

Annual Rule of Law Report - Council of Europe contribution

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

2026

Directorate General Human Rights and Rule of Law (DG I)

Bulgaria

I Justice System

PACE

Monitoring committee [Doc. 16316](#)

Although the Monitoring Committee's proposed to close the post-monitoring dialogue with Bulgaria already in its report of 6 March 2024, due to two rounds of early parliamentary elections in the country, the Assembly took such a decision only on 1 October 2025 by [Resolution 2620 \(2025\)](#), on the basis of an updated committee report of 9 September 2025.

The committee's report focused on six outstanding areas of concerns: reform of the judiciary, high-level corruption, transparency of media ownership, human rights of minorities, hate speech and violence against women.

The committee noted that significant constitutional and legislative reforms were undertaken to address long-standing concerns regarding the governance of the judiciary and prosecution service. Regrettably, the majority of constitutional amendments adopted in December 2023 were declared unconstitutional by the Constitutional Court on 26 July 2024, citing procedural requirements, which stalled further reform efforts. Nonetheless, reforms to the Criminal Procedure Code and laws limiting the powers of the Prosecutor's Office were upheld, aligning with recommendations from the Venice Commission and reinforcing mechanisms for accountability and criminal liability within the legal system.

Over 90 leading judgments of the European Court of Human Rights concerning Bulgaria are pending implementation, with around one third of them pending for at least 10 years. The Committee of Ministers, which supervises execution of the Court judgments, still expects tangible progress in the execution of some of them.

The committee concluded that Bulgaria had made significant progress in the honouring of its accession commitments and obligations stemming from membership in the Council of Europe since it joined the Organisation in 1992. Despite the notable instability of its political landscape between 2021 and 2024, with seven consecutive early parliamentary elections, Bulgaria established a coalition government in January 2025, demonstrating renewed political will to honor its international commitments. Moreover, following the decisions of the relevant European Union institutions of June and July 2025, it has been decided that Bulgaria will join the Eurozone as of 1 January 2026.

Therefore, in its [Resolution 2620 \(2025\)](#), the Assembly decided to close the post-monitoring dialogue with Bulgaria and follow the developments in the country with regard to the rule of law, pluralist democracy and human rights in the framework of its periodic reviews. It also called on the Bulgarian authorities to resume the reform of the organisation of the State (which was stopped following the ruling of the Constitutional Court of 26 July 2024), through the adoption of ordinary legislation and/or new constitutional amendments by the Grand National Assembly. It also invited the authorities to address other outstanding issues in close co-operation with relevant Council of Europe bodies.

CEPEJ

The European Commission for the Efficiency of Justice (CEPEJ) regularly collects data on judicial systems concerning efficiency and quality of the justice system. In the framework of the CEPEJ Study for the EU Justice Scoreboard, CEPEJ prepares Country profiles annually, including [Bulgaria](#).

The 2024 data have been collected, quality checked and sent to DG-JUST in the framework of the 2026 EU Justice Scoreboard. The publication of the country profiles based on 2024 data will depend on final acceptance of the CEPEJ Study by DG-JUST. The CEPEJ Secretariat (christel.schurrer@coe.int) remains at the disposal of European Commission for any question related to these data.

EXECUTION OF JUDGMENTS OF THE EUROPEAN COURT OF HUMAN RIGHTS

Official statistics on the execution of judgments of the European Court of Human Rights are published in the Committee of Ministers [Annual reports on the execution](#) (next edition to be published in March 2025). The Department for the Execution of Judgments can be consulted for any question on statistics: DGI-Execution@coe.int.

Irremovability of judges; including transfers, dismissal and retirement regime of judges, court presidents and prosecutors

[Miroslava Todorova](#) (40072/13) (*enhanced supervision*): Disciplinary proceedings and sanctions against the President of the judges' association in retaliation against her criticism of the Supreme Judicial Council and the executive. The European Court considered that the disciplinary proceedings and the disproportionately severe sanctions imposed on the applicant, which were directly linked to her critical public statements, had amounted to an interference in the exercise of the right to freedom of expression which had not been "necessary in a democratic society" (violation of Article 10 of the Convention). The Court further held that the predominant purpose of the disciplinary proceedings and sanctions had been to penalise and intimidate the applicant on account of her criticism (violation of Article 18 taken together with Article 10).

Latest decisions: [CM/Del/Dec\(2025\)1531/H46-12](#)

Latest submissions: [DH-DD\(2025\)337](#)

Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal liability of judges

[Kolevi](#) (1108/02) (*enhanced supervision*) case relates primarily to the ineffectiveness of the investigation into the murder of the first applicant (a high-ranking prosecutor) committed in 2002, owing to the lack of guarantees in Bulgarian law for the independence of criminal investigations concerning the Chief Prosecutor (who was suspected by the relatives of the first applicant to be implicated in the murder) and "high-ranking officials close to him" (procedural violation of Article 2).

Latest relevant decisions: [CM/Del/Dec\(2025\)1545/H46-13](#)

Latest submissions: [DH-DD\(2025\)326](#)

Accessibility of courts (e.g., court fees, legal aid, language)

[Stanev](#) (36760/06) (*enhanced supervision*): placement of a person subject to a partial guardianship order following a diagnosis of schizophrenia, in a social care home. The Court found violations because of, *inter alia*,

the lack of any judicial remedy to challenge the lawfulness of the placement or to claim compensation (violations of Article 5 §§ 4 and 5), lack of domestic remedy to challenge the inhuman and degrading conditions of the placement in the social home or to obtain compensation (violation Article 13 in conjunction with Article 3), and the impossibility for a person placed under partial guardianship to directly file a request for judicial revocation of his guardianship, in breach of his right of access to a court (violation of Article 6 § 1).

Latest decisions: [CM/Del/Dec\(2024\)1492/H46-6](#)

Latest submissions: [DH-DD\(2024\)1111](#)

The case is scheduled for examination by the Committee of Ministers in March 2026 –[CM/Del/Dec\(2025\)1545-app1](#) - Consolidated indicative list of cases for the 1553rd meeting (March 2026) (DH) adopted at the 1545th meeting - Appendix 1

[International Bank of Commerce and Development Ad and Others \(enhanced supervision\)](#) group of cases concerns mainly the lack of possibility for the applicant banks to seek and obtain proper judicial review of a decision to withdraw their banking licences and lack of proper representation in the context of insolvency proceedings, as well as the infringement of the right to property in the case of International Bank for Commerce and Development AD and Others on account of decisions of the prosecuting authorities of June 2004 affecting the management of this bank, which were not surrounded by sufficient safeguards against arbitrariness.

Latest decisions: [CM/Del/Dec\(2025\)1521/H46-8](#)

Latest submissions: [DH-DD\(2025\)1133](#)

[S.Z. \(29263/12\); Z. \(39257/17\) \(enhanced supervision\)](#): The group S.Z., which includes also the cases X. and Others, Y., Y.P. and Z., concerns ineffective investigations into rape, false imprisonment and incitement to prostitution and allegations of sexual abuse in a social care home (procedural violations of Articles 3 or 8). In the S.Z. case, the European Court found a “systemic problem” of ineffectiveness of criminal investigations in Bulgaria. The Z. case concerns in addition two additional shortcomings in a criminal investigation into an alleged rape, a failure to examine in a meaningful manner whether the evidence indicated a lack of consent on the applicant’s part (who was 13 years old at the time) and whether charges for rape should have been filed.

Latest relevant decisions: [CM/Del/Dec\(2025\)1545/H46-13](#)

Latest submissions: [DH-DD\(2025\)326](#)

[I.G.D. \(70139/14\) \(enhanced supervision\)](#): This case concerns the lack of direct access to automatic and periodical judicial review concerning the placement of the applicant, an endangered minor, in closed boarding school between 2012 and 2015 (violation of Article 5 § 4).

It also concerns an infringement of the applicant's right to private and family life and the lack of an effective remedy, due to the authorities' decision to place him in a closed boarding school to punish his behaviour, considered deviant, while his mother had difficulties assuming her parental responsibilities. The European Court of Human Rights noted that the placement was maintained for the maximum period of three years, without the authorities having considered less restrictive measures or examined the situation of the applicant, who was a victim of violence in the boarding school, in the light of the best interests of the children; and without guarantees proportionate to the seriousness of the interference and the interests at stake. The Court also noted that the authorities had not taken any measures to facilitate the reunification between the applicant and his mother and to accommodate the needs of the applicant and his mother (violations of Articles 8 and 13).

Latest submissions: [DH-DD\(2025\)724](#)

Examination by the Committee of Ministers: [CM/Del/Dec\(2025\)1537/H46-7](#)

[Y. and Others \(9077/18\) and A.E. \(53891/20\) \(enhanced supervision\)](#): The Y. and Others case concerns the authorities’ failure to protect the life of a woman, who was a victim of domestic violence, had filed several

complaints stating that she feared for her life and was shot dead by her husband in 2017. The Court found that the authorities had failed to take adequate operational measures to protect the victim, as they had failed to respond promptly to the victim's complaints of domestic violence, to her allegations that her husband owned a gun and to carry out a proper assessment of the risk to her in view of the specific context and dynamics of domestic violence (violation of Article 2 of the Convention). The A.E. case concerns the Respondent State's failure to provide adequate protection in 2019-2020, both in law and in practice, to a minor victim of domestic violence, as well as discrimination on account of the authorities' failure to adequately address domestic violence against women in Bulgaria (violations of Article 3 and of Article 14 in conjunction with Article 3). The European Court held that Bulgarian law fell short of the State's positive obligation to put in place an effective system punishing all forms of domestic violence and providing sufficient safeguards for victims. Moreover, the response of the prosecutors to the applicant's complaints about serious acts of violence (by refusing to open investigation and by failing to open criminal proceedings ex officio) was also not in compliance with the Convention requirements. In addition, the authorities had not disproved the applicant's prima facie case of a general institutional passivity in matters related to domestic violence in Bulgaria.

Latest submissions: [DH-DD\(2026\)34](#)

Examination by the Committee of Ministers: [CM/Del/Dec\(2025\)1521/H46-10](#)

Transparency of administrative decisions and scope of sanctions (incl. their publication and rules on collection of related data) and judicial review (incl. scope, suspensive effect)

[Ekimdzhiev and Others](#) (70078/12) (*enhanced supervision*): Inadequate legal safeguards against arbitrariness and abuse in the secret surveillance system and the system of retention and access of communications data (violations of Articles 8 and of Article 13).

Latest submissions: [DH-DD\(2026\)82](#)

Examination by the Committee of Ministers: No new examination in 2025. Latest decisions [CM/Del/Dec\(2022\)1451/H46-7](#) (December 2022) and [CM/Del/Dec\(2023\)1475/H46-10](#) (September 2023), to be read together.

The case is scheduled for examination by the Committee of Ministers in March 2026.

[CM/Del/Dec\(2025\)1545-app1](#) - Consolidated indicative list of cases for the 1553rd meeting (March 2026) (DH) adopted at the 1545th meeting - Appendix 1

Implementation by the public administration and state institutions of final court decisions

[Lyubomir Popov](#) (69855/01), [Sivova and Koleva](#) (30383/03) and [Mutishev and Others](#) (18967/03) groups (*enhanced supervision*): unjustified delays in complying with judgments and administrative decisions recognising the applicants' rights to restitution of agricultural land or forests collectivised during the communist era or to compensation thereof (violations of Article 1 of Protocol No. 1).

Latest decisions: No new examination in 2025. Latest decisions: [CM/Del/Dec\(2023\)1468/H46-6](#)

Latest submissions: No new submission in 2025. Latest information could be found here [DH-DD\(2024\)1312](#)

According to the [Indicative Work Programme for 2026](#), an examination is proposed for June 2026.

[C.G. and Others](#) (1365/07) (*enhanced supervision*): Shortcomings in the judicial review mechanism set up in 2003 in the field of expulsion on national security grounds, including lack of publicity of judgments in classified cases.

Latest decisions: No new examination in 2025. [CM/Del/Dec\(2024\)1514/H46-13](#)

Latest submissions: [DH-DD\(2024\)966](#)

Property rights

[Yordanov and Others](#) (265/17) (*standard supervision*): Forfeiture of applicants' assets as "unlawfully acquired" without specifying the prohibited conduct resulting in their acquisition or establishing any link between those assets and the conduct

Latest submissions: [DH-DD\(2024\)1006](#)

[Shesti Mai Engineering](#) OOD and Others (17854/04) (standard supervision)

Freedom of expression and other cases concerning journalists

[Bosev](#) (62199/19) (standard supervision): Domestic court's lack of impartiality infringing right to impartial tribunal and freedom of expression of a journalist convicted of defamation

Latest submissions: [DH-DD\(2025\)284](#)

[Girginova](#) (4326/18) (standard supervision): unjustified refusal to grant the applicant, a journalist, access to the reasoned judgment acquitting a former Minister of Internal Affairs in classified proceedings concerning unlawful surveillance and lack of an effective remedy in this respect.

Latest submissions: [DH-DD\(2026\)21](#)

[Mestan](#) (24108/15) (standard supervision): Violation of the right to freedom of expression due to the absolute legal prohibition on a politician using a non-official language during an election campaign

Latest submissions: [DH-DD\(2024\)770](#)

II Anti-corruption framework

PACE

Monitoring committee [Doc. 16316](#)

Bulgaria aimed to strengthen its fight against high-level corruption through the Anti-Corruption Act of October 2023, modernising investigatory powers and promoting transparency in public procurement. Regrettably, despite these legislative advancements and compliance with multiple GRECO recommendations, the country continues to face persistent challenges in securing final convictions in high-profile corruption cases, and an improved legal framework is expected to translate into more effective anti-corruption outcomes.

GRECO

[Compliance Report](#) (6 February 2025)

5th round: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies

III Media pluralism

PACE

Monitoring committee [Doc. 16316](#)

Human rights and freedom of expression have seen notable improvements, such as enhanced protection for journalists and clearer legal definitions of hate speech. However, issues remain – including media ownership concentration, strategic lawsuits against journalists, and the slow integration of the Roma minority, which represents about 5% of Bulgaria's population. Recent legislative measures and national awareness campaigns have bolstered protections against hate speech and domestic violence, but further investments in victim support and Roma inclusion are needed to close persistent social gaps.

IV Other institutional issues related to checks and balances

EXECUTION OF JUDGMENTS OF THE EUROPEAN COURT OF HUMAN RIGHTS

Riza and others (48555/10) (standard supervision): Unjustified infringement of the right to participate in legislative elections caused by the partial annulment of election results.

Latest information could be found here [DH-DD\(2016\)934](#)