Contact Points and with representatives of several Ministries of Justice of EU Member States through Legicoop – the online forum of the Legislative Cooperation Network between the Ministries of Justice of the European Union. Contacts were also established through the European Network of Councils for the Judiciary (ENCJ), as well as through the established cooperation with representatives of the Norwegian Courts Administration.

As a result of these efforts, a comparative analysis of practices in Germany, France, the Czech Republic, Poland, the Netherlands, Portugal, Sweden, Latvia, Romania and Norway was carried out, focusing on measures aimed at ensuring adequate support and protection for magistrates in situations involving threats, attacks, pressure or other forms of improper interference related to the performance of their functions.

During the course of the work, various forms of risk affecting magistrates were examined, including:

- physical threats and attacks;*
- media attacks and discrediting campaigns;*
- institutional pressure;*
- misuse of disciplinary, career-related and criminal law mechanisms;*
- unlawful surveillance and online harassment;*
- impact on the professional and psychological well-being of magistrates.*

Based on the analysis conducted, the Ministry of Justice drafted a concept for the establishment of an institutional mechanism aimed at ensuring early identification of risks, objective assessment of threats and timely implementation of adequate protection and support measures.

The concept proposes measures that build upon the existing mechanisms for physical protection and introduce a more modern, preventive and personalised approach to risk management.

Within the framework of the initiative, the following accompanying documents were also prepared:

A draft new Instruction on the conditions and procedure for organising and providing protection to judges, prosecutors and investigators, proposing the repeal of the currently applicable Instruction No. I-1 of 2 October 2025;

A draft training programme on personal security and prevention, aimed at enhancing situational awareness, digital and family security, as well as improving awareness of the available institutional support mechanisms;

A draft Handbook for the support of magistrates subjected to pressure, threats or other forms of improper interference related to the exercise of their functions.

The developed concept aims to establish a sustainable institutional framework for the protection and support of magistrates, while at the same time contributing to strengthening judicial independence, enhancing professional security and increasing public trust in the justice system and the rule of law.

The draft Concept remains to be approved and endorsed.

Recommendation 2 — Functioning of the Inspectorate to the SJC

"Advance with the draft legislative amendments aiming at improving the functioning of the Inspectorate to the Supreme Judicial Council and avoiding the risk of political influence, in particular by involving judicial bodies in the selection of its members."

The Ministry of Justice considers the effective functioning of the IJSC essential for strengthening confidence in the mechanisms of judicial governance and accountability. In this regard, the Ministry's current approach focuses on establishing a more transparent, professional and institutionally balanced procedure for the election of members of the IJSC, including through stronger involvement of judicial bodies and enhanced safeguards against undue political influence.

The Ministry also takes note of the importance of the case-law of the Court of Justice of the European Union concerning the consequences of the prolonged exercise of functions by bodies operating beyond the expiry of their mandates, including as regards the independence and legitimacy of the IJSC.

The draft amendments to the Judicial System Act submitted to the 52nd National Assembly directly address this recommendation.

Three bills have been introduced by Members of Parliament in the 52nd National Assembly:

- Draft Law Amending and Supplementing the Judicial System Act, No. 52-654-01-37/May 11, 2026, submitted by Member of Parliament Olga Borisova and a group of Members of Parliament:

According to the rationale for the bill, the proposed amendments are driven by the need to overcome the ongoing institutional crisis in the judicial system bodies, manifested in the continued operation of the Supreme Judicial Council and the Inspectorate to the Supreme Judicial Council despite expired terms, legal uncertainty regarding the legitimacy of some of their decisions, persistently low public confidence in appointment and promotion procedures, and accumulated doubts regarding a lack of transparency, dependencies, and unregulated influences within the judicial system.

Furthermore, the continuation of the full scope of powers of the Supreme Judicial Council after the expiration of the term of office of its elected members creates conditions for the adoption of appointment and promotion procedures and organizational decisions with long-term effects by a body whose democratic and professional representativeness has been exhausted. Therefore, it is proposed to limit certain powers of the SJC concerning the organization and functioning of the judicial system or its independence, such that these powers may be exercised only in exceptional cases, when it can reasonably be assumed that the normal functioning of the relevant judicial authority would be jeopardized.

The draft Law is also motivated by the need to introduce additional safeguards against the recurrence of concentrated influence within the judicial system, in this regard, it is proposed that a restriction be introduced preventing individuals who have recently held the highest positions in the judiciary, as well as their deputies or those appointed on a long-term basis to perform such functions, from being directly elected as members of the Supreme Judicial Council.

- Draft Law Amending and Supplementing the Judicial System Act, No. 52-654-01-9/April 30, 2026, introduced by Member of Parliament Velislav Velichkov and a group of Members of Parliament:

According to the explanatory memorandum, the draft Law aims to temporarily restrict the powers of the relevant chambers of the Supreme Judicial Council, whose members' terms have expired, to appoint, reassign, promote, and demote magistrates.

The draft Law establishes the legal framework for the election of the so-called "public quota" of at least four people within the parliamentary body, without limiting the powers of Members of Parliament regarding the election of eleven members of the SJC pursuant to

Article 130, paragraph 3 of the Constitution. However, for at least four of them, a special procedure for nominations is introduced i.e. a recommendation-based selection, namely: upon the proposal of the General Assembly of the country's lawyers, the Union of Jurists in Bulgaria, the Academic Council of Sofia University "St. Kliment Ohridski," and the Bulgarian Academy of Sciences, thereby ensuring that the subsequent election by Parliament is far more "public" than political or party-based.

- Draft Law Amending and Supplementing the Judicial System Act, No. 52-654-01-17, introduced by Nadezhda Georgieva Yordanova and a group of Members of Parliament on April 30, 2026.

The draft Law aims to establish safeguards against political influence in the exercise of the powers of the Supreme Judicial Council and the Inspectorate to the Supreme Judicial Council, in accordance with the recommendations of the annual Rule of Law Report prepared by the European Commission, as well as in accordance with the recommendations and standards of the Venice Commission of the Council of Europe.

Guarantees for transparency and greater public legitimacy in the selection of the Chairperson of the Supreme Court of Cassation and of the Chairperson of the Supreme Administrative Court, and the Prosecutor General are strengthened, and opportunities for violating the constitutional terms of office of senior judicial leaders are eliminated.

The three bills mentioned above are in line with the OECD's key recommendations regarding the election of members of the Supreme Judicial Council and the reduction of the de facto power of the Prosecutor General.

On 14 May 2026, the National Assembly adopted at first reading the three above described draft acts amending and supplementing the Judicial System Act submitted by different parliamentary groups, which have been subsequently consolidated into a comprehensive draft act.

Following the Constitutional amendments, the comprehensive draft amendments to the Judicial System Act represent the most substantial legislative package, aimed at implementing the recommendations under the Rule of Law Report concerning the election of a new Supreme Judicial Council (SJC), the functioning of the Inspectorate to the SJC, the limitation of the powers of bodies with expired mandates, and the strengthening of the accountability of the Prosecutor General.

Main Amendments

1. Limitation of the powers of the SJC after the expiry of its mandate

The draft provides that the SJC, respectively the Judges' College and the Prosecutors' College, where a new composition has not been elected more than one year after the expiry of their mandate, may not adopt key personnel-related decisions, including appointments, promotions and the election of administrative heads, except where strictly necessary to ensure the functioning of the judiciary.

- *This amendment is directly aimed at implementing the recommendation concerning the renewal of the composition of the SJC and limiting the risk of a body with expired democratic legitimacy exercising long-term personnel powers.*

2. New rules for the election of members of the SJC

The draft act provides for:

- participation of the Supreme Bar Council;
 - participation of law faculties;
 - participation of the Bulgarian Academy of Sciences;
 - more detailed requirements regarding professional and ethical qualities;
 - greater transparency of nominations;
 - reasoned nominations;
 - preliminary integrity checks of candidates.
- *This constitutes the most direct implementation of the European Commission's recommendation to reduce political influence in the election of the parliamentary quota of the SJC and to strengthen transparency and professional criteria in the selection process.*

3. Restrictions concerning former "three high-ranking office holders"

The draft provides that persons who within the last seven years have served as:

- President of the Supreme Court of Cassation;
 - President of the Supreme Administrative Court;
 - Prosecutor General;
 - their deputies;
 - or have performed such functions for more than six months,
- may not be elected as members of the SJC.

- *The measure aims to reduce the concentration of influence within the governing bodies of the judiciary.*

4. Amendments concerning the Inspectorate to the SJC

The draft provides for:

- expansion of the circle of entities entitled to nominate candidates;
 - participation of the general assemblies of judges, prosecutors and investigators;
 - a more detailed procedure for the nomination and vetting of candidates.
- *This is directly linked to the repeatedly reiterated recommendation of the European Commission to reduce the risk of political influence in the appointment of the Inspectorate to the SJC.*

5. Limitation of prolonged performance of functions by acting office holders

The draft introduces rules concerning:

- an Acting Prosecutor General;
 - an Acting President of the Supreme Court of Cassation;
 - an Acting President of the Supreme Administrative Court;
- including maximum duration and a new procedure for determining the persons

performing these functions.

- *The measure addresses long-standing criticism concerning the possibility for key positions to be occupied for prolonged periods by acting office holders without a regular appointment procedure being conducted.*

6. Strengthening the accountability of the Prosecutor General

The range of entities entitled to initiate a procedure for the early dismissal of the Prosecutor General is expanded. These include:

- the Minister of Justice;
- the President of the Supreme Court of Cassation;
- the Ombudsman;
- at least one fifth of the Members of Parliament;
- the Supreme Bar Council;
- at least three members of the Prosecutors' College.

- *The amendment is aimed at strengthening accountability mechanisms and reducing the de facto concentration of power within the institution of the Prosecutor General.*

On 5 June 2026, the Ministry of Justice submitted an opinion to the Temporary Committee on Legal Affairs regarding Comprehensive Draft Act No. 52-653-123-6 of 15 May

2026 amending and supplementing the Judicial System Act. In its opinion, the **Ministry supports the overall direction of the reform** of the governance of the judiciary, including the renewal of the SJC, the limitation of the powers of bodies with expired mandates, and the strengthening of transparency and integrity in the election of members of the SJC and the Inspectorate to the SJC, while at the same time **emphasising the need for the amendments to remain within the constitutional framework** and the case-law of the Constitutional Court and the Court of Justice of the European Union.

Recommendation 3 — Composition of the Supreme Judicial Council

"Re-initiate the process to reform the Supreme Judicial Council, in particular its composition, to ensure its independence and effectiveness, taking into account European standards on Councils for the Judiciary."

The Ministry of Justice considers the reform of the SJC to be essential for strengthening the independence, accountability and effectiveness of judicial governance. Following the judgment of the Constitutional Court of 26 July 2024, which preserved the unified structure of the SJC existing prior to the Constitutional amendments of December 2023, the Ministry's current approach focuses on advancing reforms within the constitutional framework as interpreted by the Court.

In this regard, the draft amendments to the Judicial System Act submitted to the 52nd National Assembly constitutes a first step in the renewed reform process.

The proposed amendments address in particular the procedures for the election of members of the SJC and the IJSC, including:

- enhanced professional assessment mechanisms;
- broader involvement of judicial bodies in the selection process;
- additional safeguards aimed at increasing transparency and public confidence in the selection process.

The Ministry considers that the renewal of the composition of the SJC and the restoration of the regular functioning of judicial governance bodies are directly linked to the effective functioning of the judiciary, including the conduct of regular appointment and promotion procedures.

At the same time, the Ministry takes note of the relevant European standards on Councils for the Judiciary, including Recommendation CM/Rec(2010)12 of the Committee of Ministers and the relevant opinions of the Venice Commission, which continue to serve as guiding standards in the ongoing reform process.

(For more detailed information on the Judicial System Act, adopted at first reading by the National Assembly on 14 May 2026, see Recommendation 2)

Additional information:

Standard for ministerial nominations to senior positions in the judiciary

In parallel with the institutional reform of the SJC, the Ministry of Justice has also developed a Standard for ministerial nominations to senior positions in the judiciary. This Standard governs the exercise of the Minister's constitutional power to propose candidates for key senior managerial positions and complements the broader reform efforts by introducing clear, objective and transparent criteria for leadership appointments. It includes a competency model defining the professional and leadership qualities expected of candidates, an assessment methodology based on objective and measurable indicators, and a competitive procedure ensuring comparability and publicity.

A working analysis of the competency model for senior administrative heads in the judiciary - covering the Prosecutor General, the Presidents of the supreme courts, the Director of the National Investigation Service and the administrative heads of the prosecutor's offices at various levels - was published by the Ministry of Justice on 9 April 2026. The analysis distinguishes for the first time between the figures of the Prosecutor General and the Presidents of the supreme courts in view of the character and concentration of power and supervisory competences inherent in each office, and articulates differentiated requirements for each level of management (strategic leadership for the Prosecutor General; institutional leadership for the Presidents of the Supreme Court of Cassation and the Supreme Administrative Court, with a focus on the consistency of judicial practice; systemic and operational management for the appellate, district and regional prosecutors). The analysis also articulates "horizontal" criteria common to all senior judicial positions, including high ethical integrity, resilience to pressure and absence of dependencies, with concrete indicators against which the Supreme Judicial Council and the public can assess the preparation of each candidate.

The publication is intended to ensure transparency and predictability in the exercise of the constitutional prerogative of the Minister and to provide a methodological framework that the regular government that will follow the constitution of the 52nd National Assembly may develop further; in the context of pending procedures for the election of administrative heads before the Supreme Judicial Council, the model is also made available to candidates and to members of the Council as a non-binding reference.

The document combines a conceptual, evaluative and procedural framework for the exercise by the Minister of Justice of his power under Art. 130v(3) of the Constitution to propose candidates for managerial positions in the judiciary. Its purpose is to transform the exercise

of this power from isolated, situational nominations into a sequential, structured and reasoned process based on pre-defined criteria, competency models and a competitive procedure.

To add concrete specificity from the conceptual framework: the standard sets out role-specific profiles for each senior office and links each profile to measurable indicators across three competency groups — ethical/value-based, professional/legal and managerial/leadership — with ethical integrity assigned the highest relative weight and unresolved integrity concerns treated as disqualifying. The assessment methodology requires documentary evidence, third-party verifications and integrity checks (including asset declarations, conflict-of-interest screening and review of disciplinary history), and it prescribes a transparent scoring system and documented motivations for each score. The competitive procedure is multi-stage and public: vacancies and selection criteria are published in advance; admissibility and formal eligibility are verified; dossiers are scored against the competency model; a dedicated integrity gate evaluates dependencies and ethical risks; candidates participate in a public hearing where they present their management concept and answer questions; an expert selection commission prepares a comparative analytical report and scoring matrix; and the Minister submits a fully motivated proposal to the Supreme Judicial Council. The selection commission is defined as an expert fact-finding body whose comparative report is intended to inform, but not replace, the Minister's independent initiative or the Council's appointment competence. Procedural safeguards embedded in the standard include mandatory conflict-of-interest declarations, plurality and independence of evaluators, publication of procedural rules and evaluation criteria, traceability of scores and motivations, and mechanisms for public scrutiny, all designed to reduce the risk of arbitrary or politically motivated nominations while preserving the constitutional balance between executive initiative and judicial self-governance.

The framework distinguishes leadership profiles according to the character and concentration of powers inherent in each office: strategic leadership for the Prosecutor General, institutional leadership for the Presidents of the supreme courts with emphasis on harmonisation of judicial practice, and systemic and operational leadership for appellate, district and regional prosecutors. Horizontal criteria common to all senior posts include high ethical integrity, resilience to pressure, absence of dependencies and demonstrable legal and managerial expertise; the framework links each such criterion to concrete, verifiable indicators that the Supreme Judicial Council and the public may use to assess candidate preparedness. The Ministry presents the model as a non-binding methodological reference for candidates and for members of the Supreme Judicial Council, intended both to inform immediate pending election procedures and to serve as a baseline for iterative refinement by the incoming regular government, with further adjustments expected through practice, stakeholder feedback and alignment with European standards on judicial independence and

good governance.

The full strategic framework for nominating senior judicial leaders was published on 4 May on the official website of the Ministry of Justice <https://justice.government.bg/home/index/452107fc-d1ef-4569-b101-4b3b4d4fe77e>.

/please see at Annex 1 the document machine translated in English/

Recommendation 4 — High-level corruption cases and the Anti-Corruption Commission

"Ensure 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."

Effective performance of the Anti-Corruption Commission

On 29 May 2026, the National Assembly adopted at second reading the Act on Counteracting Corruption among Persons Holding Public Office. The Act was promulgated in State Gazette No. 51 of 5 June 2026 and entered into force on the day of its promulgation. The adoption and entry into force of the Act represents a key development in strengthening Bulgaria's institutional framework for the prevention, detection and investigation of corruption involving persons holding public office.

The Act establishes a new independent specialised permanent state body — the Commission for Counteracting Corruption — responsible for the prevention and counteraction of corruption among persons holding public office. The Act covers measures concerning corruption prevention, verification of discrepancies in declared assets, establishment of conflicts of interest, the status and functions of the Commission, and cooperation with other state bodies and international partners.

The scope of the Act is broad and covers high-level public office holders, including the President and Vice-President, Members of Parliament, the Prime Minister, Deputy Prime Ministers, ministers and deputy ministers, senior judicial office holders, members of independent authorities, senior officials in the executive branch and other persons exercising public functions. This ensures that the new anti-corruption framework applies to the highest levels of public authority, including both political and administrative decision-makers.

The new Commission has powers to carry out preventive activities, to perform actions for detection and investigation of corruption related crimes, to control and decide on checks and analyses of asset and interest declarations, to establish conflict of interest, to examine signals for incompatibility in declarations and to refer for further action identifies incompatibilities to the competent appointing or electing authority. The Commission is also empowered to appeal refusals to initiate pre-trial proceedings under the Criminal Procedure Code and to create, administer, maintain and upgrade a unified system for electronic declarations.

The Act introduces specific safeguards for the operational independence of investigating inspectors. Investigating inspectors of the Commission carry out investigations in the cases, under the conditions and in accordance with the procedure laid down in the Criminal Procedure Code. They may not be assigned activities other than the investigation of offences. In the exercise of their powers, they act according to their inner conviction, based on an objective, comprehensive and complete examination of all circumstances of the case and guided by the law. Superior officials are expressly prohibited from giving instructions on investigative actions, on the preparation of written opinions, or otherwise interfering in investigations. The allocation of pre-trial proceedings is carried out by random electronic distribution.

The Act also establishes a pluralistic appointment model for the Commission. The Commission consists of five members: one elected by the National Assembly, one appointed by the President of the Republic, one elected by the General Assembly of judges of the Supreme Court of Cassation, one elected by the General Assembly of judges of the Supreme Administrative Court, and one elected by the Supreme Bar Council. The Commission is chaired on a rotating basis for one year, with the chairperson determined by a draw. This model is aimed at reducing the risk of concentration of influence over the anti-corruption body and strengthening its institutional independence.

The appointment procedures include transparency and integrity safeguards. The nominations are public. Candidates are required to submit professional biographies, documents proving eligibility, declarations of incompatibility and declarations of assets and interests. Public hearings are held, while civil society organisations, the Supreme Bar Council, universities, research organisations and media may submit opinions and questions.

Motivated reports on the professional and ethical qualities of candidates are prepared and published. These guarantees are designed to strengthen transparency, integrity and public scrutiny in the constitution of the Commission.

The transitional provisions regulate the transfer from the previous institutional framework to the new Commission. Within three months from taking office of the chairperson and members of the Commission, activities related to the counteraction, detection, investigation and prevention of corruption offences, checks and analyses of asset and interest declarations and the establishment of conflicts of interest continue to be carried out under the existing procedure by the competent authorities. After that period, pending pre-trial proceedings concerning corruption offences under the Act are to be forwarded to the supervising prosecutor, who assigns them to the competent investigating authority under the Criminal Procedure Code. This aims to ensure continuity of ongoing proceedings while allowing the new institutional model to become fully operational.

The Act provides the possibility for the body to begin functioning after the election of at least three of its five members, with a view to avoiding institutional blockage. The bill further preserves the operational and investigative powers of the Commission on corruption crimes, while providing safeguards aimed at ensuring transparency, accountability and political independence.

Report on the Activities of the Prosecution Office of the Republic of Bulgaria

The institutional framework is further complemented by the reporting obligations under Article 138a of the Judicial System Act, pursuant to which the Prosecutor General annually submits information regarding investigations, indictments and judicial proceedings concerning corruption offences. This reporting mechanism contributes to transparency, public accountability and institutional oversight of the handling of corruption cases and supports the monitoring of Bulgaria's track record in the investigation and prosecution of corruption offences involving persons holding public office.

According to the 2025 Annual Report submitted by the Prosecutor General pursuant to Article 138a of the Judicial System Act, during 2025 the prosecution service monitored 2 446 pre-trial proceedings concerning corruption offences, including 662 newly initiated proceedings. Prosecutors resolved 1 104 proceedings and submitted 211 prosecutorial acts

to the courts concerning 262 persons. A total of 156 persons were convicted or sanctioned by final judicial act, while 23 persons were acquitted.

The report also contains detailed statistical information concerning bribery offences, abuse of office and corruption-related document offences, as well as proceedings for offences of particular public interest. In particular, during 2025, 88 pre-trial proceedings concerning bribery offences were initiated, 58 prosecutorial acts were submitted to the courts and 52 persons were convicted by final judicial act, with no acquitted persons for such offences recorded during the reporting period.

The report further notes that specialised structures within the Prosecutor's Office continue to operate in the area of corruption offences and that a specialised interinstitutional unit of representatives of the Prosecutor's Office and the Ministry of Interior carries out regular monitoring and analysis of proceedings related to organised crime and offences of particular public interest, including corruption offences.

A link to the full text of the Annual Report of the Prosecutor General submitted pursuant to Article 138a of the Judicial System Act is provided for reference - https://prb.bg/bg/pub_info/dokladi-i-analizi/.

Swiss–Bulgarian Cooperation Programme

In addition, under the Swiss–Bulgarian Cooperation Programme, Activity 1.3 provides analytical and technical support to the Ministry of Justice and the National Council on Anti-Corruption Policies. The activity includes a targeted analysis of conflict-of-interest legislation in light of Article 61 of the EU Financial Regulation and the Commission's Guidelines. The analysis (January 2026 – June 2028) will conclude with a final compliance report, supporting the implementation and sustainability of Milestone 226a.

The Center for the Study of Democracy (CSD) has prepared a first draft of the analytical report for the Ministry of Justice, currently comprising approximately 100 pages, concerning the definition and regulation of conflicts of interest under national legislation and recommendations for possible improvements. The draft includes: (1) an overview of the EU legal framework, including an analysis of the relevant provisions of Regulation (EU) 2024/2509, comparison with the previous framework under Regulation (EU) 2018/1046, review of the European Commission Guidelines on the avoidance and management of

conflicts of interest, and examination of the relationship between Article 61 of the Financial Regulation and the relevant sectoral regulations; (2) an analysis of the national legal framework governing conflicts of interest in the management of EU funds, including the Law on the Management of European Funds under Shared Management, secondary legislation, the Anti-Corruption Act, the Public Procurement Act and related legislation; (3) an assessment of the institutional and procedural framework for the management of EU funds, including the role and responsibilities of competent authorities, committees, evaluation bodies and control mechanisms; (4) a detailed assessment of the compliance of the Bulgarian legal framework with the requirements of Regulation (EU) 2024/2509, covering the personal scope of the rules, actual and perceived conflicts of interest, direct and indirect conflicts, non-financial interests, preventive obligations and procedural safeguards; and (5) concluding findings and preliminary recommendations aimed at addressing identified gaps and strengthening alignment with EU requirements. The draft is currently undergoing internal review and refinement prior to submission, and the final analyses are expected to be completed by 15 June 2026.

Tools for Combating Corruption and Promoting Integrity

Strengthened integrity framework across the public sector, building on the amendments to the Public Enterprises Act was adopted by the National Assembly in November 2025. In accordance with the three-month deadline set out in §5 of the Transitional and Final Provisions, the Agency for Public Enterprises and Control (APEC) completed all legally required actions.

Recommendation 5 — Integrity of top executive functions

"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."

Integrity framework and institutional safeguards

The Act on Counteracting Corruption among Persons Holding Public Office, promulgated in State Gazette No. 51 of 5 June 2026, introduces a strengthened integrity framework applicable to persons holding top executive functions and other senior public offices.

The Act expressly applies to the Prime Minister, Deputy Prime Ministers, ministers and deputy ministers. It also covers the heads of political cabinets, chief and administrative secretaries in the executive branch, regional governors and deputy regional governors, heads and deputy heads of state agencies, executive agencies and state institutions established by law or by act of the Council of Ministers, as well as a broad range of senior officials exercising public authority. This significantly expands and clarifies the personal scope of the integrity framework and ensures that both political office holders and senior officials in their immediate political and administrative environment are subject to anti-corruption, incompatibility, declaration and conflict-of-interest rules.

The inclusion of heads of political cabinets is particularly relevant to the integrity of top executive functions. Political cabinets play an important role in supporting ministers and other executive authorities in policy-making, coordination and political decision-making. By expressly including heads of political cabinets among the persons holding public office under the Act, the new framework ensures that persons with direct access to and influence over high-level executive decision-making are subject to the same integrity obligations and oversight mechanisms as other senior public officials.

Persons under by the Act are required to submit declarations of incompatibility and declarations of assets and interests, including changes in declared circumstances. Declarations of incompatibility are submitted to the electing or appointing authority, while declarations of assets and interests are submitted to the Commission. Where a person declares an incompatibility, he or she must take the necessary steps to remove it within one month and provide evidence to the competent authority. If the incompatibility is not removed within that period, the electing or appointing authority must take action to terminate the legal relationship.

The Commission is competent to control and decide on checks and analyses of declarations of assets and interests, to establish conflicts of interest, to hear or request information in conflict-of-interest proceedings, and to examine signals concerning declarations of incompatibility. Where an incompatibility is established, the Commission refers the matter to the competent electing or appointing authority for the necessary follow-up action.

The Act also provides for a mechanism for reporting corruption and conflicts of interest. Any person who has information concerning corruption or a conflict of interest involving a person holding public office may submit a signal to the Commission. Signals are registered immediately, examined in accordance with the statutory principles and, where outside the Commission's competence, forwarded to the competent authority. Media publications may also be treated as signals where they meet the statutory requirements.

The sanctioning and accountability framework is strengthened through procedures for establishing conflicts of interest and related consequences. Decisions of the Commission establishing a conflict of interest may impose administrative sanctions and, where applicable, provide for confiscation of benefits. Such decisions are communicated to the person concerned, to the authority competent to terminate the legal relationship and to the competent district prosecutor's office. The decisions may be challenged before the court under the Administrative Procedure Code, while the prosecutor may challenge decisions finding no conflict of interest. Where evidence of a criminal offence is established, the materials are sent immediately to the prosecution service.

These measures contribute to the implementation of the recommendation by introducing clearer integrity obligations, broader personal coverage, institutional oversight, enforceable consequences and judicial review mechanisms for persons exercising top executive functions and those in their immediate political environment.

Additional institutional developments:

The opening on 27 April 2026 by the Sofia City Prosecutor's Office of pre-trial proceedings under Article 283 of the Criminal Code in connection with the publicly reported allegations concerning the recent leadership of the Supreme Administrative Court further illustrate the relevance for the integrity verification of candidates for senior judicial office that the fast-track Judiciary Act bill described in is designed to introduce.

The allegations of pressure directed at the acting Secretary-General of the Ministry of the Interior, Mr Kandev, made public on 24 April 2026 engage the resilience of the institutional environment of the rule of law to informal channels of influence at the senior level of the law-enforcement administration.

Both matters fall under the lead competence of the Sofia City Prosecutor's Office, the Ministry of the Interior and (in respect of magistrates) the Supreme Judicial Council, and the Ministry of Justice does not pre-empt their substantive findings. In addition, the Mechanism for the institutional protection of magistrates, through its public register of cases at high risk of pressure populated on the basis of objective criteria, complements the asset-declaration verification machinery referenced above by providing a structured response to the operational manifestations of undue interference with the performance of public functions.

In this context, it is also relevant to note the action taken by the Minister of Justice on 15 April 2026, whereby an inspection was commissioned at the Directorate-General for Security (DGO) concerning the employment status of the Deputy Director-General of DGO, Mr Deyan Dimitrov. The inspection was initiated in connection with information disseminated in the public domain through a journalistic investigation and aims to establish whether the DGO holds data relating to the publicly known circumstances, as well as whether there is any

conduct incompatible with the requirements of the Code of Ethics for Civil Servants within the DGO system. By order of the Minister of Justice, the inspection has been entrusted to the Inspectorate under Article 46 of the Act on the Administration.

In parallel, the Minister of Justice has sent a request to the Sofia City Prosecutor's Office for information regarding the road traffic accident referred to in the journalistic investigation, with a view to clarifying the conduct of the DGO official. The Sofia City Prosecutor's Office has also been asked whether there may have been an infringement of the internal rules on the allocation of files within the prosecution service, in light of the alleged replacement of the supervising prosecutor reported in the media publication.

These actions form part of the broader efforts to strengthen the integrity of senior public functions and illustrate the need for effective institutional mechanisms to address potential undue influence or conflicts of interest within the executive and law-enforcement systems.

Recommendation 6 — Transparency in the allocation of state advertising

"Complete the work aimed at improving transparency in the allocation of state advertising, in particular with regard to state advertising contracted through intermediaries, such as media agencies."

Transparency framework and institutional coordination

Measures concerning transparency in the allocation of state advertising continued to be discussed in the broader context of media independence, public procurement transparency and safeguards against undue influence in the distribution of public funding.

Ongoing institutional measures continued to address transparency, accountability and integrity in public contracting and in the relations between public authorities and the media sector.

The implementation of the Transparency in Interest Representation Act and the establishment of the Transparency Register form part of the broader transparency framework relevant to the allocation of public resources and the visibility of interactions between public authorities, intermediaries and media actors.

Ongoing reforms concerning the integrity of public officials, the strengthening of accountability mechanisms and the recently adopted legislative amendments concerning judicial review of prosecutorial decisions in corruption-related proceedings contribute indirectly to improving the institutional environment in which decisions concerning public contracting and state-funded communication are taken.

In parallel, work continued on the transposition of Directive (EU) 2024/1069 on protecting persons who engage in public participation from manifestly unfounded claims or

abusive court proceedings (“Anti-SLAPP Directive”). Draft amendments to the Civil Procedure Code aimed at introducing procedural safeguards against abusive litigation targeting journalists, media actors, civil-society organisations and persons participating in public debate were published for public consultation. The strengthening of procedural safeguards for freedom of expression, media pluralism and public participation contributes to the broader transparency and media-freedom environment relevant to the present recommendation.

Recent developments and media-related considerations

During the recent period, public and parliamentary discussions concerning transparency in the allocation of public resources have continued in the broader context of media independence, public procurement transparency and safeguards against undue influence in the distribution of state funding.

The implementation of the European Media Freedom Act is expected to provide an additional framework concerning transparency, editorial independence and safeguards relating to the funding of public-service media.

In parallel, the interinstitutional working group established in relation to the implementation of the European Media Freedom Act and the preparation of amendments to the Radio and Television Act continues its work. The working group has reached agreement on certain individual provisions, while discussions on the broader legislative framework remain ongoing. The composition of the working group is currently being updated with a view to resuming its activities and continuing the preparation of the draft amendments to the Radio and Television Act.

Continued institutional coordination between the competent authorities remains important in order to ensure coherence between public procurement rules, transparency requirements, anti-corruption safeguards, media-freedom standards and the broader rule-of-law framework applicable to the allocation of state advertising and media-related public funding.

Recommendation 7 — Quality of the legislative process

"Strengthen the quality of the legislative process by ensuring the use of public consultations and impact assessments for legislative initiatives by Parliament."

Public consultations and impact-assessment framework

The procedures under Article 26 of the Normative Acts Law concerning public consultations, as well as the inter-ministerial coordination mechanisms under Articles 32 and 35 of the Rules of Procedure of the Council of Ministers and its Administration, continued to be applied in the preparation of draft legislation. Draft legislative acts submitted by the

Council of Ministers were published on the Public Consultations Portal of the Republic of Bulgaria together with the relevant explanatory memoranda and impact-assessment documents.

Preliminary impact assessments continued to be prepared for legislative initiatives with significant institutional or societal impact, including in the areas of anti-corruption policy, judicial reform, criminal-procedure legislation and media-related legislation.

During the reporting period, public-consultation procedures have been conducted on draft anti-corruption legislation, the draft Anti-SLAPP amendments to the Civil Procedure Code, draft amendments to the Criminal Procedure Code concerning judicial-review mechanisms in corruption-related proceedings, as well as legislative initiatives related to transparency in interest representation.

In a number of legislative procedures, consultations involved representatives of the judiciary, academic institutions, professional organisations, civil-society organisations, international partners and other stakeholders. The continued use of public consultations, working groups, expert consultations and interinstitutional coordination mechanisms contributes to improving transparency, predictability and stakeholder participation throughout the legislative process.

Public consultations on to the draft Transparency in Interest Representation Act (“Lobbying Transparency Act”) have also been carried out during which comments and opinions were submitted by representatives of civil-society organisations, professional organisations, international partners and other stakeholders. The discussions concerned, inter alia, the scope of the regulation, the treatment of advocacy activities carried out by non-governmental organisations and the applicable registration requirements. A number of comments and proposals submitted during the consultation process have been discussed within the working group and reflected in the subsequently adopted legislative framework.

Parliamentary legislative process and recent developments

The recommendation also concerns legislative initiatives introduced directly by Members of the National Assembly, including parliamentary procedures relating to public consultations, transparency and impact assessments applicable to bills introduced by Members of Parliament.

During the reporting period, several legislative initiatives concerning judicial reform and anti-corruption policy introduced by Members of Parliament have been subsequently consolidated into comprehensive draft acts following parliamentary discussions and committee procedures. The consolidation of overlapping legislative proposals and the conduct of discussions within parliamentary committees contributed to improving legislative coherence and transparency in the respective reform areas.

The Rules of Organisation and Procedure of the 52nd National Assembly, promulgated in State Gazette No. 50 of 2 June 2026, introduced additional procedural safeguards and arrangements concerning the organisation and functioning of parliamentary committees, the publication of committee agendas and reports, the conduct of public hearings and discussions, as well as broader opportunities for stakeholder participation in parliamentary proceedings. The Rules further strengthened transparency requirements concerning the publication of committee proceedings and public access to parliamentary information. Specific provisions also provide for the participation of representatives of civil-society organisations and professional organisations in committee discussions and for the publication of written opinions and committee materials on the website of the National Assembly. The Rules additionally envisage the possibility for parliamentary committees to carry out ex post impact assessments of legislation and strengthen mechanisms for public consultations and interaction with civil society. These developments contribute to improving the organisation, predictability and transparency of the parliamentary legislative process and remain relevant to the implementation of the present recommendation.

Improving the quality of the legislative process requires not only compliance with formal procedural requirements, but also the consistent application of sustainable institutional practices ensuring transparency, predictability, professional expertise and meaningful stakeholder participation throughout the legislative cycle.

INFORMATION ON THE PROGRESS OF REFORMS IN THE JUSTICE AND ANTI-CORRUPTION SECTOR, INCLUDING DEVELOPMENTS RELATED TO THE RULE OF LAW AND ON THE IMPLEMENTATION OF COMMITMENTS UNDER THE RECOVERY AND RESILIENCE PLAN 8 JUNE
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- **Anti-Corruption Commission (M218):** As the milestone is assessed by the European Commission as not completed, and an amount of EUR 214,544,232 from the second payment has been suspended, Bulgaria has undertaken further steps to ensure its successful fulfilment. Following the consultation process, the Draft Law was adopted by the Council of Ministers and submitted to the National Assembly on 30 April 2026. The draft reflects the active dialogue with the European Commission and includes detailed provisions on the appointment of the members of the Anti-Corruption Commission, the eligibility requirements they must fulfil, and the nomination and election procedure. The new anti-corruption body should concentrate solely on those powers that directly relate to the prevention and combating of corruption offenses. These steps aim to address the Commission's assessment and ensure the full and timely completion of Milestone 218. On 29 May 2026, the National Assembly adopted at second reading the Act on Counteracting Corruption among Persons Holding Public Office. The Act was promulgated in State Gazette No. 51 of 5 June 2026 and entered into force on the day of its promulgation. The adoption and entry into force of the Act represents a key development in strengthening Bulgaria's institutional framework for the prevention, detection and investigation of corruption involving persons holding public office. (more information see in Recommendation 4)

- **Entry into force of legal act(s) concerning the criminal proceedings and the accountability and criminal liability of the Prosecutor General (M222):** A Draft Law for amending the Criminal Procedure Code has been drafted by the Ministry of Justice in order to meet the verification mechanisms of the milestone which have been evaluated by the European Commission as not completed during the assessment of the third payment: **namely element 1.3.** *(the right of the victim to request the acceleration of the investigation if more than one year has elapsed since the initiation of the investigation and there is no person who is accused); element 2.3.* *(granting the right to request judicial review of prosecutorial acts for the termination or suspension of investigations, for a list of criminal offences committed by persons under Article 6(1) of the Anti-corruption law, to: (i) the state*

*body who submitted the signal to report the crime under investigation, as well as (ii) the Anti-Corruption Commission, the Unlawfully Acquired Assets Forfeiture Commission, the Agency for State Financial Inspection and the Court of Auditors, even if the investigation did not originate from their signal) and **element 3.4.** (limiting the oversight of the Prosecutor's Office over the prosecutorial acts of investigation of the Prosecutor General or their deputies by appointing a judge of the Supreme Court of Cassation as a prosecutor exercising control over the actions of the prosecutor who investigates the Prosecutor General of their deputies). An amount of EUR 109 211 783 is suspended for milestone 222.*

The provisions of the Draft Law include an automatic judicial review of order to suspend or terminate criminal proceedings for corruption crimes. Following the adoption of the Amendments to the Criminal Procedure Code (State Gazette No. 48 of 2023), a gap was identified in the Criminal Procedure Code regarding the provision of Article 411e, which contains a reference to the rules of a non-existent provision of Article 243a of the Penal Procedure Code. Article 411e of the Penal Procedure Code specifies the special rules for revoking a ruling to terminate criminal proceedings for the investigation of crimes committed by the Chief Prosecutor, which has not been appealed before a court. This provision is part of the mechanism for accountability of the Chief Prosecutor. This circumstance necessitates a clarification of the legal framework in Chapter Thirty-One "a" of the Code of Criminal Procedure.

With the adoption of the Law on Counteracting Corruption among Persons Holding Public Office (promulgated in the State Gazette No. 51 of 5 June 2026 <https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=243854>), substantial amendments to the Criminal Procedure Code (CPC) were introduced through its Transitional and Final Provisions. These amendments play a key role in fulfilling the previously unimplemented elements of Milestone 222 "Judicial reform measures", for which the European Commission had suspended funding amounting to EUR 109,211,783. The adopted amendments fully implement all elements of M222 that were assessed as unfulfilled at the time of the third payment request.

First, the legislator introduced mechanisms ensuring the acceleration of investigations in cases where more than one year has passed since their initiation without any person being charged. This requirement, contained in element 1.3 of M222, had been assessed as unfulfilled during the third payment. The new CPC provisions establish a

comprehensive system of judicial review over prosecutorial refusals to open pre-trial proceedings, as well as over decisions to discontinue or suspend investigations. For example, the new Article 213b provides the Anticorruption Commission with the right to challenge a prosecutor's refusal, with the court ruling on its legality and substantiation. Similar mechanisms are introduced for decisions to discontinue (Article 243a) and suspend (Article 244a) investigations. In this way, a genuine possibility for external oversight is created, preventing unjustified delays in criminal proceedings.

Second, the Transitional and Final Provisions implement the requirements of element 2.3, related to the right of certain state bodies to request judicial review of prosecutorial acts. The new provisions ensure that the Anti Corruption Commission, as well as other bodies listed in the anti corruption law, may refer the matter to the court in cases of refusal, discontinuation, or suspension of investigations concerning offences committed by persons under Article 5(1) of the law. This is evident from several amendments, including the new Articles 213b, 243a and 244a, which explicitly require that prosecutorial decisions be transmitted to the competent court and grant the affected institutions the right to participate in the proceedings. Thus, transparency and accountability of prosecutorial acts in sensitive corruption cases are strengthened.

Third, through amendments to Article 411g and the introduction of the new Article 411d, element 3.4 of M222 is fulfilled, requiring the limitation of prosecutorial oversight over investigations involving the Prosecutor General. The new provisions introduce mandatory judicial review of the acts of the prosecutor investigating the Prosecutor General, including decisions to discontinue or suspend proceedings. The court rules on the legality and substantiation of such acts and, when annulling them, issues binding instructions on the application of the law. This represents a qualitatively new safeguard for the independence and effectiveness of investigations against the Prosecutor General and his or her deputies.

Mechanism for investigating the Prosecutor General and his/her deputies

In parallel with the new anti-corruption framework, recent legislative developments further strengthen the institutional guarantees surrounding the mechanism for investigating the Prosecutor General and his/her deputies.

The Act on Counteracting Corruption among Persons Holding Public Office (on 29 May 202 adopted at second reading from National Assembly) includes amendments to the

Judicial System Act aimed at operationalising the mechanism. The amendments provide that the General Assembly of the Criminal Chamber of the Supreme Court of Cassation approves a list of sitting judges from the Criminal Chamber of the Supreme Court of Cassation. Where necessary, a case under Article 411g of the Criminal Procedure Code is randomly allocated from among the judges included in that list.

The transitional provisions introduce concrete implementation deadlines. Within 14 days of the entry into force of the Act, the General Assembly of the Criminal Chamber of the Supreme Court of Cassation must approve the list under Article 112(7) of the Judicial System Act. Within one month after the expiry of that 14-day period, a judge is to be designated under Article 112(7) of the Judicial System Act and appointed to perform the functions of Deputy Prosecutor General for the purposes of supervising the actions of the prosecutor investigating offences committed by the Prosecutor General, under the conditions and procedure set out in Article 173a(4) of the Judicial System Act.

This development is significant because it moves the mechanism beyond a general legal framework and establishes an operational procedure with concrete deadlines, random selection and institutional involvement of the Supreme Court of Cassation. It also strengthens the safeguards for independence by ensuring that oversight over the prosecutor investigating the Prosecutor General is exercised by a judge from the Criminal Chamber of the Supreme Court of Cassation selected through a predefined and randomised procedure.

As a result, the Transitional and Final Provisions of the anti corruption law introduce precisely the mechanisms identified by the European Commission as missing: acceleration of investigations, expansion of judicial review over prosecutorial acts, and limitation of prosecutorial influence in investigations involving the Prosecutor General. In this way, all elements of M222 are fulfilled, establishing a stable legal framework for more effective anti corruption efforts and for strengthening the Rule of law#.

- **Legislative Measures Regulating Lobbying Activities (RRP223)**

The Law on Transparency in Interest Representation was adopted by the 51st National Assembly on 19 March 2026 and promulgated in State Gazette No. 30 of 27 March 2026. The measure introduces a comprehensive framework for lobbying transparency,

including registration, reporting obligations and oversight mechanisms. The milestone is considered completed for the purposes of the fourth payment request.

During the drafting process of the Lobbying Transparency Act, a central issue concerned the extent to which non-governmental organisations (NGOs) should fall within the scope of lobbying regulation. The initial Concept excluded public-benefit NGOs engaged in advocacy, defining such activities as non-lobbying. As noted in the preparatory documents, advocacy by NGOs registered in the public interest was considered distinct from lobbying and was to be reported only through annual activity reports.

Both the OECD and the European Commission, however, considered this exemption too broad and inconsistent with international standards. The OECD recommended removing the exclusion of NGOs altogether, while the European Commission warned that the broad exemption for advocacy could lead to legal uncertainty and potential misuse. Civil society organisations expressed concerns regarding an early draft provision that treated any public communication aimed at influencing public opinion as interest representation, arguing that such wording could restrict freedom of expression. As a result, the working group agreed to revise the text.

A key debate also focused on the criteria for mandatory registration. The draft proposed that entities must register if they conduct interest representation “regularly as an occupation” or “for remuneration”. NGOs argued that registration should apply only to professional lobbyists. To avoid capturing occasional advocacy, the working group clarified that multiple communications addressed to several officials count as a single contact, and repeated follow-ups on the same issue also count as one contact.

In line with these discussions and the final legislative approach, **all NGOs seeking to influence decision-making are required to register as lobbyists unless they fall within one of the fourteen exceptions under Article 13(3) of the Act.** This reflects the balanced model sought by the working group: ensuring transparency and equal access while safeguarding legitimate public-interest advocacy.

On 19 March 2026, the Lobbying Transparency Act was adopted by the National Assembly at second reading and was promulgated in State Gazette No. 30 of 27 March 2026. The Act fulfils the commitment undertaken in the context of Bulgaria's accession process to the OECD on alignment with the OECD Recommendation of the Council on Transparency and Integrity in Lobbying and Influence (OECD/LEGAL/0379, originally adopted on 18 February

2010 and revised on 3 May 2024), as well as Milestone 223 of the National Recovery and Resilience Plan (Pillar "Fair Bulgaria", Component "Business Environment"). The Act establishes a Transparency Register and clear rules of accountability with a view to ensuring transparency in contacts with the representatives of public authority and equal access for all interested natural and legal persons engaging in interest representation. By Order No. LS-13-39 of 25 March 2026 of the Minister of Justice, a working group was established to draft the implementing ordinance under Article 19(3) of the Act. The working group is meeting weekly.

The Transparency Register to be established and maintained by the National Audit Office. The procedure for registration, deletion and certification of facts and circumstances in the Register is to be provided for in an ordinance issued by the Minister of Justice, in coordination with the President of the National Audit Office and the Minister of Electronic Government. This ordinance must be adopted within three months of the entry into force of the Lobbying Transparency Act.

At present, an inter-institutional working group has been established within the Ministry of Justice, with representatives of the National Audit Office and the Ministry of Electronic Government (currently the Ministry of Innovation and Digital Transformation), tasked with preparing the draft ordinance for the Transparency Register.

The deadline for adopting the ordinance on the Transparency Register is 30 June 2026.