

**INPUT
TO THE 2026 ANNUAL REPORT ON THE RULE OF LAW**

**23 January 2026
City of Sofia**

List of abbreviations used

ACC	Anticorruption Commission
AFCOS	Protection of the European Union Financial Interests Directorate
AMoI	Academy of the Ministry of Interior
APIA	Access to Public Information Act
ASA	Amendment and Supplement Act
BCP	BorderCheck Points
BNR	Bulgarian National Radio
BNT	Bulgarian National Television
BPGD	Border Police General Directorate
CA	The Customs Agency
CAC	Commission on Appraisal and Competitions
CACIAF	Commission for Anti-Corruption and Illegal Assets Forfeiture
CC	Criminal Code
ACA	Anti Corruption Act
CCIAF	Counter Corruption and Illegal Assets Forfeiture Act
CECBM	Code of Ethical Conduct of Bulgarian Magistrates
CM	Council of Ministers
CPC	Civil Procedure Code
CCP	Criminal Code of Procedure
CPD	Commission for Protection against Discrimination
CRB	Constitution of the Republic of Bulgaria
CC	Constitutional Court
EC	European Commission
ECA	Electronic Communications Act
EJTN	European Judicial Training Network
ESMF	European Shared Management Funds
ID	Inspectorate Directorate
ISD	Internal Security Directorate
ISJC	Inspectorate of the Supreme Judicial Council
JSA	Judicial System Act
JMWJSC	Judicial Map, Workload and Judicial Statistics Commission
LAA	Legal Assistance Act
LMDPOWADMSP	Law on the mandatory deposit of printed and other works and on the announcement of distributors and media service providers
LNA	Law on Normative Acts
LRT	Law of Radio and Television
MC	Ministry of Culture
MF	Ministry of Finance
MFA	Ministry of Foreign Affairs
MH	Ministry of Health

MJ	Ministry of Justice
MoI	Ministry Of Interior
NA	National Assembly
NHIF	National Health Insurance Fund
NIJ	National Institute of Justice
NIS	National Investigation Service
NPGD	National Police General Directorate
NRA	National Revenue Agency
NRRP	National Resilience and Recovery Plan
PADVA	Protection Against Domestic Violence Act
PPA	Public Procurement Agency
PPA.	Public Procurement Act
PPO	Public Prosecutors Office
SAC	Supreme Administrative Court
SANS	State Agency for National Security
SAPO	Supreme Administrative Prosecutor's Office
SCC	Supreme Court of Cassation
SCPO	Supreme Cassation Prosecutor's Office
SJC	Supreme Judicial Council
SJCP	Supreme Judicial Council Plenum
SPC	Supreme Prosecutor's Council
UAAFA	Unlawfully Acquired Assets Forfeiture Act
UISC	Uniform Information System of the Courts

I. Justice System

Please provide information on measures taken to follow-up on the recommendations received in the 2024 Report regarding the justice system (if applicable):

Recommendation: *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 Ministry of Justice has prepared a draft Act amending the Judicial System Act, which aims to optimise the legal framework in key areas such as:

- ensuring compliance of the JSA with the Act amending and supplementing the Constitution of the Republic of Bulgaria (SG No 106 of 2023) and Constitutional Court Decision No 13 of 26 July 2024 in Constitutional Case No 1/2024;

- **clarification of the provisions on competition procedures to ensure timely regular promotion competitions to avoid the long-term secondment of judges to fill vacant posts, taking into account European standards on secondment of judges;**

- improving the arrangements for attestation;
- making progress on legislative amendments aimed at improving the functioning of the Inspectorate to the Supreme Judicial Council (ISJC) and avoiding the risk of political influence, in particular by involving judicial authorities in the selection of its members;

- changes in the activity of conducting checks on the integrity and conflict of interest of judges, prosecutors and investigators, of their property declarations, as well as to identify actions that undermine the prestige of the judiciary and those related to the violation of the independence of judges, prosecutors and investigators;

- increasing the effectiveness of the training activities of the National Institute of Justice, reflecting the experience gained, the challenges to European judicial training and the increasing demands on justice professionals;

- the introduction of real and full e-Justice, as well as the facilitation of access to justice.

In the course of the public consultation and interdepartmental coordination, opinions were received from various institutions.

Work is currently ongoing on the reflection of the proposals received, as well as on the development of provisions in the JSA in response to the recommendations of the 2025 Rule of Law Report and the recommendations of the Organisation for Economic Co-operation and Development, which do not require a change to the Constitution aimed at strengthening the independence of the prosecutor for the investigation of crimes committed by the Prosecutor General or by a deputy of the Chief and members of the Supreme Judicial Council after the end of their mandate.

Recommendation: *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.*

Following the recommendation, the following measures were taken in 2025:

In 2025, a working group formed by an Order of the Minister of Justice (in which representatives of the ISJC also participated) completed its work on drafting the bill. See more in the information under Recommendation 1.

The latter included proposals for regulatory changes repeatedly advocated by the ISJC, the most important of which relates to the procedure for the nomination of candidates for Chief Inspector and Inspectors and their selection (Article 44 JSA), and follows from recommendations in a number of European Commission Rule of Law Reports, including the 2025 Report, as well as those expressed by the Venice Commission, to ‘progress on legislative amendments aimed at improving the functioning of the ISJC and avoiding the risk of political influence, in particular by involving judicial authorities in the selection of its members’. According to our idea, which was adopted by the working group, the judicial authorities should put forward 6 nominations for chief inspector and 30 nominations for inspectors, and the general assembly of judges of the Supreme Court of Cassation and the Supreme Administrative Court should submit to the National Assembly 3 nominations for chief inspector and 21 nominations for inspectors, and the general assembly of prosecutors from the Supreme Prosecutor's Office and investigators from the National Investigation

Service - 3 nominations for chief inspector and 9 nominations for inspectors selected by secret ballot from among the nominated candidates. Our proposal for 6 times the number of candidacies for Chief Inspector and 3 times the number of candidacies for inspectors from the judicial authorities was dictated by the need for MPs to have a greater possibility of selection in the selection of the members of the Inspectorate and to choose those of them who best meet the requirements for the position. This will, on the one hand, greatly guarantee the independence of the ISJC, avoiding the risk of political influence, and, on the other hand, strengthen the institutional capacity of the Inspectorate.

In addition to the idea set out above concerning the selection of members of the Inspectorate, we have also proposed the clarification of individual powers of the body to improve its functioning, detailed in Annex 6).

Recommendation: 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

Please, see the information under the first Recommendation

A. Independence

☐ No developments

☒ If there have been developments related to the independence of justice, please specify which, in particular regarding topics listed below: ...

In the course of constitutional case No 5/2025, initiated at the request of a three-member panel of the Supreme Administrative Court to establish the unconstitutionality of provisions of the Act Amending and Supplementing the Judicial System Act (§16 TFP and Article 33(4) of the JSA), procedural changes occurred, which led to the termination of the proceedings.

On 1 December 2025, the Constitutional Court was informed by Order No 12221/01.12.2025 of the Supreme Administrative Court, Sixth Division, that administrative case No 1077/2025, on the basis of which the request under Article 150(2) of the Constitution was made, was terminated due to the withdrawal of the complaint. This removes the requirement of a pending specific case in which the contested provisions are applicable.

In the absence of a constitutionally admissible subject matter, the Constitutional Court, by Order No 9 of 11 December 2025, discontinued the proceedings in civil case No 5/2025.

1. Appointment and selection of judges¹, prosecutors and court presidents (including judicial review)

Please, see preliminary relevant information under the first and second Recommendation

There has been no change in the legal framework and the judicial review carried out.

Since 27 March 2025, the Constitutional Court has been fully composed of 12 constitutional judges. With regard to judicial independence, reference should be made to the public attacks on the Supreme Court of Cassation and the leadership of the court that took place in 2025, please see Annex 10.

2. 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)

In 2025, the Judicial College of the Supreme Judicial Council (SJC) appointed 18 ranked candidates to the position of ‘judge’ in the administrative courts, pursuant to a decision under Protocol No 23 of 15 July 2025. The competitive procedure opened by a decision under Protocol No 46/10.12.2024 for the promotion and occupation of 17 posts of ‘judge’ in the administrative courts under Article 189(1) and (2) of the JSA also continued.

During the reference period, the Supreme Administrative Court (SAC) examined and ruled on complaints from participants in other competitions organised by the SJC.

¹ The reference to ‘judges’ refers to judges at all levels and types of courts, as well as judges in constitutional courts.

By decision under point 7 of Protocol No 30/28.10.2025 of the Judicial College of the SJC, on the basis of Article 160 in conjunction with Article 165(1)(1) JSA, a judge of the SAC was dismissed from the position of ‘judge’ in the SAC, with the rank of ‘judge in the SCC and the SAC’, with effect from 7.11.2025.

By decision under point 15.2. of Protocol No 42/12.11.2024, Georgi Cholakov was appointed as acting ‘administrative head – chairperson’ of the SAC as of 22.11.2024, pending the election of a new chairperson. In 2025, the election and inauguration of a new Head of Administration did not take place.

As of 22 July 2025, the functions of President of the Supreme Administrative Court have been assigned to Judge Marinika Cherneva and Judge Lyubomir Gaidov, deputies of the Administrative Head, Vice-Presidents of the Supreme Administrative Court, as well as to Judge Georgi Kolev, President of the Chair of the Second Division of the Supreme Administrative Court, and Judge Sibila Simeonova, President of the Sixth Division of the Supreme Administrative Court.

By decision under point 6 of Protocol No 27/14.10.2025, on the basis of Article 173(15) of the JSA, Judge Marinika Cherneva was appointed interim head of the SAC as of the date of the decision.

3. Promotion of judges and prosecutors (incl. judicial review)
4. Allocation of cases in courts
5. 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)
6. Accountability of judges and prosecutors, including disciplinary regime and bodies and ethical rules, judicial immunity and criminal/civil (where applicable) liability of judges (including judicial review)

In 2025, the Supreme Court of Cassation consistently held in its practice that functional immunity is a constitutional guarantee of the independence of magistrates, as the possible initiation of a civil case for their acts and acts of service would lead to the possibility of unregulated pressure on them. It has been held that that immunity precludes actions from being brought against judges in situations in which the rules on functional immunity apply. The assessment of the existence of such an impediment in the action brought must be carried out specifically, including in the light of the nature of the right allegedly infringed by acts or acts of the representative of the judiciary against whom the action is brought. The functional immunity of judges provided for in Article 132 of the Constitution of the Republic of Bulgaria shall be overcome only where the acts committed by the magistrates constitute an intentional crime duly established by a final judgment or decision under Article 124(5) of the Code of Civil Procedure. Outside this hypothesis, the State, and not the individual judge, is liable for damages resulting from court decisions in tort. In this sense, injured civil law subjects are not deprived of the legal possibility to seek compensation for damages, but not directly from the specific officials (individuals) but from the relevant state body, and if the specific conditions are met, the liability is realized in accordance with the State and Municipal Liability for Damages Act or the general procedure of Article 49 of the Obligations and Contracts Act, or they could commit the disciplinary liability of the judge for violation of the Code of Ethical Conduct of Bulgarian Judges (Decree No 2660/27.05.2025 in civil case No 1742/2025 of the Supreme Court of Cassation; Order No 2856/04.06.2025 in civil case No 1607/2025 of the Supreme Court of Cassation; Order No 4692/20.10.2025 in civil case No 1661/2025 of the Supreme Court of Cassation).

However, with regard to the members of the SJC, the SCC considered that the provision of Article 132 of the Constitution of the Republic of Bulgaria is inapplicable and they do not have immunity for the false (defamatory) statements made by them during meetings of the SJC, since according to Article 16 of the Judiciary Act, the Supreme Judicial Council does not exercise the judiciary (it is only one administrative body that represents the judiciary, ensures its independence, determines the composition and organisation of its work and manages its activities). In this sense is Order No 2152/29.04.2025 in civil case No 2985/2024 of the Supreme Court of Cassation.

In 2025, the Supreme Administrative Court heard and adjudicated cases brought on appealed disciplinary decisions of the SJC.

Those administrative cases were heard within three months of their initiation and the panel of judges concerned issued a judicial decision within one month of the last hearing in the case.

The Supreme Administrative Court (SAC) has a Professional Ethics Commission (PEC), which is an auxiliary body to the PEC of the Judicial College of the SJC.

Pursuant to Article 39b(5) of the JSA, the PEC of the SAC carries out its activities on the implementation of the Code of Ethical Conduct for Bulgarian Judges (the Code), in accordance with the rules on its organisation and activity adopted by the Judicial College of the SJC, by carrying out checks (including on signals from citizens and legal persons) on the existence of conduct contrary to the rules of professional ethics laid down in the Code.

With regard to independence, and in particular with regard to the accountability of judges, prosecutors and investigators, including the disciplinary liability of magistrates and compliance with ethical rules, the ISJC took the following measures in 2025:

1. On the basis of Article 312(1)(3) of the JSA, 1 (one) proposal was made to the Judges' Chamber of the SJC to initiate disciplinary proceedings to impose a disciplinary penalty on a judge for an infringement under Article 307(3)(3) of the JSA, in conjunction with Article 175k(4) of the JSA, to carry out acts, including infringements of the Code of Ethical Conduct for Bulgarian Judges, which undermine the prestige of the judiciary in an inspection opened in 2024 but concluded in 2025.

On the basis of the proposal made by the ISJC, disciplinary case No 3/2025 of the Judicial Chamber of the SJC has been initiated and has not yet been concluded.

The absence of proposals to the colleges of the SJC to initiate disciplinary proceedings to impose disciplinary penalties on judges, prosecutors and investigators is a direct consequence of the judgment of 30 April 2025 in joined cases C-313/23, C-316/23 and C-332/23 of the Court of Justice of the European Union (CJEU). In that judgment, the Luxembourg court held that safeguarding the independence of judges precludes the practice of a Member State in which the members of a judicial body of that Member State, elected by its parliament for a fixed term and vested with those powers, continue to perform their duties after the end of the mandate laid down in the Constitution until the election of new members, where the continuation of their duties is not based on an express legal basis in national law containing clear and precise rules governing the performance of those duties and where it is not ensured that such continuation is in practice limited in time. In view of the interpretation given in the judgment of the CJEU and on the basis of Article 267 of the Treaty on the Functioning of the European Union (TFEU), the ISJC, in its position of 8 May 2025, accepted that the judgment of the Luxembourg court restricts the possibility of exercising its power under Article 54(1)(8) of the JSA to carry out checks on integrity, conflicts of interest, the identification of acts that undermine the prestige of the judiciary and those related to the violation of the independence of judges, prosecutors and investigators, as well as the power under Article 54(1)(6) of the JSA to make proposals for imposing disciplinary sanctions on judges, prosecutors, investigators and administrative heads of judicial bodies, in so far as those powers directly concern the disciplinary liability of judges and affect their independence. In view of the above, the Inspectorate decided by decision of 4 June 2025 that, on the basis of Article 267 TFEU, if there is sufficient evidence of a conflict of interest or of acts or omissions contrary to the principles of integrity, detrimental to the prestige of the judiciary or related to the violation of the independence of judges, prosecutors and investigators, the materials should be sent to the administrative head of the inspected magistrate, to the superior administrative head and to the Minister for Justice, with a view to assessing the exercise of their powers under Article 312(1)(1), (2) and (4) of the JSA.

2. In 2025, no proposals were made to initiate disciplinary proceedings for infringements under Article 307(3)(1) and (2) of the JSA, again in accordance with the above-mentioned judgment of the CJEU. For violations of the movement and/or closure of cases and files found during the inspections – systematic failure to comply with the deadlines laid down in the procedural laws, as well as for an act or omission that unduly delays the proceedings, the Inspectorate took action to send the act and the materials of the inspection to the administrative head of the inspected magistrate, to the superior administrative head and to the Minister for Justice, with a view to assessing the exercise of their powers under Article 312(1)(1), (2) and (4) of the JSA.

3. On the basis of Article 54(1)(5) in conjunction with Article 311(1) and Article 327 of the JSA, 15 alerts were issued in 2025 to administrative heads of judicial authorities recommending the imposition of a disciplinary measure under Article 327 of the JSA or the disciplinary liability of judges and prosecutors for delays in the movement and/or closure of a specific case/file.

4. By decision of 11 January 2024, on the basis of Article 54(1)(18) of the JSA, the Inspectorate to the Supreme Judicial Council adopted models for reporting on the closure of cases and files within the established time limits by the judicial authorities, after their coordination with the two colleges of the SJC. The templates were published on the ISJC

website at: <http://www.inspectoratvss.bg/bg/page/188>. Subsequently, changes in the legislation led to the need to correct some of the templates for the results of closed files and cases of prosecutors and investigators for 2024, which, after their consultation with the Prosecutorial College of the SJC, were adopted by the Inspectorate by decision of 17.01.2025 and published on the above-mentioned email address. On the basis of the templates adopted by the Inspectorate, all judicial authorities (courts, prosecutor's offices and investigation departments attached to them) submitted their reports on the closure of cases and files by 15 March 2025, within the established deadlines in 2024.

On the basis of Article 54(1)(3) of the JSA, on the basis of the reports provided by the judicial authorities, the ISJC prepared an Analysis of the results of the closed cases and files within the established time limits by the courts, the prosecutor's office and the investigating authorities for 2024. The competence to prepare this analysis was conferred on the ISJC with an addendum to the JSA of 2023 (promulgated in SG No 84 of 2023) with the aim of strengthening the role and capacity of the ISJC in preventing and countering corruption in the judiciary. The analysis contains aggregated statistics on the total number of cases and files opened and dealt with by the courts, the Prosecutor's Office and the investigating authorities in 2024, completed and remaining open cases and files at the end of the reporting period. The number of cases closed by a final court decision was also reported in order to provide information on the percentage of cases closed by a final decision. It is examined in which judicial bodies there is a higher percentage of pending cases and files at the end of the reporting period, as well as by when the proceedings are completed. The examination of the data provided with the accounts allows conclusions to be drawn both on the timing of the closure of cases and files and on the types of cases that last longer.

The analysis also continues the implementation of the fourth indicator under the measure entrusted to the ISJC 'Strengthening the role of the Inspectorate to the Supreme Judicial Council for the Prevention and Counteraction of Corruption in the Judiciary (Q4/2022)', set out in Reform 2: 'Countering Corruption' in the National Recovery and Resilience Plan of the Republic of Bulgaria (NRRP).

The analysis was published on the ISJC website at: <http://www.inspectoratvss.bg/bg/page/16>

7. Independence/autonomy of the prosecution service

In 2025, the National Assembly adopted amendments to the JSA, which affected the structure and management of the Prosecutor's Office. According to the amendment to Article 136 of the JSA,² the Public Prosecutor's Office of the Republic of Bulgaria consists of the Prosecutor General, the Supreme Cassation Prosecutor's Office, the National Investigation Service, appeal prosecutor's offices, the military appellate prosecutor's office, district prosecutor's offices, military district prosecutor's offices and district prosecutor's offices. In the Supreme Cassation Prosecutor's Office (SCPO), an administrative department is established (after the closure of the Supreme Administrative Prosecutor's Office³ and similarly to the regional prosecutor's offices), the prosecutors of which participate in proceedings in administrative cases.

The Prosecutor General organises the activities of the Supreme Prosecutor's Office of Cassation and the administrative heads of the Prosecutor's Office (Article 138(1)(2) of the JSA), while the National Investigation Service (NIS) is headed by⁴ a Director who is also a deputy to the Prosecutor General. The Director of the NIS shall exercise administrative, organisational and methodological direction of the investigators and employees of the NIS (Article 150 of the JSA).

The amendment to the JSA also changed the procedure for the election of candidates for Presidents of the Supreme Court of Cassation, the Supreme Administrative Court and the Prosecutor General (Article 173 of the JSA) – only elected members of the SJC whose mandate has not expired by the date of the proposal or decision may take part in the vote opening the procedure; if the President refuses to issue a decree on the appointment of the candidate proposed by the plenary of the SJC, a re-proposal may be made at least two months after the President's decree refusing his appointment has been received; in the event of early termination or expiry of the term of office of the Presidents of the

² Act Amending and Supplementing the Judicial System Act, prom. SG No 6/2025, in force as from 21 January 2025

³ According to the 2023 amendment to the KRB, the Supreme Administrative Prosecutor's Office is closed.

⁴ Until the amendment to the JSA (prom. SG No 6/2025), the Prosecutor General shall organise the activities of the Supreme Cassation Prosecutor's Office, the Supreme Administrative Prosecutor's Office, the National Investigation Service and the administrative heads of the Prosecutor's Office.

SCC and the Prosecutor General, a person is appointed to perform the respective functions on an interim basis and the same person is not entitled to perform the functions for a period longer than 6 months, regardless of whether there have been interruptions in their performance⁵.

According to §16 of the Transitional and Final Provisions of the JSA (in force since 21.01.2025), the procedures for the election of the Presidents of the Supreme Court of Cassation, the Supreme Administrative Court and the Prosecutor General, which have begun but have not been completed by a decree of the President, are terminated. By decision of the plenary session of the SJC⁶ on the basis of Article 56(1) of the APC, in conjunction with §16 of the Transitional and Final Provisions of the JSA, the open procedure for the election of the Prosecutor General⁷ was terminated. An administrative case was brought before the Supreme Administrative Court against the decision of the plenary session of the SJC on an appeal lodged by the acting Prosecutor General (candidate in the procedure for the election of the Prosecutor General). By a three-member panel of the Supreme Administrative Court, a request was submitted to the Constitutional Court to establish the unconstitutionality of the provisions of §16 of the Transitional and Final Provisions of the JSA (prom. SG No 6 of 2025) and Article 33(4) of the JSA (promulgated in SG No 64/2007, last amended and supplemented SG No 6 of 2025, JSA) owing to a conflict with Article 1(2), Article 4(1), Article 5, Article 8, Article 117(2), Article 129(2), Article 130, Paragraph 1, Article 130a, Article 130b of the Constitution.

In the course of the examination of civil case No 5/25, the Constitutional Court was informed, by order of the Supreme Administrative Court, that the administrative case on the basis of which the request was submitted to the Constitutional Court had been discontinued due to the withdrawal of the complaint on the basis of which it was initiated. By Order No 9 of 11 December 2025 of the Constitutional Court, the proceedings under Civil Procedure No 5/2025 were discontinued.

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

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

B. Quality of justice⁸

☐ No developments

☒ If there have been developments related to the quality of justice, please specify which, regarding in particular topics listed below: ...

Relevant topics to be covered in your contribution include:

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

The draft Act amending the JSA referred to in point I.1. modernises the rules on e-Justice. The same objective is pursued by the already voted draft Act amending and supplementing the Administrative Procedure Code, promulgated in SG No 63 of 2025.

The amendments aim to create a framework that would presuppose the optimisation of the work and efficiency of administrative bodies and the judiciary in the process of introducing digitalisation in administration and justice, implementing measure ‘Entry into force of legislative amendments to the Administrative Procedure Code regulating the legal framework for e-justice in administrative cases (Q4/2024)’, Reform 1 ‘Affordable, effective and predictable justice’ of the National Recovery and Resilience Plan.

The Act implements Stage 215 of Component 10 ‘Business Environment’ of the National Recovery and Resilience Plan, aimed at enabling:

- judicial decisions to be drawn up as an electronic document and to be signed with a qualified electronic signature;

⁵ At a meeting of the Prosecutorial College of the SJC, the view was adopted that the new provision of Article 173(15) of the JSA was not given retroactive effect and therefore did not concern pending cases.

⁶ Decision of the Plenary of the SJC on Protocol No 2 of 23 January 2025

⁷ Decision of the Plenary of the SJC on Protocol No 19 of 22 June 2023

⁸ Under this topic, Member States are not required to give statistical information but should provide input on the type of information outlined under section 2.

- to exercise procedural rights and perform procedural acts in electronic form by the parties in legal proceedings by submitting administrative documents in electronic form by means of secure identification;
- to hold remote virtual open court hearings.

With the understanding that the effective achievement of the digitalisation of the procedural actions of the court, the parties and other participants in and outside the open court hearings presupposes the availability of fully-fledged electronic cases, the project also proposes the creation of a number of prerequisites for ensuring at the procedural stage before the administrative authority:

- the possibility to initiate administrative proceedings in electronic form and, for an extended range of qualified entities, an obligation to do so;
- a legal obligation to maintain and send administrative files in a structured electronic form;
- the possibility of electronic communication between the authorities and the participants in the proceedings and again - an obligation to do so for a certain circle of entities;
- acquaintance with the file electronically when technologically possible;
- informing citizens of the new procedural possibilities.

At the same time, the law provides guarantees for cases of technological impossibility, in the presence of specific legal requirements concerning the format of the acts, etc.

The expected results of the implementation of the law are reducing the administrative burden and improving access to justice, increasing transparency and speeding up administration and litigation, reducing budgetary costs.

The digitalisation of proceedings saves citizens money and time in physical presence when submitting documents and in court hearings; allow documents to be submitted and consulted quickly, at any time and from any place that is of particular benefit to persons with disabilities and participants with a high level of commitment; reduce the cost and time of serving various summonses and messages; paper consumption is reduced and the need for archiving conditions is reduced.

A significant change is also the new legal position introduced by the text of Article 193(2) of the APC, according to which in the event of an interim annulment of a normative act, the case challenging it is not necessarily terminated.

Art. 193. (2) In case of cancellation of the contested secondary normative act or part thereof after the filing of the appeal, the court shall rule on the contestation, where the application of the act until its cancellation affects subjective rights, freedoms or legitimate interests of any of the parties. In that case, the court may declare the contested regulatory act or part thereof null and void, declare it unlawful in whole or in part, or reject the challenge.

Further, in State Gazette No 53 of 1 July 2025, the amendments to the Regulation on the payment of legal aid were promulgated, which resulted in an update of the remuneration for certain types of legal aid and a fine-tuning of certain regulatory provisions;

- A working group has been set up in the National Legal Aid Bureau to prepare proposals for changes in the legal aid legal framework in the Republic of Bulgaria, which continues to work to this day. Its aim is to improve the functioning of the legal aid system;

- A working group was set up in the State Agency for Refugees at the Council of Ministers, with the participation of representatives of the NLAB, in connection with the preparation of legal amendments and supplements to the EU Pact on Migration and Asylum. At present, a working draft law has been prepared, on which numerous comments have been sent and its final submission for discussion is pending;

- The Memorandum on Cooperation and Partnership for Timely Protection of Victims of Domestic Violence, concluded between the Ministry of Interior, the Ministry of Justice and the National Legal Aid Bureau and the Bar Associations, to which regional counselling centres operate, continues to be expanded to include the Ombudsman, the Agency for Social Assistance and non-governmental organizations, to coordinate joint efforts and actions to protect victims of domestic violence.

11. Resources of the judiciary (human/financial/material⁹), remuneration/bonuses/rewards for judges and

⁹ Material resources refer e.g. to court buildings and other facilities. Financial resources include salaries of staff in courts and prosecution offices.

prosecutors, including observed changes (significant and targeted increase or decrease over the past year),

12. Training of justice professionals (including judges, prosecutors, lawyers, court staff, clerks/trainees)

To increase the quality of law enforcement and the effectiveness of prosecution, a total of 75 training sessions (remote and face-to-face) were carried out in 2025, organised by the PDB under the Intra-Service Programme, by the NIP and by other external providers. A total of 781 prosecutors, 287 investigators and 10 prosecutorial assistants were trained.

The training activities of the National Institute of Justice in 2025 reflected the objectives set out in the NIJ Annual Plan for 2025, with a focus on independent, effective and European-oriented justice and providing a lifelong learning environment, in line with national and European priorities.

A total of 10447 participants (3921 judges, 1239 prosecutors, 435 investigators, 572 court assistants, 84 prosecutor's assistants, 2990 court officials, 114 state bailiffs, 52 registry judges, 466 jurors, 115 foreign participants and 270 other representatives of the professional community) took part in 348 training activities of the NIJ. The mandatory 9-month training was completed by 20 candidates for junior judges, 19 candidates for junior prosecutors and 12 candidates for junior investigators, and the new school year started 38 candidates for junior judges, 32 candidates for junior prosecutors and 16 candidates for junior investigators. Detailed information on the trainings can be found in Appendix 7.

Act Amending and Supplementing the Judicial System Act referred to in point I.1 reformed the framework for judicial training.

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

An Order of the Minister of Justice established working group to prepare legislative changes in relation to the implementation of Regulation (EU) 2023/2844 on the digitalisation of judicial cooperation and access to justice in cross-border civil, commercial and criminal matters, and amending certain acts in the field of judicial cooperation, and implementing Directive (EU) 2023/2843 amending Directives 2011/99/EU and 2014/41/EU of the European Parliament and of the Council, Council Directive 2003/8/EC and Council Framework Decisions 2002/584/JHA, 2003/577/JHA, 2005/214/JHA, 2006/783/JHA, 2008/909/JHA, 2008/947/JHA, 2009/829/JHA and 2009/948/JHA as regards the digitalisation of judicial cooperation.

The draft Act amending the JSA referred to in point I.1. modernises the rules on e-Justice. The same objective is pursued by the Act amending the Code of Administrative Procedure (APC), promulgated in SG No 63 of 2025.

Within the framework of the SAC's project 'Digitalisation of key judicial processes in the administrative justice system' approved in the Recovery and Resilience Plan, three of the activities envisaged in the project were completed in 2025: 'Development and implementation of a module for the reconciliation of the EIDR with the Electronic Portal for summoning the SJC and that of the SJC on the parties to administrative cases'; 'Development and implementation of an information module enabling the digital remote submission and receipt of electronic documents in court cases by the parties and their procedural representatives'; and 'Development and implementation of an information module for conducting remote closed hearings of the panels'.

14. 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)

15. 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.

16. 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

The Act amending and supplementing the Code of Civil Procedure aims to implement Reform 3 ‘Expanding the use of alternative dispute resolution methods and introducing mediation, mandatory in certain types of cases, Milestone 227 ‘Legislative amendments to the relevant legislation introducing mandatory judicial mediation in certain civil and commercial disputes entered into force’ of the National Recovery and Resilience Plan, taking into account Decision No 11 of 1 July 2024 in Case No 11 of 2024 of the Constitutional Court. The bill also makes corresponding amendments to the Mediation Act. The Act was adopted on 27 June 2025 in a second plenary vote and promulgated in State Gazette No 55 of 2025. <https://dv.parliament.bg/DVWeb/broeveList.faces>

Regulation No 12 of 28 July 2025 on mediators and procedures in judicial mediation centres was issued by the Supreme Judicial Council (promulgated in SG No 62 of 30 July 2025, in force as of 30 July 2025).

Regulation No 11 of 30 October 2023 on the structure and organisation of the activities of judicial mediation centres was issued by the Supreme Judicial Council (published in SG No 94 of 10 November 2023, in force as of 1 July 2024, and amended and supplemented in SG No 62 of 30 July 2025, in force as of 30 July 2025).

C. Effectiveness of the judicial system¹⁰

☐ No development

☒ In case there are developments related to efforts to improve the efficiency of the judicial system (e.g.: as regards the length of proceedings), please state:

Please, see information provided under point ‘Current state of play of the reform to extend judicial review of prosecutorial acts in the event of termination and suspension of investigations into crimes without victims’.

Other – please specify

Additional question: What follow-up action has been taken on the work of the ad hoc commissions to investigate cases of intimidation of magistrates and possible infiltration of the judiciary once they have completed their work.

The Sofia City Prosecutor's Office did not take any action related to the activities of the parliamentary committee due to the lack of a report and conclusions suggesting concrete actions.

Additional question: Have there been any steps taken to address the issue with the Sofia City Prosecutor's Office structure for the investigation of magistrates .

The Sofia City Prosecutor’s Office has a Section for Crimes Committed by Judges, Prosecutors and Investigators, which currently includes 7 prosecutors. The work in the unit is assigned to the principle of random selection.

The Investigative Division of the Sofia City Prosecutor’s Office has a separate sector ‘Anti-Corruption and Crimes Committed by Judges, Prosecutors and Investigators’, which consists of 10 investigators conducting investigations into crimes committed by magistrates.

Both prosecutors conducting inspections and directing and supervising investigations against magistrates and investigators conducting investigations have high integrity and professional training.

Additional question: State of play of the reform to extend judicial review of prosecutorial decisions for cases of termination and suspension of investigations for victims less crimes.

¹⁰ On this topic, Member States are not required to provide statistical information, but should provide information on the type of information referred to in Section 2.

The Act amending and supplementing the Code of Criminal Procedure, adopted by the Ministry of Justice on 13 November 2025, widens the range of persons who can initiate judicial review of prosecutorial orders terminating and suspending criminal proceedings, creating additional guarantees for the correct application of substantive and procedural law when proceedings are suspended or terminated.

By regulating specific situations in which the Prosecutor General may exercise his or her power to revoke a decision terminating criminal proceedings after the expiry of the time limits for judicial and judicial review, and on the basis of clearly defined, explicit and well-established grounds in the case-law, compliance with the rights of persons subject to criminal liability is ensured, as well as a higher standard of protection of the rights of all participants in the process.

The creation of the possibility to divide and join cases against several defendants in the trial phase of the proceedings by amending and supplementing Article 248 of the ACC ensures both the effectiveness of the process and the protection of the rights of victims.

The introduction of an additional hypothesis for requesting the acceleration of criminal proceedings under Article 368 of the ACC (where more than one year has elapsed since the start of the pre-trial proceedings and no person has been charged) achieves a substantial guarantee that investigative actions are carried out in a timely manner, even in the event of objective difficulties in attracting an accused person.

Adopted by the National Assembly and promulgated in State Gazette No 97 of 14 November 2025.

Additional question: Have there been any steps taken to address the procedural issues hampering the functioning of the investigation mechanism of the Prosecutor General and his/her deputies.

Please, see information provided for the first recommendation.

II. Anti-corruption framework¹¹

Please provide information, in order to follow up on the recommendations received in the 2025 Report, on the measures taken related to the anti-corruption framework (if applicable).

Recommendation: 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.

In 2025, the ISJC made 1 (one) proposal to the Judicial College of the SJC to initiate disciplinary proceedings to impose a disciplinary penalty on a judge for an infringement under Article 307(3)(3) of the JSA in conjunction with Article 175k(4) of the JSA – committing acts, including a violation of the Code of Ethical Conduct of Bulgarian Judges, that undermine the prestige of the judiciary in an inspection opened in 2024 but concluded in 2025.

Disciplinary case No 3/2025 was initiated on the basis of the proposal of the Inspectorate and has not yet been concluded.

With the adoption of the Anti-Corruption Act, as you already know, new functions have been attributed to the ACC in investigating corrupt acts committed by public office holders, which entered into force on 1 March 2024.

In the activity of detecting and investigating corruption offences, the ACC has powers mainly in the pre-trial phase of the proceedings.

The investigative activity cannot be assessed independently and objectively, due to the short period of entry into force of the law and the fact that the pre-trial proceedings are part of the criminal process, which ends in a longer period with the relevant court ruling.

In this regard, it is necessary to point out that the materials received from the Public Prosecutor's Office in pre-trial proceedings and prosecutorial inspections were processed on time and there was no delay on the part of the Commission. The same applies to the actions carried out to verify the alerts received by the Commission relating to acts of corruption of persons holding public office.

¹¹Where specific previous reports published in the framework of the review of the United Nations Convention against Corruption, of GRECO and of the OECD address the issues listed below, please refer to the points to which you wish to draw the attention of the Commission in those documents, indicating any relevant updates, changes or measures that have occurred since the publication of those documents.

The ACC remains fully operational and performs all its duties rigorously and on time, which is key for the timely and effective performance of its specific functions.

With the entry into force of the Anti-Corruption Act as of 1 March 2024, the ACC has been entrusted with new powers to investigate corruption offences committed by public office holders. The Commission performs those functions primarily at the pre-litigation stage. Due to the short period since the adoption of the law and the nature of the criminal process, the investigative activity cannot yet be objectively assessed. All materials received by the Prosecutor's Office, as well as reports of corruption, were processed on time, without delay by the ACC. The Commission continues to be fully operational and to carry out its duties in a timely and effective manner.

The results achieved by the ACC in terms of investigations are as follows from 01.01.2025 to 30.06.2025 (at present, information on the results achieved in the first six months of 2025 is provided, and after the preparation of the annual report on the activities of the ACC, the data will be updated):

- According to 262 decrees issued by the Prosecutor's Office, operational and search activities were carried out in pre-trial proceedings and prosecutorial inspections in order to detect and document corruption crimes.
- A total of 253 prosecuting inspections were commissioned by the Public Prosecutor's Office authorities under the JSA concerning the verification of data on unlawful acts committed by persons holding public office.

As a result of the hard work and good professional training of the staff working at the Commission from 1 March 2024 to 30 June 2025, a total of 109 persons have been charged with corruption offences.

From 1 January 2025 to 30 June 2025, 361 alerts were received by the specialised Anti-corruption Directorate. According to the reports received by the Anti-Corruption Directorate, operational search and reference activities were carried out, documents were requested, information was obtained from persons and cross-checks were carried out on documents.

Of the total checks carried out on alerts between 1 January 2025 and 30 June 2025, the Commission took a decision on 231 alerts and the checks were completed and the relevant reports were drawn up.

The following facts can be considered positive:

- All procedural acts were carried out in compliance with the law. The actions carried out under conditions of urgency are approved by the court, and in the other cases they are carried out with the prior permission of the court.
- The supervision measures requested by the Public Prosecutor's Office in connection with the investigations carried out by the ACC have been confirmed and imposed by the relevant court.

In connection with its legal powers, the ACC carries out an inspection of any reported corruption and conflict of interest against a person holding a public office.

Specific statistical information as of 31.12.2025 on these lines of business will be provided after the preparation of the annual report on the activities of the ACC, which is prepared annually by 31 March.

On other side, the Prosecutor General has taken into account the recommendations of the European Commission for a more detailed and tabular presentation of the data under the Anti-Corruption Act in the preparation of the report on combating corruption offences for 2025, including separate reporting of the offences under Articles 3 and 6 of the Anti-Corruption Act.

By order of the Prosecutor General, a working group was set up with the task of reviewing the Rules on the collection and completion of data in the register for the national assessment of the risk of money laundering and terrorist financing (Register for the ORs) and preparing a draft for their amendment and supplement.

Enhanced methodological assistance, investigation supervision and ex officio control measures in complex and socially significant criminal proceedings continue to be implemented with a view to concluding them as a matter of priority.

Recommendation: *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.*

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

☐ No developments

☒ *If there have been developments related to the institutional framework capacity to fight corruption, please specify which, in particular regarding topics listed below.*

Relevant topics to be covered in your contribution include:

17. 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 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.

There were no significant changes in resources in the ACC in 2025, with the Commission remaining fully operational and meeting its obligations on time; the maintenance of administrative capacity has been ensured through competitive and mobility procedures (under Article 10a of the Civil Servants Act, 6 competitive procedures have been announced, and under Article 81a of the Civil Servants Act, 2 procedures have been conducted to ensure the administrative capacity of the Anti-Corruption Directorate, 19 procedures have been announced). The financial provision is guaranteed under the state budget and the effective implementation of the powers is supported by sustainable cooperation with the European Public Prosecutor's Office, on the basis of a concluded agreement, as well as with international organisations and networks with which very good contacts and cooperation have been established over the years, such as Interpol, Europol and others. The Commission also continued to cooperate and interact successfully with the other authorities operating in the field of combating corruption – the Prosecution Service of the Republic of Bulgaria, the Ministry of Interior, the State Agency for National Security, the State Agency for Technical Operations, the State Intelligence Agency, and others.

The Ministry of Interior maintains effective interaction with the Prosecutor's Office, the ACC and other control and sanctioning authorities, as well as actively cooperates with partner services from the EU and third countries, including Europol, OLAF and the European Public Prosecutor's Office. The necessary capacity to counter crimes affecting the EU's financial interests has been built and in 2025 General Directorate for Combating Organized Crime carried out 38 checks on reports of misuse of European funds and carried out 9 specialised operations against organised crime groups committing fraud with European funds.

The Prosecutor's Office maintains active interaction with the ACC, the Commission for the Forfeiture of Illegally Acquired Property, the European Public Prosecutor's Office, OLAF, AFCOS, Eurojust, the European Judicial Network and Europol. On 28.04.2025, an Agreement on Coordination and Cooperation was signed between the Prosecutor's Office, the Ministry of Interior and the State Agency for National Security, which introduced unified mechanisms for financial investigations and established national and regional coordination centres. On 26.08.2025, a new Interaction Agreement was signed between the Prosecutor's Office and the State Financial Inspection Agency, aimed at more effective control over the spending of public funds and public procurement. Cooperation with OLAF also continued in 2025, including monitoring judicial recommendations and participation in the work of the AFCOS Council. The participation of Supreme Cassation Prosecutor's Office prosecutors in the elaboration of the 'Analysis report on the development of an updated national anti-fraud strategy for Bulgaria for the period 2021-2027' was also active.

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

The Act amending and supplementing the Code of Criminal Procedure (published in SG No 57 of 2025) the following amendments shall be made:

The circle of persons falling within the scope of the law within the meaning of Article 6(1) shall be enlarged by adding the chairman and members of the Commission for Personal Data Protection, the chairmen and deputy chairmen

of other committees whose members are elected by the National Assembly, the deputies of the chairman of the Bulgarian Academy of Sciences, the rectors of state higher schools and the heads of military academies and higher military schools;

Article 8(3) of the ACA has been amended so far to remove the two-thirds qualified majority by which the National Assembly elects the members of the Anti-Corruption Commission (Article 8(3)), assuming that the members of the Commission are elected by the National Assembly by a majority of more than half of the Members present.

In addition to Article 8(4), it was agreed that the Nomination Committee may hold meetings and adopt decisions with the votes of all its members, but not less than four (Article 8(4)). The introduction of this rule will ensure both a working mechanism and a balanced approach to decision-making by the nomination committee entrusted with the responsible task of selecting for eligibility and recommending the assessment of Commissioners-designate.

On 11 July 2025, the 51st National Assembly adopted a Decision adopting the Rules of Procedure of the Nomination Committee and conducting a nomination procedure, examination of nominations and election of members of the ACC, adopted on 11 July 2025 (published in SG No 58 of 2025).

The guarantees for the functional independence of the Commission are contained in the ACA and mainly in Chapter Two of the Act.

One of the main guarantees for the independence of the Commission is the fact that its members are elected by the National Assembly, which is the most widely represented body directly elected by citizens and expressing their will and sovereignty.

At the request of 49 MPs from the 51st National Assembly, Constitutional Case No 13/2025 was initiated on 6 October 2025 to establish the unconstitutionality of Article 8(4) and Article 9(8) and (9) of the Anti-Corruption Act (published in SG No 84/2023; last amended and supplemented. SG No 57 of 2025; ACA) and of the Decision on the adoption of the Rules of Procedure of the Nomination Commission and the conduct of the nomination procedure, examination of nominations and election of members of the Anti-Corruption Commission, adopted by the 51st National Assembly on 11 July 2025 (published in SG No 58 of 2025).

By order of 18 November 2025 in Case No 13/2025, the Constitutional Court granted the request for an examination of the merits.

In the Ministry of Interior, the leaders are not allowed to interfere in the investigation. Investigative bodies take their decisions independently and solely on the basis of the law, acting under the direction and supervision of the prosecutor, whose written instructions are binding. Disciplinary investigative bodies in cases of corruption act independently, objectively and subject only to the law, being responsible for the timely and lawful performance of their functions. In order to ensure independence in the fight against internal corruption, the Internal Security Directorates and the Inspectorate are directly subordinated to the Minister of Interior.

19. Information on the implementation of measures foreseen in the strategic anti-corruption framework (if applicable). If available, please provide relevant objectives and indicators.

Please see below information provided by the ISJC on the question "*Updated information on the activities and meetings of the National Council on Anti-Corruption Policies*"

In implementation of the strategic framework for combating corruption, enhancing the integrity of the judiciary in 2025 (until 30 April 2025, when the judgment in Joined Cases C-313/23, C-316/23 and C-332/23 of the CJEU was adopted, which limited the exercise of the powers of the ISJC under Article 54(1)(6) and (8) of the JSA), 6 inspections were opened under Chapter Nine, Section Ib of the JSA – checks on integrity and conflict of interest and to identify actions that undermine the prestige of the judiciary and checks related to violations of the independence of judges, prosecutors and investigators, of which:

- 1 inspection opened in 2024 was completed in 2025 with a proposal under Article 312(1)(3) of the JSA to initiate disciplinary proceedings to impose a disciplinary penalty on a judge for a disciplinary offence under Article 307(3)(3) in conjunction with Article 175k(4) of the JSA;

- 4 inspections (one opened for an infringement under Article 175k(3) of the JSA against a judge; two opened for infringements under Article 175k(4) of the JSA against judges and one opened for infringements under Article 175k(3) and (4) of the JSA against a prosecutor) have concluded with decisions terminating proceedings for lack of sufficient evidence of an infringement under Article 175k of the JSA;

- 1 inspection initiated for an infringement under Article 175k(4) of the JSA against a judge has been concluded with a decision terminating the proceedings on grounds of inadmissibility in view of the existence of disciplinary proceedings already initiated against the same magistrate for the same act;

- 1 inspection opened for an infringement under Article 175k(4) of the JSA against a prosecutor has been concluded with a decision to send the materials on it to the superior administrative head and to the Minister for Justice, with a view to assessing the exercise of the powers under Article 312(1)(2) and (4) of the JSA.

Under the proposal under Article 312(1)(3) of the JSA, made before 30 April 2025, disciplinary proceedings were initiated before the judicial chamber of the SJC, which had not been concluded by 5 January 2026.

Measures within the remit of the ACC from the Roadmap for the Implementation of the National Strategy for Prevention and Counteraction of Corruption in the Republic of Bulgaria (2021-2027) continued to be implemented in 2025. For example:

As regards Priority 5, Measure 5. 'Building on the activity of preparing anti-corruption plans and preparing a methodology for assessing the effectiveness of the implementation of anti-corruption plans', in order to build on the activity of developing anti-corruption plans by the ACC in 2025, a Report on the analysis of anti-corruption plans of first and second-level spending units for 2025 and a Report on the analysis of the reports on the implementation of the anti-corruption plans for 2024 were prepared.

With regard to Priority 1, Measure No 6 'Promoting *activities to increase transparency in the activities of the executive authorities*', the 'Internet Reception Room' continues to operate on the ACC website, enabling electronic queries by stakeholders on the application of the ACA, with a total of 163 queries received for 2025.

An electronic form for reporting corruption and/or conflict of interest is also maintained on the website. In addition, information on the submission of declarations of assets and interests, the activity of identifying conflicts of interest, as well as draft legislation on corruption risks agreed by the ACC, is regularly published under the heading 'Updated'.

The anti-corruption plans of the Ministry of Interior are prepared in accordance with the national strategy and published online, including identified corruption risks, measures, deadlines and responsible structures, as well as information for reporting. A variety of reporting channels are supported, including a mobile application (since 2023), with all reports checked immediately. In June 2025, a new Integrity Testing Instruction was adopted, in which 128 tests were performed with 42 violations identified. Regular trainings on integrity and anti-corruption standards continue, and administrative services are improved through unified information, annual satisfaction assessments and corrective measures. A key element in prevention remains the electronicization of services, and currently 77 electronic administrative services are available through the portal of the Ministry of Interior.

The Prosecutor's Office implements the measures of the Roadmap to the National Strategy for Prevention and Counteraction of Corruption through active institutional interaction, participation in interdepartmental working groups to optimize the investigation of corruption crimes and systematically improve the qualification of prosecutors and investigators through trainings and seminars.

B. Prevention

☐ No developments

☒ If there have been developments related to the prevention of corruption, please specify which, in particular regarding topics listed below: ...

Relevant topics to be covered in your contribution include:

20. Measures to enhance integrity in the public sector (including as regards incompatibility rules, revolving doors, codes of conduct, ethics).

A Code of Conduct has been drawn up to enhance the integrity of public officials in the central executive. The information is given under item II.2. (see Annex 6)

In order to enhance integrity in the judiciary and prevent corruption, the ISJC also prepared an Analysis of Good and Bad Practices on Ethics Compliance in 2025, in line with the relevant European and international standards in relation to inspections under Sections Ia and Ib of Chapter Nine of the Judicial System Act 2024.

The analysis was published on the ISJC website at: <https://www.inspectoratvss.bg/bg/page/16>

The analysis highlights the need for legislative changes to unify JSA and Anticorruption act declaratory regimes, expand information collection mechanisms, give the ISJC powers to analyse and assess corruption risk and strengthen inter-institutional data exchange. Emphasis is placed on the need for electronicization and automation of declaratory processes, development of ethical codes and introduction of mandatory trainings in ethics. The proposed measures aim at increasing professionalism, integrity and public trust in the judiciary and at countering corruption and conflict of interest more effectively.

In 2025, the Anticorruption Commission expanded its activity of identifying conflicts of interest. With the adoption of the Anti-Corruption Act (ACA), the Commission was given a new power: checking alerts related to declarations of incompatibility of public office holders. In the event of a finding of incompatibility, the CDD shall refer the matter to the competent authority for selection or appointment to take the necessary action.

As part of efforts to enhance integrity in the public sector, the ACC provided 163 responses to specific enquiries from stakeholders on the application of the ACC.

In 2025, ACC representatives actively participated in two key inter-ministerial working groups: 1/Prime Minister's Working Group tasked with analysing the necessary legislative changes in relation to the implementation of OECD recommendations and reforms under the NRRP and 2/Working Group with the Minister of Economy and Industry, established to prepare a draft Code of Ethical Conduct for Employees in State-Owned Enterprises.

21. 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).

In 2025, the Inspectorate to the Supreme Judicial Council continued to carry out inspections under Chapter Nine, Section Ia JSA of declarations of assets and interests submitted by judges, prosecutors and investigators, and by those who have lost the status of judge, prosecutor or investigator.

As at 31 December 2025, the ISJC had received 4 476 declarations of assets and interests under Article 175a(1)(1) of the JSA, including:

- 4 236 annual declarations for 2024;
- 109 introductory declarations (within one month of taking up duties);
- 74 final declarations (within one month of dismissal) and
- 57 final declarations (within one month of one year of dismissal).

As of 31.12.2025, checks on 4 354 asset declarations had been completed. In the course of the inspections, a comparison was made between the declared circumstances of the assets of judges, prosecutors and investigators, their spouses or cohabitants, as well as minor children, and the information obtained from the relevant registers in which the declared circumstances are to be entered, declared or certified. In fact, the assets of 9 941 persons, including the balances on their bank accounts, were checked.

In 4 068 of the declarations examined, a correspondence was found between the facts declared and the information received. 286 declarations established a discrepancy between the facts declared and the information received, 285 of which resolved the discrepancy in accordance with Article 175g(2) of the JSA by submitting a corrective declaration within 14 days of notification. In one declaration, the non-compliance was not remedied because no corrective declaration had been submitted within the time limit laid down in Article 175g(2) of the JSA.

As of 31 December 2025, the checks on 122 asset declarations had not been completed, as not all information had been received from the authorities and institutions to which the facts declared were subject to registration, disclosure or certification, and the 6-month time limit under Article 175e(1) of the JSA for carrying out the checks had not expired.

In 2025, the ACC as well continued its policy of raising public awareness and disseminating information by publishing reports, decisions and other information on its main business lines on its website.

In order to ensure the publicity of the assets, income and interests of persons holding public office, the ACC continued to carry out this activity effectively, despite the significantly expanded scope of persons by the ACC, through the inclusion of new categories of public office. This has led to an increase in the number of debtors, increased by more

than 50% (from around 10 430 to around 16 700) and a correspondingly higher number of declarations of assets and interests. It should be noted that this change to the PCA did not disrupt the workflow and the Commission continues to check every declaration of assets and interests submitted.

In order to ensure publicity and transparency, the Register of public office holders is available on the Commission's website. The submitted declarations of assets and interests, the list of persons who have not submitted declarations within the statutory deadline, as well as declarations under Article 61(1) of the ACA, which have corrected omissions and errors in the declared circumstances, are published. Access to this data is extremely important because, in addition to the Commission, it also exercises public control over the income, assets and interests of the people at the 'high level of power'.

As a result of the overall process of acceptance and analysis of declarations of assets and interests, the ACC provides information and clarity on the property status not only of public office holders, but also of their family members. The declaration system makes it possible to trace the assets with which the person enters the public office by submitting an introductory declaration. The obligation to submit a declaration annually tracks both the property acquired during the year (the legal grounds and the origin of the means of acquisition) and the income available to the person (including labor income and income from other sources). By submitting a final declaration by the obligated persons, the assets available to the persons upon dismissal from public office are also traced. Thus, the Commission receives information on enrichment of the person in the period from the occupation of the public office until its dismissal. Through the Register of persons holding public office, which is public, any citizen/media can access information about the declared property, as well as report in cases where there is a discrepancy in the lifestyle and opportunities of the person. The objectives of public control and transparency of the assets of any person holding/holding a public office and members of his/her family are therefore achieved. In this way, the cycle of monitoring, verification and control under the conditions of ensured publicity, over the property status and interests of public office holders is also closed.

In order to provide practical assistance to public office holders in fulfilling their obligations related to the completion and submission of declarations of assets and interests under the ACA and in relation to the introduction of the euro as the official currency in the Republic of Bulgaria as of 1 January 2026 pursuant to Council Decision (EU) 2025/1407 of 8 July 2025 on the adoption of the euro by Bulgaria as of 1 January 2026 (OJ L 2025/1407 of 14 July 2025), the Commission updated the validated templates for the declarations and adopted the 'Guide to the completion and submission of declarations of assets and interests under the ACA'.

The Commission continues to provide detailed statistics and reporting in the Annual Report on its activities, which it submits annually by 31 March to the National Assembly, the President of the Republic and the Council of Ministers, the report is published on the Commission's website.

Further in 2025, 2 audit reports on audits carried out on the financial activities of political parties and 3 audit reports on the financing of election campaigns were adopted by decisions of the Court of Auditors.

The audit reports are available on the Court's website:

https://www.bulnao.government.bg/bg/documents/15039/Partii_Oditen_doklad_GFO_2023.pdf;

https://www.bulnao.government.bg/bg/documents/15556/OD_PP-2024.pdf;

https://www.bulnao.government.bg/bg/documents/15083/OD_izbori_NS_09062024.pdf;

https://www.bulnao.government.bg/bg/documents/15342/OD_izbori_NS_27.10.2024_08.2025.pdf;

https://www.bulnao.government.bg/bg/documents/15096/OD_0600200924_EP-Sait.pdf.

In 2025, the President of the Court of Auditors issued 10 (ten) penalty notices for violations of the Electoral Code. The infringements were detected in the course of audits carried out on the conformity of the declared revenue and the expenditure incurred in connection with the election campaigns of the participants in the relevant type of elections. The total amount of the fines imposed is BGN 30 000, which is equivalent to EUR 15 338.76.

22. 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).

According to the information available to the Inspectorate-General, between 1 January and 15 December 2025, the inspectorates (including the Inspectorate-General) carried out:

2 962 checks on the timely submission of declarations of incompatibility and the veracity of the facts and circumstances declared in the declarations submitted under Article 49(1)(1) and (3) of the ACA;

a total of 5 730 declarations of incompatibility and changes in the circumstances leading to incompatibility were checked (Article 49(1)(1) and (3) of the ACA);

22 015 checks for the timely submission of declarations of assets and interests under Article 49(1)(2) of the ACA;

39 506 checks carried out in total for the timely submission of declarations of assets and interests under Article 49(1)(2) of the ACA;

226 checks on reports of corruption violations;

160 checks to establish a conflict of interest, of which 1 person was found to have a conflict of interest;

20 administrative infringement notices issued as a result of failure to submit declarations within the prescribed period;

20 warnings issued under Article 28 of the Administrative Violations and Penalties Act (AVPA);

1 number of terminated proceedings and concluded agreements under Article 58d of the AVPA;

7 conflict of interest proceedings initiated, of which 1 person has been identified as having a conflict of interest and is at the stage of first instance judicial appeal;

3 staff dismissed after a court decision establishing a conflict of interest entered into force in 2025, following a check carried out by the Anti-Corruption Commission;

5 proposals for termination of the legal relations of employees due to established incompatibility, 1 being terminated due to established incompatibility;

1 number of ongoing checks commissioned on the consistency of data in property declarations;

2 inspections carried out on the implementation of the Anti-Corruption Act;

6 warnings issued for untimely declarations.

In 2025, the Inspectorate of the Supreme Judicial Council (ISJC), in addition to the inspections carried out under Chapter Nine, Sections Ia and Ib of the JSA, took additional measures to prevent conflict of interest in the judiciary. In this context, two training sessions were organised and carried out on: "Ethical challenges in the professional and personal conduct of judges, prosecutors and investigators through the prism of SAC practice. The role of declarations on preventing conflict of interest and countering corruption in the judiciary". The trainings were attended by junior judges, prosecutors and investigators appointed in the last three years in various judicial bodies from the appellate regions in Sofia, Burgas, Varna, Veliko Tarnovo and Plovdiv, as well as inspectors and experts from the ISJC.

The trainings were carried out in implementation of the new competence of the ISJC under Article 54(1)(17) of the JSA (introduced by SG No 84/2023), which instructs the Inspectorate to organise and conduct anti-corruption trainings and trainings to strengthen the integrity and independence of magistrates. The thematic scope included various aspects of the personal, social and professional ethics of magistrates, with an emphasis on the principles laid down in the Code of Ethical Conduct of Bulgarian Judges and in the Code of Ethical Conduct of Bulgarian Prosecutors and Investigators. Specific examples of violations of the principles of independence, impartiality and decency, as well as cases of conflict of interest in the exercise of official powers and in the event of non-compliance with the requirements for recusal and self-recusal under the Civil Procedure Code, the Administrative Procedure Code and the Criminal Procedure Code were examined.

Particular attention was paid to the concepts of "private interest" and "proceeds", to the types of conflict of interest under the JSA, as well as to the grounds for recusal and self-recusal in procedural laws. The participants were acquainted with the procedure for disciplinary liability of magistrates and with the specifics of disciplinary proceedings. An important focus was placed on the legal bases for the declaration, the types of declarations and the deadlines for their submission, as well as on the most common errors in their completion, how to avoid them, the verification procedures and the consequences of non-compliances found. The role of the declarations as a tool to prevent conflict of interest and to counteract corruption in the judiciary was emphasized.

The trainings are part of the overall strategy of the ISJC to enhance the integrity of magistrates and to promote high standards of independence, ethics and professionalism, which are the basis of trust in an effective and fair judicial system. They continue the implementation of the second indicator of the measure entrusted to the ISJC ‘Strengthening the role of the Inspectorate to the Supreme Judicial Council for the Prevention and Counteraction of Corruption in the Judiciary (Q4/2022)’, set out in Reform 2: “Countering Corruption” from the National Recovery and Resilience Plan.

The ACC, through the Conflict of Interest Directorate, carries out checks to establish the existence or absence of a conflict of interest of the persons referred to in Article 6(1) of the ACA on alerts, by collecting, processing and analysing documents and evidence. The work of the ACC under the heading ‘Conflict of interest’ is fully public, with all decisions identifying a conflict of interest or lack thereof, decisions resulting from incompatibility checks carried out, and all court decisions on contested ACC decisions published on its website.

In 2025, the Conflict of Interest Directorate initiated and carried out self-checks for incompatibility on 16 alerts and joint checks for conflict of interest and incompatibility on 24 alerts.

*For the three previous points, **please also provide information and figures on their application/enforcement, such as number of detected breaches/irregularities of the various rules in place and the follow-up given (investigations, sanctions, etc.).***

In 2025, the ISJC initiated 33 administrative criminal proceedings (ACP) in connection with infringements of the obligation to submit declarations of assets and interests under Article 175a(1)(1) of the JSA within the statutory time limits, of which:

- 6 are against magistrates (1 judge, 3 prosecutors, 1 junior prosecutor and 1 junior investigator), who have not submitted an initial declaration of assets and interests within the time limit (Article 175c(1)(1) of the JSA);

- 22 are against magistrates (17 judges, 4 prosecutors and 1 junior prosecutor) who have not filed an annual declaration of assets and interests within the deadline (Article 175c(1)(2) of the JSA);

- 3 are against persons who have lost their magistracy status (1 prosecutor, 1 junior prosecutor and 1 investigator) who have not submitted a final declaration of assets and interests within the deadline (Article 175(1)(3) of the JSA);

- 2 are against persons who have lost the status of investigator, who have not submitted a final declaration of property and interests within the time limit (Article 175, paragraph 1, item 4 of the JSA).

As of 31.12.2025, 32 ACPs have been completed with the issuance of:

- 4 penal decrees totalling BGN 1 900. Two of the penal decrees have entered into force and one has been appealed to the court and the court proceedings have not been concluded. The last of the issued penal decrees was not served on the offender due to the failure to find him at the known addresses. The fines imposed under the penal decrees that have entered into force amount to a total of BGN 1000, of which BGN 700 have been paid;

- 21 warnings under Article 28 AVPA due to the minority of the case;

- 1 a resolution terminating the administrative penal proceedings on the grounds that the act for which the act establishing an administrative offence has been drawn up does not constitute an administrative offence within the meaning of Article 6 of the AVPA, and

- with the conclusion of 6 agreements under Art. 58d of the Administrative Violations and Penalties Act (AVPA) with a total amount of the imposed fines of BGN 1,260, which have been paid in full.

One ANP is to be decided by the penal authority.

The ACC carries out a full and comprehensive examination of each submitted declaration of assets and interests. In 2025, the ACC continued the acceptance and verification of declarations of assets and interests by public office holders, detailed in Annex 8.

23. Measures to ensure whistleblower protection and encourage reporting of corruption, including their application (i.e. number of reports received, and the follow-up given).

For the period from 1 January 2025 to 31 December 2025, the ISJC has not received reports of breaches falling within the scope of Article 3 of the Protection of Persons Whistleblowing or Publicly disclosing Information on

Violations Act (published in SG No 11 of 2 February 2023, in force since 4 May 2023, last amended in SG No 88 of 20 October 2023).

On other side anyone who has evidence of corruption or conflict of interest within the meaning of the ACA for a public office-holder may report to the ACC. Alerts may be submitted in person or through a proxy lawyer.

The requirements of the Law on the Protection of Persons Whistleblowing or Publicly Disclosing Information on Violations shall apply to the manner of reporting, their form and content, as well as the handling thereof.

Alerts may also be received from all internal or external reporting channels under the Protection of Persons Reporting or Publicly Disclosing Information on Violations Act.

Alerts on breaches that do not constitute corruption or a conflict of interest shall be forwarded to the central authority for external reporting, which shall be notified to the whistleblower.

In 2025, the ACC received 1 alert requesting protection and, in view of the allegations, the Commission referred the matter in writing to the Ministry of the Interior for assistance on the basis of Article 68 of the Act.

24. 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

The ACC carried out another year's analysis and produced reports on 'Analysis of the 2024 implementation reports of the primary and secondary spending units' and 'Analysis of the 2025 anti-corruption plans of the primary and secondary spending units'. The reports are published on the ACC website at: <https://www.caciacf.bg/bg/prewencija-na-korupcijata/dokumenti>.

In relation to corruption prevention activities, the ACC continued to coordinate each draft law prepared by the executive authorities on the existence of a corruption risk, with 96 draft laws having been agreed by the ACC in 2025.

Information on the measures applied in the Ministry of the Interior in the identified areas of increased corruption risk is presented under the question 'Development in relation to the identification of sectors most exposed to corruption risk (e.g. public procurement, road infrastructure, health care), including the adoption of measures to mitigate these risks'.

Specific measures in the field of the protection of the financial interests of the European Union (EU), including with a view to preventing corruption and conflict of interest, shall be applied in the monitoring and implementation of the Recovery and Resilience Plan of the Republic of Bulgaria. The authorities and bodies responsible for the implementation of the RRP of the Republic of Bulgaria and their main functions are set out in Council of Ministers Decree No 157/2022, promulgated in SG No 54 of 12 July 2022. Measures for the protection of the EU's financial interests, including with regard to the prevention, detection and correction of cases of corruption, conflict of interest and fraud, are set out in the Management and Control System of the Recovery and Resilience Plan, approved pursuant to Article 4a(4) of Council of Ministers Decree No 157/2022 by the Deputy Prime Minister and Minister of Finance. These measures include checks on public procurement procedures for investments from the RRP that are in a wide variety of sectors of public life – transport, health, financing of small and medium-sized enterprises, energy efficiency, culture, etc. The checks use the European Commission's single data-mining and risk-scoring tool ARACHNE to monitor and assess risk. Where evidence leads to a substantiated suspicion of fraud, corruption or conflict of interest, the information shall be submitted to the competent authorities. In the case of established data on possible violations of the Public

Procurement Act, the the Management and Control System of the Recovery and Resilience Plan stipulates that, on the basis of this information, the Minister of Finance commissions a financial inspection by the State Financial Inspection Agency.

The Management and Control System of the Recovery and Resilience Plan is publicly available on the website of the Ministry of Finance <https://www.minfin.bg/bg/1573>.

II. With regard to the activities of the Public Procurement Agency (PPA)

In accordance with the statutory powers laid down in Article 229 of the Public Procurement Act, in 2025 the Public Procurement Agency(PPA) carried out activities to improve the quality of procedures and promote competitive and transparent procurement practices relating to:

2.1. Implementation of the measures included in reform C.10 R.10 ‘Public procurement’ of the National Recovery and Resilience Plan (NRRP), outlining the main orientations for continuing efforts to increase the transparency of the public procurement process and the level of competition.

2.1.1. Phase 244 ‘Methodology of the Public Procurement Agency’ on changes in the PPA methodology (increased weight of the risk factor for procurement procedures supported by EU funds; new risk factors have been introduced in the selection of control procedures and reporting templates and the procedure for publishing control results) – see the link to the Public Procurement Portal (PPP) on the results of the checks carried out - <https://www2.aop.bg/predvaritelen-kontrol/sedmichen-bulletin/> and stage 245 ‘Standard e-procurement forms’;

2.1.2. on the basis of Article 21 of Regulation (EU) 2021/241, activities were renegotiated and the deadline for implementing reform C10.R10 ‘Public procurement’ was renegotiated.

The reform has been extended until the second quarter of 2026. A new milestone 245a Public procurement measures has been introduced, which provides for:

- entry into force of legal acts introducing an obligation for contracting entities to publish annual indicative procurement plans in the centralised automated e-procurement information system (CAIS);
- the publication of a report by an independent organisation analysing the possibilities for centralisation of public procurement procedures and options for pilot projects, as well as recommendations for action;
- publishing guidelines on the application of public procurement procedures;
- provision of procurement training for staff of contracting authorities;
- PPP publication of a list of letters to contracting authorities four times a year, based on the monitoring of the public procurement market.

The renegotiation of the Plan also changed the target values of indicators on single-bid contracts and negotiated procedures without publication.

2.2. In addition to legislative initiatives, non-legislative measures are being taken to promote transparency and competitiveness in the public procurement process, including:

2.2.1. conducting monitoring of the public procurement market, the main efforts being aimed at increasing the transparency of the actions of contracting authorities in the award process, with the aim of reducing the number of contracts concluded as a result of a single tender and negotiated procedures without publication. Regular information on contracts concluded on the basis of one tender received and negotiated procedures without publication continues to be published at the PPAct in 2025: <https://www2.aop.bg/politiki-i-strategicheski-dokumenti/npvu/tekushto-nabludenie-na-pazara/>. In connection with the monitoring of the market and the interaction between the authorities in the public procurement system, the PPA sends to the authorities for ex-post control of the implementation of the Public Procurement Act and the Commission for Protection of Competition information about the contracting entities with the highest share of contracts concluded as a result of negotiated procedures and on the basis of one tender received following a competitive procedure, for carrying out checks. As a result of the summary information, the PPA prepares a report to the Minister of Finance with proposals for measures (Article 229a of the PPAct).

2.2.2. Periodically addressing contracting entities with the highest share of contracts concluded on the basis of one tender received, as well as negotiated procedures without publication by the PPA The letters contain recommendations to avoid non-competitive practices and guidelines for the application of lawful award procedures and techniques. They refer to the methodological guidelines, technical instructions and video materials issued by the PPA.

2.2.3. Activities for professionalization of the persons involved in the public procurement process, with the assistance of lecturers from the PPA. The trainings are organised by the Institute of Public Administration (IPA) within the framework of the EU Funds Academy project, under a signed Cooperation Agreement between the Public Procurement Agency and the Institute of Public Administration. The expected effect of the trainings is to increase the understanding of the contracting authorities of the applicable legislation in the field of public procurement and to improve their knowledge and skills, which will contribute to minimising the risk of errors and will better ensure the legal award of public contracts in the country.

So far, more than 400 employees from different public authorities have been trained, and between the PPA and IPA it has been agreed to develop a total of 9 thematic modules on topical topics related to the implementation of legislation in the field by 2029.

2.2.4. Conducting targeted meetings with various contracting authorities, including participation in discussion forums such as the IPA Public Procurement Authorities Network, consultations and trainings in response to invitations received from public procurement authorities, etc.

II.2. Other significant developments from January 2025 to the date of submission of this information:

2.1. In the context of the review of the public procurement directives, the PPA carried out a survey of central government contracting authorities, managing authorities of programmes financed by EU funds, sectoral contracting authorities and other public sector organisations on a number of issues concerning the scope for improvement of the legal framework in the field of public procurement. The results and proposals, including in terms of transparency and publication of information, were summarised and sent to the European Commission services for information.

2.2. PPA prepared a project proposal under the EU Technical Support Instrument on "Development of a concept for professionalisation in public procurement and measures to improve the quality of procurement procedures and competition in the market". The aim is to increase the interest and participation of economic operators in public procurement through the implementation of the project, to improve the quality of award procedures and the efficient use of public funds of national and European origin, having an overall positive effect on the functioning of the public procurement market.

The PPA's project proposal was approved by Council of Ministers Decision No 728 of 30 October 2025 approving a list of priority requests for 2025 to receive support under the EU Technical Support Instrument in Bulgaria.

25. 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)

Key initiatives continued in 2025 and new ones were initiated to improve regulatory policy in the area of administrative burden reduction, including in sensitive areas such as environment, energy, construction, etc. Firstly, in 2025, the implementation of the Administrative Burden Reduction Plan adopted by Council of Ministers Decision No 233 of 2024 continued. The plan includes a total of 235 measures providing for amendments to 91 laws, grouped into the following main strands: the removal of required documents, the ex officio collection of information, the regulatory establishment of the procedures for the provision of services, the reduction of deadlines, as well as the improvement of the registers and the increase of their usability. These directions have a direct preventive and anti-corruption focus on the regimes (licence, registration, permits and notification) and other administrative procedures detailed in Annex 9.

According to the Guidelines for drawing up anti-corruption plans, as amended and supplemented on 21 January 2021, adopted by the National Council on Anti-Corruption Policies, the heads of primary and secondary budget spending units are obliged to approve the anti-corruption plan (AP) of the respective department. It should include anti-corruption measures based on specifically identified risks, including in sectors with increased vulnerabilities such as the environment, energy, construction and the provision of administrative services. To ensure publicity and transparency, anti-corruption plans and reports on their implementation are published in the 'Anti-Corruption' section of the website of the relevant department.

The Commission for Prevention and Counteraction of Corruption (ACC) conducts an annual analysis of the compliance of the published anti-corruption plans and the reports thereto with the requirements of the Guidelines. The analysis for 2025 found that in area 3 'Corruption risk – provision of administrative services, concessions, issuance of

licences and authorisations, registration regimes’, a total of 57 corruption risks were identified, for which corresponding 57 measures were planned.

Based on these data, the ACC 2025 report summarises the following main risk categories: non-application or divergent practice in the application of legal provisions; lack of up-to-date, public and accessible information; unregulated relationships between employees and customers; reduced quality and inefficiency of administrative services; undue payment or aggravated conditions of access to services; subjectivism and external influence in decision-making; lack of effective control over the activities of employees; and specific corrupt practices, including abuse of office, trading in influence, submission of false documents, delay of files, circumvention of the principle of randomness in the allocation of applications, etc.

Detailed information on the specific measures included in the anti-corruption plans of individual agencies, as well as reports on their implementation, is available on the websites of the institutions concerned under the heading ‘Anti-corruption’.

C. Repression measures

☐ No development in the fight against corruption

☐ In case there are developments related to the fight against corruption, please indicate which ones, in particular with regard to the points listed below:

The relevant points that your contribution should cover are:

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

Important amendments¹² have been made to the Criminal Code, the CPC and the Administrative Violations and Penalties Act (AVPA).

On 18 July 2025, the National Assembly adopted the Act amending the Criminal Code (published in SG No 61 of 29 July 2025, in force as from 31 October 2025) amending the constituent elements of the offence of bribery in order to cover any use of the official’s official position, regardless of whether it falls within the authorised competence of the official or goes beyond it, in connection with which an undue advantage has been accepted or requested. In line with the amendments made, the requirement for the prior consent of the official for bribery to be promised, offered or given for the benefit of third parties has also been deleted. In addition, the criminal liability regime and the level of criminal sanctions provided for in cases where the compositions, basic and qualified, of passive and active bribery are carried out by a foreign official with those in which the bribery is carried out by a local official, have been harmonised.

New amendments to the Criminal Code this year also explicitly introduced the obligation to verify the financial aspects of the criminal offence giving rise to prosecution and to question third parties related to those financial aspects. Rules on the identification and tracing of property have also been further developed by establishing a procedural order for the systematic conduct of parallel financial investigations in cases of crimes generating criminal funds. In addition, a procedural legal order has been created to protect the rights of third parties in the event of seizure and confiscation of their property. This creates safeguards for the ability of those persons acting in good faith to protect their rights and legitimate interests. Third parties acting in bad faith, on the other hand, are explicitly mentioned in the Criminal Code.

Some of the legislative changes create a legal framework that has a direct impact on the powers and activities of the Prosecutor’s Office, which also necessitates the introduction of changes in the accountability of the PPO.

With regard to the crime of bribery, the amendments to the Criminal Code align the criminal liability regime and the level of criminal sanctions in cases where the basic and qualified compositions of passive and active bribery are carried out by a foreign official within the meaning of Article 93(15) of the Criminal Code with those carried out by an official within the meaning of Article 93(1) of the Criminal Code. For this purpose, in the composition of the offences under Article 301(1) to (3), Article 304(1) to (3) of the Criminal Code, the entity is an official or a foreign official.

¹² Publisher: SG No 61 of 2025, SG No 65 of 2025, SG No 97 of 2025

The regulation on the institution of confiscation of property under Article 53 of the Criminal Code in favour of the State, including by a third party acting in bad faith, has been supplemented.

The changes set out a new Chapter 1a – Terrorism, covering in the first section the actual terrorist offences criminalising the acts of terrorism themselves, and in the second, non-genuine terrorist offences relating to earlier preparatory stages (preparation, recruitment and training of terrorists), accompanying and supporting activities (financing, organised crime, travelling for the purpose of terrorism, personal hiding of a terrorist, etc.), as well as acts related to the threat of terrorism (invitation).

The amendments to the CCP introduce the principle that the liability of a legal person in the event of a criminal offence (referred to in Article 83a(1) or (2) of the AVPA) is incurred in criminal proceedings brought against a natural person accused of the offence committed. It is envisaged that the proceedings against the legal person will be initiated on the basis of a reasoned proposal by the prosecutor. A legal person in respect of which there are grounds for imposing a sanction under Article 83a of the AVPA shall participate in the court proceedings, in a procedural capacity, an interested legal person.

A new Chapter Ninth "a" has also been introduced, regulating the legal framework for the participation in criminal proceedings of third parties whose property is subject to confiscation under Article 53 of the Criminal Code.

The decree terminating the criminal proceedings is to be sent (except to the accused, the victim or his/her heirs and the injured legal person) to the Commission for Combating Corruption, the Commission for Forfeiture of Illegally Acquired Property, the State Financial Inspection Agency and the National Audit Office, where the proceedings concern corruption offences and related offences and where these authorities have reported the crime committed.

The Prosecutor General may also revoke the decision terminating the criminal proceedings after the expiry of the time limit laid down in Article 243(10) of the CCP only in cases expressly provided for (new paragraph 11).

Amendment and supplement to the Code of Criminal Procedure, promulgated in SG No 65 of 8 August 2025 amended the time limits for carrying out the investigation and for supervision measures (Article 234 of the CCP).

The amendments and supplements to Chapter Four ‘Administrative penal sanctions against legal persons and sole traders’ of the AVPA (published in SG No 61/2025, in force as from 29 July 2025) are consistent with the amendments to the Criminal code and the CCP.

The additions introduced in Chapter 1 ‘a’ of the Criminal Code have also been reflected in the Act amending the Public Procurement Act (published in SG No 61/2025, in force as from 31 January 2026).

In connection with the above, the current accountability mechanisms and their update are discussed in the Prosecutor's Office.

27. Official data on the number of investigations, prosecutions, final judgments, and the application of sanctions for corruption offences (differentiated by offence if possible)¹³. Please indicate whether the cases: involve legal persons; are related to the implementation of EU or national funds¹⁴; involve high level corruption. Please indicate which data is publicly available and how policy-making is informed by the data.

A total of 25 criminal cases were brought before the Supreme Court of Cassation (SCC) in 2025 concerning offences listed in Annexes 1 and 2 to [Order No 773/01.09.2025](#) of the President of the SCC, as amended by [Order No 109/14.02.2024](#) and [Order No 773/01.09.2025](#). Of these, 3 are against persons holding senior public positions (under Article 6 of the Anti-Corruption Act).

A total of 18 criminal cases for corruption offences (including proceedings initiated in previous years) were decided in the Supreme Court of Cassation in 2025. Of these, 5 are against senior public officials.

¹³ Please include, if available the number of (data since 2022 or latest available data): indictments; first instance convictions, first instance acquittals; final convictions; final acquittals; other outcomes (final) (i.e. excluding convictions and acquittals); cases adjudicated (final); imprisonment / custodial sentences through final convictions; suspended custodial sentences through final convictions; pending cases at the end of the reference year.

¹⁴ For MS participating in the EPPO, data on cases related to EU funds does not encompass investigations and prosecutions carried out by the EPPO.

The corruption cases, the movement of which in 2025 is traced in this information, are a total of 36 cases initiated both in 2025 and in previous years, 7 of which are against senior public office holders.

Please see the attached information on the movement in 2025 of corruption cases in the Supreme Court of Cassation, which contains specific data for each of these cases. – Annex 1.

Sections are maintained on the website of the Supreme Court of Cassation, under the heading ‘Judicial practice’: ‘Crime cases of corruption’, ‘Organised crime cases’ and ‘Register of cases against journalists and media’. In them, on a quarterly basis, up-to-date lists of cases of the relevant type are published, both in the SCC and in the courts of appeal districts, as well as the court decisions of chambers of the SCC after their announcement.

Also in the section ‘Judicial practice’, in the section ‘Investigation notifications of the Prosecutor General or his/her deputy’, information is published on the reports received by the Head of the Criminal Chamber of the SCC under Chapter thirty-first ‘a’ of the CCP concerning investigations against the Prosecutor General or his/her deputy for crimes of a general nature.

In the annexes hereto, we present data on cases initiated for corruption offences¹⁵ (Annex 1), from which are derived data on cases initiated for corruption offences involving an alleged perpetrator – high-ranking officials¹⁶ (Annex 2), as well as for offences related to EU funds (Annex 3). Data are for the period 2024 – the nine-month period 2025.¹⁷ - see Annexes 3, 4 and 5 to this contribution.

Each annual report on the activities of the Prosecutor’s Office and the investigative bodies submitted by the Prosecutor General to the Supreme Judicial Council (and sent by the SJC to the National Assembly) analyses in a separate section the results of cases of particular public interest – aggregated data on corruption offences,¹⁸ organised crime, offences affecting the financial interests of the European Union, trafficking in human beings, tax and financial crimes, drug trafficking.

Every first six months of the year, pursuant to Article 138(1)(12) of the JSA, the Public Prosecutor’s Office prepares summary information on the opening, movement and closure of files and cases in the Public Prosecutor’s Office of the Republic of Bulgaria (PPO). In synthesized form, in numerical values and graphically according to basic indicators, the activity of the Prosecutor’s Office in the performance of its main legal functions is presented. In a separate section, data on the formation, movement and results of cases of particular public interest are displayed and analyzed. The information is provided to the Prosecutorial College of the SJC, the Inspectorate to the SJC and the Minister of Justice.

For the first quarter, first semester, nine months and yearly, pursuant to point 34.3 of Section VI of the Instruction on the organisation of information activities in the Public Prosecutor’s Office on reporting on the work of the Prosecutor’s Office in combating corruption and organised crime, the Prosecutor General and his/her deputies shall be provided with a Report on cases initiated for corruption offences¹⁹ committed by high-ranking officials and others holding positions of responsibility in state and municipal institutions, a Standardised Analytical Report on the Status of Corruption Crime Cases²⁰ and a Standardised Analytical Report on the Status of Organised Crime Cases. The presented materials enable the management of the PPO to take objective and adequate measures to provide methodological assistance in these cases.

28. 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

¹⁵ According to the Unified Catalogue of Corruption Crimes.

¹⁶ The persons referred to in Article 6(1) of the ZPK, as well as other persons holding positions of responsibility in state and municipal institutions.

¹⁷ According to the periodicity of collection and aggregation of statistical information on the activities of the Prosecutor’s Office, approved by the Ordinance on the organisation of information activities in the PDB, the data for 2025 are relevant for the nine-month period. When submitting the information under the remit of the PRB, the sixth annual Rule of Law Report presents data for the period 2023-nine months of 2024.

¹⁸ Report on the activity of countering corruption offences, prepared on the basis of Art. 84, item 16, sentence. 2 of the Constitution and Article 138a(2) – new (SG No 48 of 2023 ZSV), submitted to the National Assembly.

¹⁹ See note No 17.

²⁰ Specimens approved by Order No RD-02-03/06.01.2025 of the Prosecutor General.

In view of the short duration of the ACC's power to investigate a corruption offence under Article 3 of the ACA committed by persons holding public office, in force since 1 March 2024, no potential obstacles in legislation or practice to investigation and prosecution have been taken into account to date.

In the section on conflict of interest, the information is provided in detail above. Additional regulation is needed for the matter of incompatibility.

In each annual report on the activities of the Prosecutor's Office and the investigative bodies that the Prosecutor General submits to the Supreme Judicial Council (and the SJC sends to the National Assembly), the section 'Necessary measures and legislative changes' sets out the challenges identified by the prosecutor's offices in the country in relation to the criminal investigation, together with proposals for legislative amendments.

In the Annual Reports on the Activities of the Prosecutor's Office in Countering Corruption Crimes, submitted by the Prosecutor General to the National Assembly (bas. Article 138a(2) of the JSA, in conjunction with the second sentence of Article 84(16) of the Constitution of the Republic of Bulgaria, sets out in Section II the specific factors for the effectiveness of the pre-trial and other law enforcement authorities²¹ involved in combating corruption offences and the identified need to improve the substantive and procedural framework relevant to this matter.

Specifically, the socio-political dynamics of recent years can be pointed out as a factor, which has a direct impact on the state of the legal institutional environment: the compositions of important state (regulatory, administrative, control and other) bodies are not formed/renewed in a timely manner, respectively frequent staff changes are being made (MoI, Public financial Inspection Agency, etc.), the new composition of the Anti-Corruption Commission has not yet been elected, the relevant joint instructions provided for in the Anti-Corruption Act (Article 38(2), Article 41(2)) have not been adopted, which should govern the organisation of interinstitutional interaction.

29. 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.

State of play of legislation on transparency of interest representation and the development of the Transparency Register.

A draft law has been drawn up in line with the comments and recommendations of the OECD and the EC, as well as a draft statement of reasons. A consultation document on a draft Law on Transparency and Integrity in Governance was published for public consultation in the period 25 July - 25 August 2025.

A reply was received from the National Audit Office, ref. No 91-00-519/25.09.2025, together with a draft financial statement prepared by the National Audit Office to the Lobbying Bill, confirming the impact initially calculated by the Authority on the State budget of the construction and maintenance of the register provided for in the Bill.

The comprehensive ex-ante impact assessment, based on data from the Court of Auditors, has been finalised and sent for consultation with the Administration of the Council of Ministers. After reconciliation, the comprehensive ex-ante impact assessment was approved by the Council of Ministers without recommendations. A complete set of documents has been prepared for publication for public consultations and for interdepartmental coordination in accordance with Article 32(1) of the Rules of Procedure of the Council of Ministers and its administration.

• ***Additional question: State of play of the implementation of the national anti-corruption strategy.***

In 2025, the responsible institutions continued the implementation of the National Strategy for Prevention and Counteraction of Corruption (2021-2027). At the beginning of the year, a process was launched to gather information on the implementation of the measures of the 2023-2024 Strategy. Due to the absence of meetings of the National Council on Anti-Corruption Policies (NCAP), the implementation reports were not formally adopted.

²¹ With regard to: the dynamics in public relations, respectively in the normative and resource provision; the prevention of corruption crime; the independence, methodological direction and accountability of the Prosecutor's Office; the intensity and quality of the signalling function (referral); the specificities in the manifestation and in the mechanism of committing corruption offences, the challenges to the competent authorities; interaction between competent institutions and international cooperation.

In response to a letter from the Ministry of Justice related to the reprogramming of activities under the measure 'Fighting corruption and promoting integrity' by the Swiss-Bulgarian Cooperation Programme, the Inspectorate-General proposed in February 2025 a reformulation of the activities with a focus on improving the quality and implementation of the Strategy. Proposals include developing a new or updated strategic document, providing strategic advice and support to the Chief Inspectorate of the Prime Minister and other institutions involved, as well as establishing effective quantitative and qualitative monitoring and evaluation indicators, impact and risk assessment methodologies and other tools to measure progress.

In addition, in December 2025, the Bulgarian National Audit Office published Audit Report No 0300201223 on the performance audit 'Measures to prevent and counter corruption in the spending and management of EU funds' for the period from 1 January 2021 to 31 December 2023. With regard to the National Strategy for Prevention and Counteraction of Corruption (2021-2027), the Court made a number of recommendations that are to be discussed at a subsequent meeting of the National Council on Anti-Corruption Policies and a follow-up decision to carry out an analysis of the National Strategy for Prevention and Counteraction of Corruption (2021-2027) and update/develop a new one.

- ***Additional question: Update on the activities and meetings of the National Council on Anti-Corruption Policies.***

In order to implement the most recent recommendations received from the Public Governance Committee and the OECD Working Group on Public Integrity and Anti-Corruption (PIAC), an update of the Council's composition was undertaken through the preparation of a draft Council of Ministers Decree amending and supplementing Council of Ministers Decree No 136 of 2015 on the establishment of a National Council on Anti-Corruption Policies.

Council of Ministers Decree No 271 of 2025 amending and supplementing Council of Ministers Decree No 136 of 2015 (published in SG No 104 of 5 December 2025) resumed the work of the Council and expanded its composition to ensure the representation of all institutional actors, including representatives of the Anti-Corruption Commission and the Prosecutor's Office of the Republic of Bulgaria. Following the amendments, there are a total of 15 members of the Council, as follows: Deputy Minister for Foreign Affairs; Deputy Minister of Justice; Deputy Minister for the Interior; Deputy Minister of Economy and Industry; Deputy Minister of Finance; Deputy Minister for Energy; Deputy Minister of e-Government; Vice-President of the Supreme Court of Cassation; Vice-President of the Supreme Administrative Court; a representative of the Public Prosecutor's Office appointed by the Prosecutor-General; the Inspector General of the Inspectorate to the Supreme Judicial Council; a representative of the Anti-Corruption Commission appointed by the President of the Commission; Deputy Chairman of the State Agency for National Security; the head of the General Inspectorate of the Council of Ministers and a representative of the National Association of Municipalities in the Republic of Bulgaria.

The President of the Council is the Minister of Justice and the Secretary of the Council is the Head of the Inspectorate General attached to the Prime Minister. The President shall, by order, determine the nominal composition of the NSAP and of the Civil Council attached to the NSAP.

It is regulated that the function of the Council Secretariat is to be performed by the Inspectorate General, and in order to ensure accountability for each meeting held, the Council Secretary will draw up a proper report to the Prime Minister.

With a view to ensuring the continuity of the work of the Council, the serving members of the Civil Council shall retain their right to participate in it until a new election procedure has taken place.

- ***Additional question: Measures taken/implemented to enhance the integrity of civil servants, law enforcement agencies and the judiciary.***

By Order No R-189 of 27 October 2025 of the Prime Minister, an interdepartmental working group was set up with the task of analysing the necessary legislative changes related to the implementation of the OECD recommendations, as well as the relevant measures of Step 226a of Reform C10.R2 'Countering Corruption' of the NRRP.

The working group was composed of managers and experts from: the Administration of the Council of Ministers (Directorate for Coordination and Modernisation of Administration, Legal Directorate, Budget and Finance Directorate, Human Resources Department, General Inspectorate), Inspectorates under Article 46 of the Administration Act of the Ministry of Economy and Industry and the Ministry of Education and Science, the Corruption Prevention Directorate of the Anti-Corruption Commission, the Inspectorate of the Anti-Corruption Commission, the Training, International Activities and Projects Directorate of the Institute of Public Administration. In addition, managers and experts from the Inspectorate of the Customs Agency, the Institute of Psychology of the Ministry of Interior and the Central Coordination Unit Directorate in the Administration of the Council of Ministers were involved.

As a result of the work of the working group, a draft Act amending and supplementing the Civil Servants Act was prepared, which provides for the conditions and procedure for conducting integrity tests to be determined by a regulatory act.

The transitional and final provisions of the draft law provide for its entry into force three months after its promulgation in the State Gazette, and the same period is provided for the alignment and adoption *of the secondary legislation on the implementation of the law*.

- ***Additional question: Updates as regards the results of checks conducted by the ACC and CIAF of both declarations and actual assets held, including the verification of the extent to which assets held can be justified by a person's income.***

- Please see information provided in Annex 8.

- ***Additional question: State of play of the legislation on transparency of interest representation and development of the transparency register***

Additional question: Update as regards any measures within the reporting period aiming to improve the transparency of funding of political campaigns, as well as about the implementation of the regulatory framework.

Additional question: Information about electoral irregularities and their follow-up by the competent national authorities.

A total of 675 files were opened in connection with the parliamentary elections held on 9 June 2024. 20 files were sent under the competence of other authorities. 560 cases were decided by a decree refusing to initiate criminal proceedings.

There are 165 pre-trial proceedings. 94 pre-trial proceedings were terminated and 9 pre-trial proceedings were suspended. Three prosecutorial acts were submitted to the court (2 indictments and 1 proposal under Article 78a of the Criminal Code). Six persons have been convicted and sanctioned by a final court decision.

In connection with the parliamentary elections held on 27 October 2024, 1 155 files were opened. 15 files were sent under the competence of other authorities. 973 cases were decided by a decree refusing to initiate criminal proceedings.

152 pre-trial proceedings were initiated. 87 pre-trial proceedings were terminated and 6 cases were suspended. Four prosecutorial acts (agreements) have been submitted to the court. Four persons have been convicted and sanctioned by a final judicial decision.²²

With the highest share for both elections are the pre-trial proceedings formed for the so-called 'buying of votes' (Article 167(2) of the Criminal code) and for the exercise of the right to vote more than once in the same election (Article 168(2) of the Criminal code).

The main commitment of the Ministry of Interior is the preservation of public order for the smooth conduct of elections and preventing the violation of citizens' electoral rights. During the preparation and conduct of elections,

²² The data are presented in the Annual Report on the Activities of the Prosecutor's Office and the Investigative Bodies for 2024, extracted from the Unified Information System of the Prosecutor's Office, with actuality as of 7 April 2025.

measures shall be taken, in cooperation with the other competent authorities, to prevent, prevent and suppress violations of electoral legislation and crimes against the political rights of citizens.

In connection with the conduct of the relevant elections, an operational headquarters is established, which carries out the management of the activity of countering crimes against the political rights of citizens, ensuring security and safeguarding public order, information exchange between the structures of the Ministry of Interior during the election process, coordination with the Central election commission, the Council of Ministers, the Prosecutor's Office of the Republic of Bulgaria and the State Agency for National Security.

The activity of the Ministry of Interior to combat electoral crimes is implemented according to an approved plan with specific measures, responsible structures and deadlines for implementation. The plan coordinates the activities of the structures of the Ministry of Interior and the interaction with the competent state authorities for the prevention, prevention and detection of crimes and offences related to the electoral process.

In order to facilitate the planning and management of forces and funds during elections, a 'Geographical Information System – Electoral Processes' has been developed, which was also used in the last elections to the National Assembly on 27 October 2024. The application with an interactive map enables the tracking of incoming signals in real time, which facilitates the timely and directing of MoI forces towards areas at risk of impact, such as vote buying, corporate vote, abusive campaigning and other crimes against the political rights of citizens.

In connection with the elections held in the Ministry of Interior about a month before the date of the vote, a continuous telephone line and an e-mail address are opened through which citizens can report violations or possible crimes relevant to the electoral process.

Additional question: Developments related to reports from whistleblowers, including regulatory or institutional developments.

The Act amending the Protection of Persons Whistleblowing or publicly disclosing Information on Infringements Act, promulgated in SG No 38 of 9 May 2025, adopted a number of amendments to extend and strengthen the protection of whistleblowers, including the personal scope of protection, which were submitted to the Commission in the preparation of the sixth Rule of Law Report.

The Ministry of the Interior has established a channel for internal reporting in implementation of the Protection of Persons Whistleblowing or Publicly Disclosing Information on Violations Act. Internal rules have been established for the handling of reports of breaches of Bulgarian legislation or of acts of the European Union that threaten or harm the public interest, in accordance with the methodological guidelines of the Commission for Personal Data Protection.

In order to update the electronic services provided by the Public Prosecutor's Office of the Republic of Bulgaria, published on the Electronic Portal on the official website of the Public Prosecutor's Office, a working group was set up by order of the Prosecutor General²³ to²⁴ propose, on the basis of an analysis of the issues and difficulties raised in relation to the application of the Rules on electronic document turnover and the provision of electronic services by the Public Prosecutor's Office of the Republic of Bulgaria, a draft amendment to the rules in force.

Additional question: Developments regarding the identification of sectors most exposed to corruption risk (e.g. public procurement, road infrastructure, healthcare), including the adoption of related risk mitigating measures.

²³ Order No RD-09-124 of 2 December 2025 of the Prosecutor General.

²⁴ Approved by Order No RD-02-11 of 29 June 2020, amended and supplemented by Order No RD-02-12 of 10 July 2023 of the Prosecutor General.

Please see the information provided by the ACC on ‘Measures to prevent corruption in connection with the issuance of official permits (e.g. relating to the environment, energy, provision of services and various types of construction)’

In 2025, the implementation of the approved Methodology for Assessment and Management of Corruption Risk in the Ministry of the Interior started, and two strategic assessments were carried out in the period to map and update corruption risks in the Ministry of the Interior.

In all areas of increased corruption risk, enhanced controls are applied.

The Internal Security Directorate (ISD) of the Ministry of the Interior carries out control and monitoring through the Automated Information System ‘Video recording of security activities and road control’ in order to prevent and detect corrupt behaviour, crimes or other unlawful acts of employees of the Ministry of the Interior. In 2025, over 7 million video files with information provided in the system were reviewed. Sixty-six police officers were arrested.

Interaction and exchange of information shall take place and joint checks shall be carried out with the ISD to detect, prevent and document unauthorised links and corrupt behaviour of border police officers. In order to prevent and counteract acts of corruption of the BCP staff, video recordings are reviewed in the CCTV system at the BCP. Up-to-date information on the requirements for crossing the border checkpoint is maintained, there is an open telephone line for reporting alerts and complaints from citizens. A software application is used to rotate employees at the workplaces of larger BCPs.

Public procurement is conducted in full transparency and publicity, guaranteed both by the provisions of the Public Procurement Act and the Internal Rules for the Management of the Public Procurement Cycle at the Ministry of the Interior, and by the use of the Centralised Automated Information System ‘Electronic Public Procurement’, which provides free and unrestricted access for all interested parties. *Regular trainings* are held for employees engaged in the conduct of public procurement at the Ministry of Interior. There is a rotation of staff and committee members during the different stages of the procedures. An enhanced review of the legality of the procedures carried out shall be carried out. There is a rotation of employees of the Ministry of Interior working in areas or carrying out activities with increased corruption risk.

The Minister for Health, in his capacity as the Central Purchasing Authority for the Healthcare Sector, has put into operation an Electronic System for the Purchase of Medicinal Products, through which he conducts procedures under the Public Procurement Act and concludes Framework Agreements for their purchase. The way in which the award is organised, namely the appointment of an unlimited number of participants in the procedure as contractors, as well as the rules for the appointment of contractors on the basis of the lowest price, by conducting an automatic anonymous electronic auction, limit corruption risk.

In September 2025, a Framework Agreement was concluded with some 220 medicinal groups declared by health institutions for medicinal products paid for by the National Health Insurance Fund, beyond the cost of the medical services provided.

The above implements the specific measures to increase transparency, integrity and accountability in the health sector, as well as achieving more effective spending on medicinal products paid for by the National Health Insurance Fund, beyond the cost of the medical services provided.

The Customs Agency applies the following measures aimed at preventing corruption of employees:

- rotation of staff, which is most prevalent at border customs offices;
- conducting a survey by officials of the Inspectorate of the Customs Agency on the activities of the Bulgarian customs administration, in the performance of their functions in accordance with international standards and ethical norms of conduct - with carriers and passengers passing through the border crossing points, and with representatives of the business;
- conducting working meetings of officials of the Customs Agency Inspectorate with heads and officials of customs offices, on the prevention and counteraction of corruption and on conflicts of interest;
- training of all newly appointed officials in the specialized administration, included in the basic courses, on the prevention and counteraction of corruption.

The competence of the APO mainly includes powers of a methodological nature aimed at assisting contracting authorities in the implementation of legislation in the field, including by exercising external ex-ante

control, as well as maintaining the national electronic platform for public procurement and has no powers related to the prevention, detection and counteraction of corrupt practices. In view of the above, the relevant information on the activities of APOs with an anti-corruption effect is set out in points II.1 and II.2 above under the theme of ‘Specific measures to enhance transparency, integrity and accountability in sectors at high risk of corruption, with a view to monitoring and preventing corruption and conflict of interest, and, where applicable, measures to prevent and address corruption committed by organised crime groups’.

Other – please specify

III. Media freedom and pluralism

Please provide information, in order to follow up on the recommendations received in the 2025 Report, on the measures taken related to media freedom and media pluralism (if applicable).

Under the second payment under the National Recovery and Resilience Plan of the Republic of Bulgaria, in implementation of stage (M217) ‘Entry into force of amendments to the legal framework relating to the protection of persons who report breaches of legislation’, part of Reform K.10.R2: ‘Countering Corruption’, the Ministry of Justice drafted a Law amending the Criminal Code, which was adopted by the National Assembly and published in State Gazette No 61 of 29 July 2025. The adopted Law amending the Criminal Code reduced the special minimum fine provided for under the basic offence of insult and defamation, thus completing the legislative reform initiated in 2023 with regard to the sanctions imposed for both offences, following a series of convictions handed down by the European Court of Human Rights against Bulgaria for violations of freedom of expression (Article 10 of the European Convention for the Protection of Human Rights and Fundamental Freedoms) – e.g. the Bozhkov and Kasabova cases.

Recommendation: 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.

There were no legislative changes in this area in 2025.

A. Media authorities and bodies²⁵

☐ No development

☐ In case there are developments concerning media authorities and bodies, please indicate which, in particular with regard to the points listed below: ...

The relevant points that your contribution should cover are:

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

There were no legislative changes in this area in 2025.

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

There were no legislative changes in this area in 2025.

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

There were no legislative changes in this area in 2025.

²⁵ See Article 30 of Directive 2018/1808.

B. Guarantees against state or political interference and transparency and concentration of media ownership

☐ No development

☐ In case there are developments involving state or political interference and transparency and concentration of media ownership, please indicate which, in particular with regard to the points listed below: ...

The relevant points that your contribution should cover are:

33. Measures taken to ensure the fair and transparent allocation of state advertising

There were no legislative changes in this area in 2025.

A working group was set up with the Minister of Culture to prepare a draft Act amending the Radio and Television Act in relation to the alignment of national legislation with the European Media Freedom Act (Regulation (EU) 2024/1083).

A Permanent Expert Council on Media Literacy with the Minister of Culture is also formed under the Minister of Culture.

Bulgaria shall ensure compliance with the principle of sound financial management and control in the spending of EU funds, including for information and communication activities, in accordance with Regulation (EU) 2021/1060 and the Act on the Management funds/grants of European Shared Management Funds (ESMF). For the 2021-2027 programming period, a specific Methodology for the allocation of financial resources for visibility, transparency and communication of programmes co-financed through the ESMF has been adopted. It was approved as Annex 2 to the National Communication Strategy 2021-2027 by the Partnership Agreement Monitoring Committee on 7 June 2024.

The methodology aims to prevent concentration of resources in media of the same type and ensures equal access through competitive selection between different media sources – online, print, news agencies, etc. It introduces clear rules for the allocation and spending of communication funds and is publicly available on the Single Information Portal for EU funds:

The methodology is available on the Single Information Portal on EU Funds at the following link:

https://eufunds.bg/sites/default/files/uploads/eip/docs/2024-06/2.%20NCS%20Appendix%202_Methodology%20final.pdf.

The managing authorities shall provide the Central Coordination Unit with a detailed estimate of the planned budgets for visibility, transparency and communication within the framework of their annual action plans, respecting the requirements for share distribution and diversity of communication channels and sources and applying a mechanism for measuring the effectiveness of media campaigns with the above indicators for achieving the communication objectives.

References for the implementation of the Methodology for allocation of the financial resources for visibility, transparency and communication of the programmes co-financed through the ESMF are published regularly on a quarterly basis at the following link: <https://eufunds.bg/bg/node/16649>.

In addition, monthly reports on contracts concluded in implementation of the Annual Action Plans of the programmes for the 2021-2027 programming period and their payments are published at the following link:

<https://eufunds.bg/bg/node/16655>.

34. 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

- information on specific legal provisions and procedures applying to media service providers, including as regards granting/renewal/termination of licences, company operation, capital entry requirements, concentration, and corporate governance

35. Transparency of media ownership and public availability of information on media ownership, including direct, indirect and beneficial ownership

There were no legislative changes in this area in 2025.

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

☐ No development

☐ In case there are developments related to the framework for the protection of journalists or transparency/access to documents, state or political interference and transparency and concentration of media ownership, please indicate which, in particular with regard to the points listed below:

The relevant points that your contribution should cover are:

36. Rules and practices guaranteeing journalist's 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.

In 2025, there were no changes to the provisions on the protection of information sources in the Radio and Television Act.

All alerts submitted by the Partner Organizations to the Platform for the Protection of Journalists of the Council of Europe have been examined with attention by the competent Bulgarian authorities and a timely response has been provided to the actions taken. Based on this information, at the end of 2025, the Partner Organisations decided to flag as 'resolved' 10 alerts submitted by the Partner Organisations to Bulgaria in the period 2019-2025. The reply of the Bulgarian authorities is attached to each individual alert and is publicly available at the Internet address of the Platform for the Protection of Journalists.

In the period 2022-2025, there was an overall decrease in reports related to the protection of journalists and media freedom in Bulgaria. For 2025, 3 (three) alerts were issued, of which one was closed as 'resolved'.

The Ministry of Interior continues the established practice of communicating effectively with journalists in the interests of publicity and transparency and providing clear, timely and specific information, including on security measures taken during mass events.

Given the important role of the media in providing reliable and trustworthy information to citizens, the necessary organization for access to places and sources of information, clear, transparent and non-discriminatory accreditation procedures, participation and questioning in the framework of the held press conferences and other information-oriented events has been established.

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

The protection of journalists and ensuring their safety during protests and demonstrations is studied as a topic at the Academy of the Ministry of Interior and is part of the programme of the compulsory training course 'Preservation of public order', addressing issues related to the police's activity in ensuring the safety of journalists and media representatives covering mass and sporting events.

The topic ‘Protecting the rights of journalists in the conduct of their professional activities’ is also the subject of training at the place of work, for which purpose the Ministry of the Interior has prepared a corresponding educational content accessible to all structures in the Ministry’s internal network.

Prosecutors and investigators have the necessary capacity to guarantee the rights, legitimate interests and safety of victims, including those exercising the profession of journalist (in particular victims also during protests and demonstrations). If there are legal prerequisites, the rules on the protection of victims – witnesses provided for in the Criminal Procedure Code, Protection of Persons Whistleblowing or Publicly disclosing Information on Violations Act and JSA apply.

Upon request, the Prosecutor's Office provides information on specific cases to injured Bulgarian journalists (on the formation, movement and outcome of such cases) registered on the Council of Europe Platform for the Protection of Journalists.

36. 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).

In connection with the powers of the Directorate within the meaning of Article 77b(1)(9) of the Rules of Procedure of the Council of Ministers and of its Administration - administering the Public Consultation Portal, the Platform for Access to Public Information - in 2025 there were no changes in the legal framework and in the practice of its implementation regarding these activities.

37. 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.

The work of the working group appointed by order of the Minister of Justice continues, which should prepare proposals for regulatory changes with a view to aligning national legislation with Directive (EU) 2024/1069 of the European Parliament and of the Council of 11 April 2024 on the protection of persons who engage in public participation against manifestly unfounded claims or abusive court proceedings (‘Strategic lawsuits against public participation’/SLAPPs). Given the specificities of the framework provided for in the Directive, which proposes the introduction of new institutes for our legal system, and taking into account the specificities of our national legislation and in particular civil procedural law, the Working Party should address the challenges of introducing into national law special procedural measures to protect the defendant in strategic court proceedings against public participation – SLAPP cases, including the safeguards against abuse of procedural rights/proceedings against public participation, as well as the early termination of court proceedings with a ‘decision on the merits after an appropriate examination’ if the claim is manifestly unfounded.

The work of the working group is intensive and in-depth and the plan is to ensure full transposition of the Directive in time, so as to ensure the protection of persons engaged in public participation not only in cross-border cases against them, but also in domestic civil and commercial cases.

The Governance Programme of the Republic of Bulgaria for the period 2025-2029, adopted by Decision No 91 of the Council of Ministers of 2025, also provides for a measure ‘the approval by the Council of Ministers of a bill amending and supplementing the Code of Civil Procedure on the protection of persons engaged in public participation against manifestly unfounded claims or abusive court proceedings’.

In 2025, the Supreme Court of Cassation (SCC) continued to consistently apply established case law in cases against journalists and members of the public, upholding the necessary balance between freedom of expression (Article 39(1) and Article 41(1) of the Constitution) and the right of the person to dignity and reputation (Article 32(1) of the Constitution). The court rulings underline that the responsibility of journalists and media can only be engaged if it is

established that the facts publicly stated are both disgraceful and false. Where the statements constitute opinions or criticisms of public importance and do not exceed the limits of the permissible freedom of expression under Article 39(1) of the ECHR, the claims should be dismissed.

A key criterion for assessing whether a statement exceeds the permissible criticism of a public figure is the public importance and necessity of presenting the facts, opinion or criticism, as confirmed in a number of acts of the Supreme Court of Cassation (e.g. Orders No 2359/12.05.2025, No 3896/31.07.2025, No 5723/09.12.2025 and Decision No 460/16.07.2025).

The SCC also stresses that when journalistic reporting aims to inform the public on important topics – such as conditions in Bulgarian prisons or transparency in the public sphere – the journalist’s responsibility is not engaged (e.g. Definitions No 5686/05.12.2025 and No 5330/20.11.2025).

With regard to the forms of compensation for damage caused, the court accepted that this can be done both by monetary compensation and by removing the publication from the site of the electronic edition when it contains offensive and defamatory claims (Decision No 195/04.04.2025).

The Supreme Court of Cassation also consistently protects the right of journalists not to disclose their source of information, in accordance with Article 15(2) of the Radio and Television Act. At the trial under Articles 45 and 49 of the ZZD, it is sufficient to establish that the source exists and that the journalist has carried out a bona fide check of the accuracy of the information (e.g. Orders Nos 1166/12.03.2025 and 3307/24.06.2025).

By the end of the third quarter of 2025, 13 cases have been brought before the Civil College of the Supreme Court of Cassation against journalists and public figures, of which 4 have ended with a final court decision. The rest are scheduled for consideration in the first quarter of 2026, with the exception of civil case No 2701/2025, scheduled for 14 April 2026.

A detailed overview of the cases brought against journalists and public figures in 2025, including those opened but not concluded in 2024, can be found in the [Register of Cases against Journalists and Media](#) maintained on the SCC website. It also publishes the court decisions handed down by chambers of the Supreme Court of Cassation in this type of cases.

The PPO maintain their position, expressed in previous reports, that the lack of criminalisation of acts with a qualifying characteristic of the subject of the crime of ‘journalist’ predetermines the objective impossibility of deriving data on such cases. With regard to the offence of ‘defamation’, which, according to the Criminal code, is of a private nature, criminal proceedings are initiated on the basis of a complaint by the victim, directly before the court. As these proceedings fall outside the competence of the Public Prosecutor’s Office, we do not have information on private cases brought by individuals against journalists.

Other – please specify

Additional question: State of play of the election of the new Chairperson of the Council for Electronic Media (CEM).

By Decision No RD-05-44/22.04.2025, the Electronic Media Council elected Dr Simona Veleva as Chairperson of the CEM with effect from 28.04.2025. According to Article 31(1) of the RTA, the term of office of the Chairperson is one year.

Additional question: State of play of the appointment of a new Director General of the Bulgarian National Television (BNT).

Pursuant to Decision No 6862/23.06.2025 of the Supreme Administrative Court in administrative case No 10629/2023 and Decision No 694/30.05.2023 of the Sofia Administrative Court in administrative case No 696/2022, by [Decision No RD-05-69/15.07.2025, the Council](#) terminated the procedure for the selection of the Director-General of BNT announced in 2022, and by subsequent [Decision No RD-05-70/15.07.2025, the SEM](#) announced a new procedure for the selection of the Director-General of BNT.

Both decisions included a provisional enforcement order, which was annulled by the court on appeals from interested parties.

The decisions have also been appealed on the merits and have not yet entered into force.

Additional question: State of play – and content – of legislation to strengthen the independence of public service media.

Additional question: Updates on developments regarding media market concentration

In 2025, there were changes to the Law on Protection of Competition, but they are not specifically related to the concentration of ownership in the media market.

Additional question State of play – and outcome – of ongoing court cases regarding access to public information.

On 21 December 2021, following a request from the Minister for Justice to adopt an interpretative decision on the question 'Are judicial decisions in cases in which classified information has been applied subject to publication and how many of them?', interpretative case No 4/2021 of the General Assembly of Judges of the First and Second Chambers of the Supreme Administrative Court was initiated.

By Interpretative Decision No 2 of 14 April 2025 in the cited case, the SJC of the First and Second Chambers of the Supreme Administrative Court adopted the following: 'Judgments in cases in which classified information has been applied shall be published in the part of their operative part and the grounds shall be published only where they do not discuss classified information.'

Additional question: State of play – and content – of the legal reform to transpose the Directive against SLAPP cases.

Information on SLAPP cases is provided in paragraph 39: "Judicial cases (including SLAPPs - strategic claims against public participation) and convictions of journalists (including defamation cases) and measures taken to protect against manifestly unfounded and abusive claims"

Additional question: State of play of the legislative proposal for lower penalties for defamation submits to the National Assembly for adoption

By Decision No 347 of the Council of Ministers of 2 June 2025, a bill amending and supplementing the Criminal Code was submitted to the National Assembly, proposing, in Article 147(1) of the Criminal Code, that the amount of the lower penalty threshold for defamation be reduced from 'three thousand' to 'one thousand' levs. On 18 July 2025, the National Assembly adopted, in a second vote, the Law amending and supplementing the Criminal Code, which also includes the proposal to reduce the penalty for defamation. The Act was promulgated in State Gazette No 61 of 2025. The Act is publicly available at the following address: <https://www.parliament.bg/bg/desision/ID/166498>

IV. Other institutional issues related to checks and balances

Please provide information, in order to follow up on the recommendations received in the 2025 Report, on the measures taken related to the control and balance system (if applicable).

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

A. Process of preparation and adoption of laws

☐ No development

☐ In case there are developments related to the process of preparation and adoption of laws, please indicate which ones, in particular with regard to the points listed below: ...

The relevant points that your contribution should cover are:

40 . 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).

By Decision No 175 of the Council of Ministers of 21 March 2025, the Concept for the Development of the Regulatory Policy of the Republic of Bulgaria 2025-2027 was adopted. The Concept presents the vision for the development of the regulatory policy of Bulgaria and is aimed at all stakeholders – the executive authorities and other state bodies entrusted with direct regulatory functions; local self-government bodies; persons performing public functions and organisations providing public services.

The concept further develops the established cooperation between the administration and the stakeholders, including by expanding the opportunities for civic participation in the legislative process and strengthening the interaction between the institutions of the executive power.

The main objectives of the concept are: Improving the regulatory process; Reducing the administrative burden and improving the administrative service; Promote the use of flexible and alternative regulatory approaches; Improving enforcement and administrative control; Increased administrative capacity.

Additional question: 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)

Additional question: Safeguards to ensure legal certainty, the stability of the legal framework and non-discrimination.

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

Information from the AMC Legal Directorate:

For 2025 to date, a total of 1657 acts have been adopted, of which: Decrees – 335 (of which 3 classified annexes with markings); Decisions – 911 (of which 14 marked); Orders – 5 and Protocol Decisions – 365 (of which 1 classified). 41 of these acts were adopted in absentia under Article 7(3) of the Rules of Procedure of the Council of Ministers and its Administration, according to which, exceptionally and on a proposal from the Prime Minister, the Council of Ministers may also adopt an act in absentia, i.e. those adopted under this procedure account for about 3 per cent of all adopted acts.

Information from AMS-Coordination and modernization of the administration:

With regard to public consultation procedures: The Law on Normative Acts regulates the procedure for conducting public consultations with citizens and legal entities. According to the provisions of Article 26, the consultation period is 30 days. The legislator has provided for the possibility of shortening this period to no less than 14 days. Until the preparation of this reply on 18 December, 118 shortened procedures for public consultation of draft legislative acts were carried out on the Public Consultation Portal with a central executive body as compiler. This represents around 10% of all consultations conducted so far in 2025.

- **44. Regime for constitutional review of laws**

Information from the Constitutional Court:

By Decision No 9 of 24 July 2025 in Case No 38/2024, the Constitutional Court rejected the requests of 55 Members of the 51st National Assembly, 53 Members of the 51st National Assembly and the President of the Republic of Bulgaria to establish the unconstitutionality of the amendments to Article 64(2), (3) and (4) due to the failure to achieve the majority of votes required under Article 151(1) of the Constitution; Article 65(1), second sentence; Article 99(5) and Article 102(3)(3), as inserted by §2, 3, 7, 1 and §8 of the Act amending and supplementing the Constitution of the Republic of Bulgaria (published in SG No 106 of 2023).

B. Independent bodies

- ☐ No development as regards independent bodies
- ☐ In case there are developments related to the independent bodies, please indicate which ones, in particular with regard to the points listed below:

The relevant points that your contribution should cover are:

- ***45. Independence, resources, capacity and powers of national human rights institutions ('NHRIs'), ombudsman institutions, if other than NHRIs, equality bodies, if other than NHRIs, and supreme audit institutions***²⁶

Information from the Ombudsman:

On 18 July 2025, the National Assembly elected Velislava Delcheva as Ombudsman of the Republic of Bulgaria. On 10 September 2025, the National Assembly elected Maria Filipova as Deputy Ombudsman. At the October 2025 session, the UN Sub-Committee on Accreditation re-accredited the institution of the Ombudsman of the Republic of Bulgaria with the highest status 'A' under the UN Paris Principles for a term of 5 years.

46. 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

Information from the Ombudsman:

In 2025, the Ombudsman made 967 recommendations on violations of citizens' rights, of which 93% were fully or partially implemented. Four changes in the legal framework were initiated and advice was given in relation to the rights and freedoms of citizens on 594 complaints.

47. 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,

Please see description of the amendments to the Law on Protection of Competition:
<https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=238447>

C. Accessibility and judicial review of administrative decisions

- ☐ No development
- ☐ In case there are developments related to the accessibility and judicial review of judicial decisions, please indicate which ones, in particular with regard to the points listed below:

The relevant points that your contribution should cover are:

²⁶ See the website of the European Court of Auditors:
<https://www.eca.europa.eu/en/Pages/SupremeAuditInstitutions.aspx#>

48. 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)

The new Public Consultation Portal was launched in November 2025. Part of it is a section entitled ‘Acts of the Council of Ministers’. The section publishes information about the legislative and operational programs of the Council of Ministers, as well as the acts adopted by it in the period after 1990.

49. 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).

50. Safeguards (other than judicial review) regarding decisions or inaction of administrative authorities, including remedies (e.g. administrative review)

51. Rules and practices related to the application by all courts, including constitutional jurisdictions, of the preliminary ruling procedure (Art. 267 TFEU)

52. 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

In order to address the systemic problem of non-implementation of judgments of the European Court of Human Rights (ECtHR) against Bulgaria, the Ministry of Justice developed in 2023-2024 a draft coordination mechanism to implement those judgments. The project is based on an in-depth analysis of the reasons for the ineffective implementation, carried out with the support of the Norwegian Financial Mechanism and in cooperation with the Council of Europe's Decisions Implementation Unit.

The analysis identifies two main problems: lack of a regulatory framework for the implementation of ECtHR judgments and serious shortcomings in coordination between executive authorities, including limited knowledge of human rights among civil servants. On the basis of these conclusions, a draft legislative act was prepared to establish a coordination mechanism within the executive power, with an envisaged advisory role for representatives of the judiciary, the Ombudsman, the Commission for Protection against Discrimination, the non-governmental sector and other stakeholders.

The proposed mechanism includes a clearly defined procedure for the implementation of ECtHR judgments, identifies the responsible bodies and provides for the functioning at political and expert level, assisted by a secretariat. It also regulates the process of identifying, assigning and implementing general measures necessary for the full implementation of court decisions.

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

D. An enabling framework for civil society

☐ No development

☐ In case there are developments related to the enabling framework for civil society, please indicate which ones, in particular with regard to the points listed below:

The appropriate points for your contribution to cover are:

54. 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)

Decision No 489 of the Council of Ministers of 23 July 2025 appointed the members of the Council for the Development of Civil Society. Under the mandate of the new configuration, three Council meetings were held in 2025 to address issues related to civil society development, normative initiatives and strategy papers.

The focus of the Council for the Development of Civil Society, with the assistance of the administration of the Council of Ministers, is aimed at participating in the elaboration of two key strategic documents envisaged at legislative level: Strategy to support the development of civil society organizations in the Republic of Bulgaria and Action Plan for its implementation.

By Order No P-187 of 22 October 2025 of the President of the Council for the Development of Civil Society, a Working Group was set up to prepare a draft Strategy for Supporting the Development of Civil Society Organisations in the Republic of Bulgaria. The document should include:

- analysis of the state of the civil sector;
- problems and evaluation of the results of the policies implemented, including threats to the exercise of civil rights, partnership and dialogue with institutions, financing mechanism;
- a vision for the development of the sector;
- strategic objectives to support the development of civil society;
- regional dimensions to support civil society;
- a general description of the content of activities and/or reforms to achieve the strategic objectives;
- expected results of activities and/or reforms expressed through indicators, including indicators to monitor the achievement of strategic objectives with current targets;
- an indicative amount of financial resources needed to achieve the strategic objectives for the entire implementation period;
- responsible institutions for the implementation, monitoring and control of the strategy;
- monitoring, reporting and evaluation mechanism.

A Roadmap for developing the Strategy was adopted in 2025.

A round table on the topic of volunteering was held, organized with the participation of members of the the Council for the Development of Civil Society and with the support of the administration of the Council of Ministers. The discussion was attended by MPs, representatives of civil society organizations working in the field of volunteering, youth policies, social services and philanthropy, as well as representatives of competent state institutions. The draft Law on Volunteering and the draft Law on Promotion of Volunteering were discussed, on which the Council for the Development of Civil Society adopted and sent opinions.

- ***55. 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.***

Pursuant to Article 4(1) of the Non-Profit Legal Entities Act, the Council for Civil Society Development exercises its powers to participate in the process of policy formulation and implementation by expressing opinions on draft normative acts and decisions.

In 2025, the following opinions and positions adopted by the Council or its members were sent by the Council for the Development of Civil Society Chair:

Opinion on the Draft Law amending the Criminal Code, submitted to the National Assembly on 07.10.2025 (signature 51-554-01-178); Opinion on a Bill amending the Consumer Protection Act, adopted by Decision No 550/2025 of the Council of Ministers and submitted to the National Assembly (signature 51-502-01-42); Opinion on the Draft Decision setting up a Temporary Committee to establish facts and circumstances concerning the activities of George Soros and Alexander Soros and their foundations (signature 51-554-02-279, submitted on 4 November 2025 and adopted

on 5 November 2025); Opinion on the Draft decision on early termination of the existence of the same temporary committee (signature 51-554-02-285); Opinion on the Proposal for amendment and supplement to the Bill on amendment and supplement to the Pre-school and School Education Act (signature 51-502-01-37, adopted at first vote on 08.10.2025); Opinion on a Bill / Draft Law on the Promotion of Volunteering.

A public event on volunteering was also held in 2025 as part of efforts to promote civic participation.

In order to promote standards and improve practices in the protection of human rights, the Ministry of the Interior operates a permanent working group on human rights, and regional working groups have been established. The Permanent Group participates in the development of policies to respect the rights and fundamental freedoms of citizens, analyses reports of monitoring bodies and proposes measures to address identified weaknesses, as well as coordinates opinions and answers on human rights issues.

Permanent and regional groups organize and coordinate activities such as forums, seminars and trainings, often in partnership with other state institutions, civil society organizations and international structures. The topic of human rights protection has been integrated from the initial stage of training of employees of the Ministry of the Interior and is present at all stages of their professional training, from initial training to training courses for upskilling and occupying managerial positions. The training documentation focuses on the lawful exercise of police powers, European legislation and the case law of the European Court of Human Rights, especially in cases related to unlawful actions of police officers.

Refresher trainings on the topic are held annually and locally. In addition, the discipline 'Countering Conventional Crime' addresses issues related to the protection of individuals – including civil society representatives, human rights defenders and journalists – from attacks, intimidation, legal threats and other crimes provided for in the Criminal Code.

The PPO referred to the information in point 37 is relevant. *"Capacity of law enforcement authorities, including during protests and demonstrations, to ensure the safety of journalists and to investigate attacks against journalists"*

56. 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)

In the framework of the Council for Civil Society Development, work continued on the development of a Financial Mechanism to support socially significant projects of civil society organizations. By an order issued at the end of 2025, a working group was established, the purpose of which is to prepare a legal framework for the spending of financial resources amounting to BGN 1 000 000 per year, provided for in the state budget to support public initiatives of non-profit legal entities.

On the basis of the decision of the Council for the Development of Civil Society under point 1 of the agenda of the meeting held on 20 November 2025, and in conjunction with Article 22 of the Rules on the organisation and operation of the Council for the Development of Civil Society (Decree of Council Of Ministers No 214/2019), the working group should prepare draft Rules on financial support to regulate eligible activities, selection procedures, accountability and control over the implementation of projects. The deadline for submitting the draft Rules is 1 October 2026. The work of the working group is supported organisationally and technically by the the Council for the Development of Civil Society Secretariat in the administration of the Council of Ministers.

E. Initiatives to promote a rule of law culture

☐ No development

☐ In case there are developments related to initiatives promoting a rule of law culture, please indicate which ones (e.g. debates in national parliaments on the rule of law, public information campaigns on rule of law issues, input from civil society, educational initiatives, etc.)

Information under heading E 'Initiatives to promote a culture of the rule of law'

Additional questions: State of play of the renewal of the mandates of independent and regulatory bodies.

Current state of play of the renewal of the mandates of the independent and regulatory authorities' of the additional questions, from 11.11.2024 to the present (during the mandate of the 51st National Assembly), the following bodies have been elected:

- Chairman and two members of the Energy and Water Regulatory Commission;
- Manager of the National Health Insurance Fund;
- Deputy Governor – Head of the Banking Supervision Department of the Bulgarian National Bank;
- Chairman of the Financial Supervision Commission and two Vice-Chairmen;
- Chairperson and members of the Fiscal Council;
- Judge at the Constitutional Court of the Republic of Bulgaria;
- Chairperson, Vice-Chairperson and members of the Commission for Protection of Competition;
- Chairperson, Vice-Chairperson and members of the Commission for Protection against Discrimination;
- Chairman of the Commission for Public Oversight of Statutory Auditors;
- President, Vice-Presidents and Members of the Court of Auditors;
- Chairperson and members of the Commission for Personal Data Protection;
- President, Vice-President and members of the National Bureau for the Control of Special Intelligence Means;
- Vice-President and members of the Communications Regulation Commission;
- Chairman, Deputy Chairman, Secretary and members of the Commission for Disclosure of Documents and Announcing Affiliation of Bulgarian Citizens to the State Security and the Intelligence Services of the Bulgarian People's Army;
- Manager and Deputy Governor of the National Social Security Institute;
- ombudsman and deputy ombudsman;
- Director General of the Bulgarian News Agency.

Other – please specify

Inter-pillar elements: cross-border rule of law issues in the Single Market

If you are aware of any significant Single Market challenges faced by your Member State's businesses or citizens in a cross-border context related to any of the four pillars of the report, including, for example, problems with market access and conditions for economic activities, please note them in your opinion.

Annex 1_SCC – corruption cases – 2025;

Annex 2_Information within the remit of the Supreme Judicial Council in relation to the preparation of the chapter on the Republic of Bulgaria of the seventh Rule of Law Report 2026;

Annex 3_PPO data on cases opened for corruption offences;

Annex 4_data from the PPO on cases opened for corruption offences, from which are derived data on cases opened for corruption offences with alleged perpetrator high-ranking officials;

Annex 5_Data from the PPO on crimes related to EU funds;

Annex 6_Information from the ISJC on the second recommendation of the report;

Annex 7_Information from the NIJ on training of magistrates;

Annex 8_ACC information on verified declarations of public figures;

Annex 9_Administrative burden reduction plan;

Annex 10_Information from the SCC on public attacks.