

LIBERTIES

RULE OF LAW

REPORT

2026



#roi-report2026

BULGARIA



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FOREWORD

The Liberties Rule of Law Report 2026 is the seventh annual report on the state of rule of law in the European Union (EU) published by the Civil Liberties Union for Europe (Liberties). Liberties is a non-governmental civil society organisation promoting the civil liberties of everyone in the EU, and it is built on a network of national civil liberties groups from across the EU. Currently, we have member organisations in Belgium, Bulgaria, the Czech Republic, Croatia, Denmark, Estonia, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, the Netherlands, Poland, Romania, Slovakia, Slovenia, Spain and Sweden, as well as a contributing partner organisation in Greece.

Liberties, together with its members and partner organisations, carries out advocacy, campaigning and public education activities to explain what the rule of law is, what the EU and national governments are doing to protect or harm it, and gathers public support to press leaders at EU and national level to fully respect, promote and protect our basic rights and values.

Drafted by Liberties and its member and partner organisations, the 2026 report covers the situation during 2025 with the purpose of providing the European Commission with reliable information and analysis from the ground to feed its own rule of law reports, and to provide an independent analysis of the state of the rule of law in the EU in its own right. Liberties' report represents the most in-depth reporting exercise carried out to date by a civil society network to map developments in a wide range of areas connected to the rule of law in the EU.

The 2026 report includes EU-wide trend analysis in the justice system, anti-corruption framework, media freedom, checks and balances, based on 22 country reports that follow a common structure, mirroring and expanding on the priority areas and indicators identified by the European Commission for its annual rule of law monitoring cycle. Nearly 40 organisations contributed to the compilation of these country reports. The 2026 report places particular emphasis on the recommendations made by the European Commission and how, in the assessment of Liberties' members, they have been implemented. Specific gaps were identified alongside new issues that arose in 2025.

[Download the full Liberties Rule of Law Report 2026 here.](#)

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BULGARIA

ABOUT THE CONTRIBUTING ORGANISATIONS

Bulgarian Helsinki Committee



The Bulgarian Helsinki Committee (BHC) is an independent, non-governmental, not-for-profit civil society organisation for defending fundamental human rights in Bulgaria: political, civil, cultural, and social. It was established in 1992. Among other things, the organisation works in the field of rule of law and independence of the judiciary.

Anti-Corruption Fund



The Anti-Corruption Fund is an independent, expert-led non-governmental organisation that investigates cases of alleged corruption, misuse of public funds, and conflicts of interest among public officials in Bulgaria. The organisation aims to assist public authorities and journalists in investigating and prosecuting corruption-related violations. Its goal is to help address systemic factors leading to high corruption levels and to raise public awareness about existing mechanisms to counteract corruption.

Association of European Journalists – Bulgaria



Association of European Journalists – Bulgaria (AEJ-Bulgaria) is a non-profit association and professional community of journalists whose goal is to improve the media environment and the quality of journalism in Bulgaria, as well as to support journalists who are prevented from freely performing their work. BHC is also a member of AEJ-International and the European Federation of Journalists.

OVERALL ASSESSMENT: DISMANTLER

In January 2025, the Citizens for European Development of Bulgaria (GERB), the political party that had held the parliamentary majority since 2009 and took part in all but two of the seven regular governments in that period, managed to form a new regular government. Officially, the government was formed in coalition with the Bulgarian Socialist Party and the right-wing populist There Is Such a People (ITN). Informally, the government was supported in the parliament also by the Movement for Rights and Freedoms (DPS), which was recently headed by Delyan Peevski, an oligarch and media mogul sanctioned for ‘serious corruption’ by the United States in 2021 under the Global Magnitsky Act and by the United Kingdom in 2023 under the Global Anti-Corruption Regime. Together with Boyko Borisov, GERB’s leader, for a couple of decades, Peevski has been accused of being a major figure behind the captured state, high-level corruption, and influence peddling in the judiciary.

On 5 February 2025, speaking to reporters in the corridors of the National Assembly, Borisov declared that no further legislative or constitutional steps regarding the judiciary would be initiated by his party. His comments were seen as a sharp pivot away from the reformist agenda that had characterised the previous two years.¹

In July 2025, Varna Mayor Blagomir Kotsev (from the opposition coalition PP-DB) was arrested in a high-profile operation by the Anti-Corruption Commission. He was charged with bribery and leading an organized criminal group, specifically involving an alleged 15% kickback request on a 1.5 million BGN contract for social services. Kotsev remained in custody for nearly five months before being released on 200,000 BGN (more than EUR 102,000) bail in late November 2025. The case was widely branded as political repression due to the arrest occurring just hours before a crucial municipal budget vote; the tip-off coming from a businesswoman with documented links to the rival GERB

¹ *Lachezar Lisitsov: Borisov Declared the Judicial Reform Complete, the Truth About the “Eight Dwarfs” Will Not Be Revealed* (Лъчезар Лисицов: Борисов обяви съдебната реформа за приключила, няма да се разкрива истината за „Осемте джуджета“), Club Z, 05 February 2025, <https://clubz.bg/158403>

party; the case being moved to Sofia under the pretext of an “unidentified MP” being involved;² as well, Kotsev himself claiming he was pressured to join Delyan Peevski’s MRF party.³

Following massive national protests, the government resigned on 11 December 2025.⁴

Throughout the year, the situation with freedom of media (especially in relation to the public television and SLAPPs), electing credible members of various public bodies with expired terms of office, as well as with the quality of legislative process did not improve.

Pressure over political opposition, issues with investigating high-profile corruption scandals, and issues in the judiciary portray Bulgaria as increasingly descending into a captured state, with key institutions incapable of producing independent investigations or prosecutions of serious corruption or human rights violations.

Assessment of the trajectory

Unlike the Hungarian and the former Polish government, the parties that were constantly involved directly or indirectly in the government of Bulgaria or holding parliamentary majority since mid 2009 – GERB and DPS (Movement for Rights and Freedoms; now split into two parties) – are not known for loudly attacking or defying EU institutions but rather for declarations of good partnership with them and for claims to working stringently to adhere to European standards. However, careful examination of actions and positions expressed by their decisive actors – MPs and ministers, as well as appointments in various institutions like the Constitutional Court – reveals quite a different picture. All key stakeholders related to those parties, as well as to various parties of systemic opposition and

2 *Mila Edreva and Metodi Yordanov: Varna Mayor Blagomir Kotsev Released from Custody, Bulgarian News Agency (BTA), 28 November 2025, <https://www.bta.bg/en/news/bulgaria/1017636-varna-mayor-blagomir-kotsev-released-from-custody>; Elitsa Simeonova: Who is Plamenka Dimitrova, Who Turned Out to Be a Witness against the Mayor of Varna, Radio Free Europe/Radio Liberty – Bulgarian Service (‘Елица Симеонова: Коя е Пламенка Димитрова, която се оказва свидетел срещу кмета на Варна, Свободна Европа’), 03 November 2025, <https://www.svobodnaeuropa.bg/a/33469369.html>*

3 *Blagomir Kotsev Hinted at Pressure from Peevski in a Letter sent from the Investigation Detention Facility (‘Благомир Коцев намекна за натиск от Пеевски с писмо от ареста’), Actualno.com, 15 November 2025, https://www.actualno.com/politics/blagomir-kocev-namekna-za-natisk-ot-peeovski-s-pismo-ot-aresta-news_2499355.html*

4 *Vera Alexandrova: Rosen Zhelyazkov: The Bulgarian Government Resigns, Bulgarian National Television (BNT) (‘Вера Александрова: Росен Желязков: Правителството подава оставка, Българска национална телевизия (БНТ)’), 11 December 2025, <https://bntnews.bg/news/rosen-zhelyazkov-pravitelstvoto-podava-ostavka-1369207news.html>*

satellite parties, demonstrate systematic opposition to any attempts of meaningful judicial reform, especially against securing a majority of judges electing peers in the Supreme Judicial Council, against introducing a truly independent institution for investigating the Prosecutor General and their deputies, and against appointments of magistrates critical towards the way judicial system functions. Furthermore, smear campaigns against critical voices – judges and civil society organisations – are a regular thing in media outlets associated with and amplifying the narratives of those political parties. The usual strategy for sabotaging reforms includes stalling substantial changes or saturating public debates with loud voices in support of alternative reforms that do not bring any change or give any chance of independent voices.

These strategies led to a serious level of captured institutions following 2020 – entirety of the Supreme Judicial Council except two members,⁵ the entirety of the Prosecutor’s Office, the National Investigation Service, the national anticorruption body (now split into two institutions), many judges (especially from the now closed Specialised Criminal Court and Specialised Appellate Criminal Court), the National Agency for State Security, the National Bureau for Control of Special Means of Surveillance, serious number of judges in the Constitutional Court, various independent agencies. Many cases of investigations of high-profile corruption and other crimes have either failed completely or failed in establishing the heads of operations behind them (stark examples among many others being the case of the Corporate Commercial Bank’s collapse,⁶ the Trakia motorway case,⁷ the Euro

5 Doroteya Dachkova: This Supreme Judicial Council Has Become a Council for Life (‘Доротея Дачкова: Този Висш съдебен съвет стана доживотен’), Segabg.com, 4 May 2025, <https://www.segabg.com/category-observer/tozi-vissh-sudeben-suvet-stana-dozhivoten>.

6 Parliamentary committee: *Corporate Commercial Bank was a financial pyramid from the outset*, Bulgarian National Television, 8 July 2015, <https://bnt.bg/news/parliamentary-committee-corporate-commercial-bank-was-a-financial-pyramid-from-the-outset-update-128039news.html>; *Parliamentary Hearing: Tsvetan Vasilev Reveals CCB’s Massive Financing of Peevski’s Media Empire*, Novinite.com, 15 August 2024, <https://www.novinite.com/articles/227774/Parliamentary+Hearing%3A+Tsvetan+Vasilev+Reveals+CCB%27s+Massive+Financing+of+Peevski%27s+Media+Empire>

7 *The Anti-Corruption Fund: The Hemusgate Case, Part 1: Hemusgate’s Monitoring Prosecutor Claims the Investigation Was Thwarted. No One in the Supreme Court of Cassation or the Prosecutor’s Office Wants to Verify His Claims* (‘Казусът „Хемусгейт“, част 1: Наблюдаващ прокурор на „Хемусгейт“ твърди, че разследването е било осуетено. Никой във ВКС и прокуратурата не иска да провери твърденията му’), 30 September 2025, <https://acf.bg/bg/kazusat-hemusgeyt-chast-1-nablyudava/>; *The Hemusgate Case, Part 2: How 54 Million Leva in Cash for Hemus Ended up in a Warehouse in Blagoevgrad and Why the Prosecutor’s Office Didn’t Indict the People Behind the Scheme* (‘Казусът „Хемусгейт“, Част 2: Как 54 млн. лева в брой за „Хемус“ се озовават в склад в Благоевградско и защо прокуратурата не обвини ръководителите на схемата’), 2 October 2025, <https://acf.bg/bg/kazusat-hemusgeyt-chast-2-kak-54-mln-le/>

Lab testing laboratory at Kapitan Andreevo border crossing,⁸ the Ruja Ignatova OneCoin case,⁹ two organised crimes groups for influence peddling in the judiciary where magistrates were complicit and still in office to date, three cases of high-profile assassinations of people from the Bulgarian underworld – Krasimir Kamenov “Karo”¹⁰, Alexey Petrov¹¹, and Martin Bozhanov “The Notary”,¹² and the bomb attack against the former Prosecutor General Ivan Geshev in 2023¹³).

All these portray Bulgarian institutions as incapable of producing meaningful reform from within, incapable of investigating people from the ruling status quo, and operating in a general situation of impunity and in private interests.

ACTIVATING OTHER PARTS OF THE EU RULE OF LAW TOOLBOX

The European Commission should maintain and expand the suspension of payments under the Recovery and Resilience Facility (RRF). Tranches related to the anticorruption framework must remain frozen until the Anti-Corruption Commission and the Commission for Forfeiture of Illegal Assets

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- 8 Marin Nikolov: *Private Business at the Border: Why the State Pays 10 Million Leva to the Company with the Laboratory* (‘Марин Николов: Частният бизнес на границата: Защо държавата плаща 10 млн. лв. на фирмата с лабораторията?’), bTV Media Group, 14 April 2024, <https://btvnovinite.bg/predavania/120-minuti/chastni-jat-biznes-na-granicata-zashto-darzhavata-plashta-10-mln-lv-na-firmata-s-laboratorijata.html>
- 9 *The Missing Cryptoqueen: Dead or Alive?* – BBC World Service Documentaries, BBC, 3 June 2024, <https://www.youtube.com/watch?v=FTnTTtoWEHvI>
- 10 *Photos and Documents: Taki, Karo, Ami... the Brother of the Head of the Parliament: A Freeze-Frame of the Captured State* (‘Снимки и документи: Таки, Къро, Ами... братът на шефа на Парламента: Стоп-кадър на превзетата държава’), Bird.bg, 5 June 2024, <https://bird.bg/taki-karo-ami/>; Daniel Dumev: *The Murder of Karo Becomes a Cold Case* (‘Даниел Думев: Убийството на Къро става студено досие’), BGDnes.bg, 31 May 2025, <https://www.bgdnes.bg/krimi/article/20612340>
- 11 *FBI Asks Apple to Unlock Alexey Petrov’s Phone* (‘ФБР поиска от Apple да отключи телефона на Алексей Петров’), Eurocom.bg, 8 September 2025, <https://eurocom.bg/2025/09/08/fbr-poiska-ot-apple-da-otklyuchi-telefona-na-aleksey-petrov/>
- 12 *New Revelations: What Did the Notary’s Killer Do After the Shooting?* (‘Нови разкрития: Какво прави убиеца на Нотариуса след разстрела’), Eurocom.bg, 29 April 2025, <https://eurocom.bg/2025/04/29/novi-razkritiya-kakvo-pravi-ubietsa-na-notarius-a-sled-razstre-la/>
- 13 *An Explosion Occurred next to Ivan Geshev’s Car near Samokov. The Prosecutor’s Office Is Investigating a Terrorist Act.* (‘Взрив е избухнал до колата на Иван Гешев край Самоков. Прокуратурата разследва терористичен акт’), Svobodnaevropa.bg, 1 May 2023, <https://www.svobodnaevropa.bg/a/32386988.html>

are managed by leadership appointed through a transparent, merit-based, and politically neutral process. The Commission needs to give a public and very clear (direct) signal against the ‘weaponization’ of regulatory bodies against independent officials. The recent decision by the Anti-Corruption Commission on the incompatibility of the deputy-governor of the Bulgarian National Bank Andrey Gyurov and his subsequent removal from office—despite the European Central Bank’s emphasis on central bank independence¹⁴—highlights a systemic failure to protect institutional integrity from political motives.

The Commission should consider whether the European Prosecutor’s Office security breach amounts to breach of the principle of sincere cooperation between the Member State and the EU (see section Anti-Corruption Framework below, subsection Gaps in the Commission’s Report).

State of play (versus 2025)

- 📉 Justice system
- 📉 Anti-corruption framework
- 📉 Media Environment and Media Freedom
- 📉 Checks and balances

Legend

- | Regression | No progress | Progress |
|------------|-------------|----------|
| 📉 | — | 📈 |

14 See European Central Bank’s statement during the hearing in Case C-611/24 before ECJ on 18 November 2025.

JUSTICE SYSTEM

General assessment

The prolonged instability of the Bulgarian judiciary, with key institutions turned into ‘forever rulers’ despite long-expired mandates, is gradually consolidating power over this branch of government. By stalling essential reforms recommended in the Commission’s 2025 report, the authorities have eroded the accountability of institutions such as the Prosecutor’s Office. The lack of progress on last year’s recommendations is exacerbated by inter-institutional attacks from the Prosecutor’s Office directed at the Supreme Court of Cassation and its President and amounts to de facto regression. While overt repression, smear campaigns, or arbitrary removal of judges remain either rare or completely absent, the prevailing atmosphere exerts a chilling effect and encourages self-censorship and compliance among magistrates. Dissenting voices, such as the Union of Judges in Bulgaria, suffer from limited media visibility and declining active membership.

Implementation of 2025 Commission recommendations

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 (first made in 2022)

In the entire 2025 neither the government nor the parliament introduced and advanced new draft Judicial System Act or amendments in the current one relevant to the recommendation.

Commission’s 2025 assessment: No progress

BHC’s current assessment: No progress

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 (first made in 2022)

The new draft JSA mentioned in Commission’s 2024 report was never advanced and tabled beyond publication on the web portal for public consultations.¹⁵ This might be due to the fall of the 102nd Bulgarian government on 9 April 2024 that was followed by two interim governments until 16 January 2025. The next regular government in power since then did not advance with the issue.

Commission’s 2025 assessment: No progress

BHC’s current assessment: No progress

¹⁵ See <https://strategy.bg/bg/public-consultations/8665>

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 (first made in 2022)

The newly elected government in power since January 2025 did not discuss or advance the matter of restructuring the SJC. The Commission should use the next report to demand the immediate and complete renewal of the Supreme Judicial Council (SJC) and its Inspectorate (ISJC). The continued operation of these bodies under expired mandates undermines the constitutional order and prevents effective judicial accountability.

Commission's 2025 assessment: No progress

BHC's current assessment: No progress

Gaps in the Commission's Report

Critical justice system institutions operate with expired terms of office

Terms of office of several critical institutions for the judicial system in Bulgaria have long expired – the Supreme Judicial Council (3 October 2022), the Inspectorate to the Supreme Judicial Council (March/April 2020), the Prosecutor General (held by an interim since 16 June 2023), and the President of the Supreme Administrative Court (22 November 2024). Following Boyko Borissov's statements of 5 February 2025 (see Overall Assessment above), the government took no measures in advancing any of the issues related to the judiciary or anticorruption framework in the entire 2025.

Interim heads of the Prosecutor's Office and the Supreme Court of Cassation are appointed by bodies with no power to make such appointments

Both the interim Prosecutor General – Borislav Sarafov, and the interim President of the Supreme Court of Cassation – Georgi Cholakov and later Marinka Cherneva, have been respectively appointed by the Prosecutorial and the Judicial chambers of the Supreme Judicial Council. Heads of the Prosecutor's Office and the two supreme courts, however, should be elected by the Plenary of the Supreme Judicial Council (Article 129 (2) of the constitution). Hence, the same body should be appointing the interims.

Futile mechanism for investigating the Prosecutor General

The mechanism for independent investigation of the Prosecutor General and their deputies – the central matter for execution of the European Court of Human Rights' judgment in the case *Kolevi v.*

*Bulgaria*¹⁶, remains futile and unfit for the purpose that it was created for, for it lacks de facto independence from the Prosecutor General and their deputies.¹⁷ Thus, since that judgment entered into force in 2010, 2026 will mark 16 years of failure of multiple governments and parliaments to introduce a robust legal framework allowing for independent investigation. This happens on the backdrop of serious corruption allegations against the interim Prosecutor General and his close family members – ex-wife and son – remaining not investigated.¹⁸

Failure to investigate two major influence peddling scandals in the judiciary

Bulgarian authorities continue to fail in investigating two major influence peddling scandals in the judiciary revolving around two criminal figures – Petyo Petrov a.k.a. the Euro, a former investigative magistrate and lawyer (currently a wanted person), and Martin Bozhanov a.k.a. the Notary (assassinated in January 2024).¹⁹

In April 2025, the Sofia City Prosecutor’s Office terminated the main pre-trial proceeding regarding the alleged extortion and bribery of magistrates by Petyo Petrov. The prosecution claimed a lack of evidence to prove the crimes, effectively “clearing” the high-level judicial figures involved.²⁰ In September 2025, the Sofia City Court acquitted Konstantin Sulev, the prosecutor who had originally tried to investigate Petyo Petrov and his links to the current acting Prosecutor General, Borislav Sarafov.²¹ In their 2025 report, the Investigative NGO Anti-Corruption Fund (ACF) highlights that Daniela Taleva (the special prosecutor for investigating the Prosecutor General) closed multiple investigations into Borislav Sarafov’s alleged links to the Eight Dwarfs network due to a lack of evidence.²²

16 *Application no. 1108/02, judgment of 5 November 2009.*

17 *See the chapter on Bulgaria in Liberties’ 2025 Rule of Law Report, pp. 146–148.*

18 *See the chapter on Bulgaria in Liberties’ 2025 Rule of Law Report, p. 143.*

19 *See the chapter on Bulgaria in Liberties’ 2025 Rule of Law Report, pp. 142–144.*

20 *Main Pre-Trial Proceedings in the “Eight Dwarfs” Case Have Been Terminated (‘Прекратиха основно досъдебно производство по казуса „Осемте джуджета“), News.bg, 24 April 2025, <https://news.bg/crime/prekratiba-osnovno-dosadebno-proizvodstvo-po-kazusa-osemte-dzhudzheta.html>*

21 *The court acquitted the prosecutor; SJC to decide on Sarafov’s nomination; Construction in Varna on hold, Capital Insights, 30 September 2025, <https://kinsights.capital.bg/4834857>*

22 *The Anti-Corruption Fund: Annual Monitoring Report: Anti-Corruption Institutions in 2024, Anti-Corruption Fund (ACF), June 2025, https://acf.bg/wp-content/uploads/2025/06/ACF_Report2025_EN_web.pdf*

The investigation into Bozhanov's murder remained at a standstill. Furthermore, no magistrates have been formally charged for their participation in his network.²³

New Issues that Emerged in 2025

A smear campaign against the President of the Supreme Court of Cassation is going unsanctioned or addressed by the authorities

Following several instances of courts challenging the legitimacy of the interim Prosecutor General, several smear campaigns against the President of the Supreme Court of Cassation, Galina Zaharova has been launched.

In August 2025, the Varna Appellate Court filed a case in the Constitutional Court requesting it to either declare Article 173 (15) of the Judicial System Act void as incompatible with the constitution or to give an interpretation of it in the light of the constitution.²⁴ The central matter of that provision and the case before the Constitutional Court is whether Borislav Sarafov could be regarded as a legitimate interim Prosecutor General following 21 July 2025. This is the date by which the newly adopted Article 173 (15) allows for the same person to hold the interim office.

While the case was pending in the Constitutional Court, on 2 October 2025, in two consecutive rulings²⁵, the Supreme Court of Cassation declared Borislav Sarafov an illegitimate interim Prosecutor General and refused to grant his requests for reopening two criminal cases where final judgments had already delivered. Next, the Prosecutor's Office published a statement on its website declaring the two rulings an "action dictated by the relentless attempts to destabilise the judiciary". In the statement, the

23 *Boris Mitov: A Year After the Murder. No Charges for the Notary's Group, not a Single Magistrate Has Been Indicted, Radio Free Europe/Radio Liberty – Bulgarian Service* ('Борис Митов: Година след убийството. Няма обвинени за групата на Нотариуса, нито един уличен магистрат, Свободна Европа'), 27 January 2025, <https://www.svobodnaevropa.bg/a/niama-obvineni-grupa-notariusa-nito-edin-ulichen-magistrat/33298142.html>

24 *The Constitutional Court Gave a Deadline to the Administrative Court - Varna to Clarify Its Request for the Legitimacy of Sarafov as Acting Chief Prosecutor* ('КС даде срок на АС – Варна да уточни искането си за легитимността на Сарафов като и.ф. гл. Прокурор'), *DeFakto.bg*, 8 January 2026, <https://defakto.bg/2026/01/08/ks-varna-za-utochniya-iskaneto-na-as-varna-za-legitimnostta-na-sarafov-kato-i-f-gl-prokuror/>

25 *Rulings nos. 2035 and 16950 of 2 October 2025 (Разпореждане № 2035 от 02.10.2025 г. по вх. № 16950 от 18.09.2025 г. и Разпореждане № 2036 от 02.10.2025 г. по вх. № 16595 от 15.09.2025 г. на ВКС). Retrieved from <https://www.vks.bg/pregled-akt.jsp?type=ot-spisak&id=0F77681CF21824A6C2258D17004701A3> and <https://www.vks.bg/pregled-akt.jsp?type=ot-spisak&id=196AD3E4E16A3CBCC2258D17004795F5>.*

Prosecutor's Office openly criticised "the leadership of the Supreme Court of Cassation" for remaining silent on unspecified attacks against judges.²⁶

Shortly after that, Angels on the Road, a civil society organisation of relatives of road accident victims, publicly called for Zaharova's resignation for allowing delayed justice in cases of road incidents and light sentencing. Their representative Nikolay Popov called the Supreme Court of Cassation "Politburo of the justice system".²⁷ He further challenged Zaharova in a Facebook post for undermining the interim Prosecutor General.²⁸ This was coupled with tabloid media publications also attacking the courts for questioning the legitimacy of Sarafov.²⁹

Again, in October Boyan Novansky, a member of the Supreme Judicial Council, raised concerns that the Russian anti-virus software of Kaspersky Labs is used by the Supreme Court of Cassation and said it is compromising national security. He further insinuated that the 2 October 2025 rulings of the court might have been stating that Borislav Sarafov is a legitimate interim Prosecutor General, but Russian hackers might have rewritten the contents of the rulings. Novansky defended replacing Kaspersky's product with Trellix – another software solution also criticised for its capabilities to share files with foreign governments or edit their contents without the knowledge of the user.³⁰

26 *Position statement of the Prosecutor's Office of the Republic of Bulgaria* ('Позиция на прокуратурата на Република България'), Prosecutor's Office of the Republic of Bulgaria, 3 October 2025, <https://prb.bg/bg/news/aktualno/75417-pozitsiya-na-prokuraturata-na-republika-balgariya>

27 *Siyana's Father Organises a Petition for the Resignation of Galina Zakharova from the Supreme Court of Cassation, Radio Free Europe/Radio Liberty – Bulgarian Service* ('Бащата на Сияна организира подписка за оставката на Галина Захарова от ВКС, Свободна Европа'), 21 November 2025, <https://www.svobodnaevropa.bg/a/bashta-siyana-podpiska-ostavka-galina-zaharova-vks/33598147.html>

28 *Siyana's Father Organises a Petition for the Resignation of Galina Zakharova from the Supreme Court of Cassation, Radio Free Europe/Radio Liberty – Bulgarian Service* ('Бащата на Сияна организира подписка за оставката на Галина Захарова от ВКС, Свободна Европа'), 21 November 2025, <https://www.svobodnaevropa.bg/a/bashta-siyana-podpiska-ostavka-galina-zaharova-vks/33598147.html>

29 *Victoria Georgieva: Judges Against Society – Another Episode, Trud Newspaper* ('Виктория Георгиева: Съдиите срещу обществото – епизод пореден, Труд'), 8 October 2025, <https://trud.bg/a/articles/съдиите-срещу-обществото%2%A0-епизод-пореден>

30 *They Unsuccessfully Tried to Implicate Galina Zakharova, Chairperson of the Supreme Judicial Council, in a Scandal Involving Russian Software Installed by the Supreme Judicial Council back in 2012.* ('Неуспешно опитаха да оплетат Галина Захарова, председател на ВКС, в скандал с руски софтуер, внедрен от ВСС още през 2012 година'), DeFakto.bg, 27 November 2025, <https://defakto.bg/2025/11/27/neuspeshno-opitaha-da-opletat-galina-zaharova-predsedatel-na-vks-v-skandal-s-ruski-softuer-vnedren-ot-vss-osthe-prez-2012-godina/>

None of those two instances of attacks against the court and of Zaharova were addressed by the Supreme Judicial Council or any other institution. In mid-December, ambassadors of Germany and France in Bulgaria met with Zaharova and publicly declared their support for the independence of judges in Bulgaria.³¹

Interim Prosecutor General asking a judge to recuse herself from a case against him for being a member of the Union of Judges in Bulgaria

In October 2025, acting Prosecutor General Borislav Sarafov requested the recusal of Judge Miroslava Todorova from a case regarding a refusal to investigate him. The case stems from a complaint by the NGO BOETS following an ad hoc prosecutor's decision not to launch proceedings based on the 'Euroleaks' files—alleged archives of Petyo Petrov (see *Gaps in the Commission's Report* above) purportedly proving Sarafov obstructed investigations. Sarafov cited three grounds for recusal:

1. Todorova belongs to the Union of Judges in Bulgaria, a professional NGO which called for his resignation after he exceeded the legal six-month limit for acting heads.
2. Alleged disciplinary files against Todorova were found in Petrov's archives.
3. The statute of limitations for appeal has expired.

This move is seen as part of a broader systemic failure to ensure independent oversight of the Prosecutor General. Critics, including legal experts from the Anti-Corruption Fund, argue the judiciary is failing to hold high-level figures accountable amidst these 'influence broker' scandals.³²

Implications and Recommendations for 2026

The gaps in the Commission's report, the continued inaction to address long-standing recommendations from past reports, and the new issues that emerged over 2025 necessitates further action. BHC would like to see the next report include the following recommendations.

31 *Stefan Milanov: Why Did the Ambassadors of Germany and France Have to Defend the Chairperson of the Supreme Court of Cassation? And from Whom? ('Стефан Миланов: Защо се наложи посланиците на Германия и Франция да бранят председателя на ВКС? И от кого')*, ClubZ.bg, 16 December 2025, <https://clubz.bg/169016>

32 *Borislav Sarafov Demands the Disqualification of Judge Miroslava Todorova from a Case Related to Refusal to Be Investigated ('Борислав Сарафов иска отвод на съдия Мирослава Тодорова от дело, свързано с отказ да бъде разследван')*, DeFakto.bg, 14 October 2025, <https://defakto.bg/2025/10/14/borislav-sarafov-iska-otvod-na-sadiya-miroslava-todorova-ot-delo-svarzano-s-otkaz-da-bade-razsledvan/>

Suggested recommendation: Demand the immediate and complete renewal of the Supreme Judicial Council (SJC) and its Inspectorate (ISJC). The continued operation of these bodies under expired mandates undermines the constitutional order and prevents effective judicial accountability.

Suggested recommendation: Reform the mechanism for investigating the Prosecutor General and ensure the selection of a new, permanent head through a procedure that excludes political ‘influence brokers’ and ensures genuine public transparency.

Suggested recommendation: Cease attempts to discredit the President of the Supreme Court of Cassation and highlight the need to re-initiate the reform of the Supreme Judicial Council—the national body responsible for safeguarding the independence of the judiciary.

Implementation of Judgments

While individual measures in the form of monetary compensations defined in ECtHR’s judgments are usually promptly executed, Bulgaria lags in executing prescribed general measures, especially in issues deemed ‘controversial’ like legalising same-sex families (*Koilova and Babulkova v. Bulgaria*, no. 40209/20), registration of NGOs of people with Macedonian ethnic identity (the *UMO Ilinden and Others* group of cases), registration of Christian Orthodox churches other than the Bulgarian Orthodox Church (*Bulgarian Orthodox Old Calendar Church and Others v. Bulgaria*, no. 56751/13), allowing prisoners to vote in general elections (*Kulinski and Sabev v. Bulgaria* group of cases), etc. While procedural laws provide for reopening court cases following ECtHR’s judgments, instances where legislative measures are needed, as well as some other situations where measures are generally left to the discretion of the legislative branch, executive branch or local authorities, remain unregulated. Bulgarian legislation lacks any provisions capable of forcing the executive or legislature to take specific measures for removing a violation embedded in legislation or administrative practices. The body vested with responsibilities to monitor and foster the execution of ECtHR’s judgments is the same department in the Ministry of Justice responsible for the representation of Bulgaria before the ECtHR.

ANTI-CORRUPTION FRAMEWORK

General assessment

Bulgaria's captured-state situation has transformed the anti-corruption framework from a mechanism for combating corruption into a tool used against political and business opponents of the de facto controllers of state institutions. There was a significant increase in such institutional attacks in 2024, a trend that deepened further in 2025. Anti-corruption bodies initiated arbitrary criminal proceedings against several political figures with the explicit intention of reshaping the political landscape through the use of criminal justice.

Implementation of 2025 Commission recommendations

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 (first made in 2022)

There has been no progress towards implementing this recommendation. The Commission's recommendations are mainly of technical nature and are made on the assumption that Bulgaria is a functioning democracy with some flaws that can be addressed through technical measures such as the introduction of new laws, amendments to existing laws, strengthening the capacity of current institutions, etc. The recommendation is not applicable to a country like Bulgaria, which has serious systemic problems with the rule of law in its very core. High-profile criminal investigations for alleged corruption are being used as smokescreen for politically motivated attacks. If there was a "robust track record of final judgments in high-level corruption cases", initiated by the captured anti-corruption institutions against the political and business opponents of their de facto owners, this would not mean an improvement in the rule of law, but a further decline. In its current state, if the Anti-Corruption Commission becomes more effective, this would mean even more arbitrary actions.

Given the state of Bulgaria's democracy, the Commission should revise their recommendations, pushing for:

- *a fundamental change through evolution of professional ethos and political culture in the very way public authority is exercised in Bulgaria*

- comprehensive reform of the criminal justice system regarding in particular: 1) the structure of the Supreme Judicial Council and enforced in practice better selection criteria for its members; 2) the Prosecutor's Office including its leadership, structure and forms of external control; 3) the rules of criminal procedure and substantive criminal law
- full audit of the Anti-corruption Commission, followed by large-scale reform including its leadership, powers and forms of external control

Commission's 2025 assessment: No progress**BHC's current assessment: No progress**

Gaps in the Commission's Report

Key judicial/anticorruption institutions are controlled by political figures

In 2025, Bulgarian judicial/anticorruption institutions continued operating in an environment of a “captured state”.³³ The most important judicial/anticorruption institutions (or at least key parts of them) are controlled behind the scenes by major political figures (who also hold significant economic power) and do not act in public, but in private interests. Failure to recognise and name this issue is failing to identify the shortcomings in achieving a functioning democracy in the country.

33 A. Yankulov, D. Peneva: *Anti-Corruption Institutions: A “New” Beginning* (p. 10), ACF, 2025: https://acf.bg/wp-content/uploads/2025/06/ACF_Report2025_EN_web.pdf; A. Yankulov, D. Peneva: *Anti-Corruption Institutions: A Freezing Point* (pp. 9-10), ACF, 2024: https://acf.bg/wp-content/uploads/2024/06/ACF_Report2024_EN_web.pdf; Antoaneta Roussi: *Mafia state pushes Bulgarian democracy to the brink*, Politico, 29 May 2024, <https://www.politico.eu/article/bulgaria-election-delyan-peeovski-boyko-borissov-state-capture-democracy-mafia/>; Philip Volkmann-Schluck: *“Offenbart das Versagen Europas“ – Wie ein Oligarch seine Macht im Euro-Beitrittsland ausbaut*, die Welt, 17 July 2025, <https://www.welt.de/politik/ausland/article256407088/bulgarien-offenbart-das-versagen-europas-wie-ein-oligarch-seine-macht-im-euro-beitrittsland-ausbaut.html>; *The Captured State: In Search of Anti-Corruption Results (Завладяната държава: в търсене на антикорупционни резултати.) Policy Brief No. 144*, Center for the Study of Democracy, 2024, https://csd.eu/fileadmin/user_upload/publications_library/BRIEF_CSD_144_BG_WEB.pdf.

For example, the Commission sees the clear evidence that there are virtually no positive results, i.e. final convictions, from the investigation and prosecution of high-level corruption³⁴ and recommends that Bulgaria ensure a solid track record of investigations, prosecutions and final judgments in high-level corruption cases. What the Commission fails to see are the real reasons behind this lack of results. To achieve final convictions has not been the aim of the anticorruption institutions up to now. High-profile criminal investigations for alleged corruption are being used as a smokescreen for politically motivated attacks. The criminal investigation itself and/or Information obtained during the investigation has been used selectively and temporarily for public shaming and political pressure towards the investigated individual and a chilling effect towards others. When these paralegal goals are reached, no one cares what happens to the criminal investigation itself.

If the high-profile criminal investigations for high-level corruption continue to be directed only against the political and business opponents of the de facto owners of the institutions, while at the same time they and their political and business partners enjoy virtually immunity from criminal prosecution, and these investigations begin to result in final convictions, then the technical criterion ‘final convictions’ will be met, but this will not mean that the rule of law has improved – on the contrary, quite the opposite.

In 2025 we witnessed a further deepened trend of arbitrary and politically motivated actions of the most important anticorruption institutions in Bulgaria – the Public Prosecutor’s Office and the Anti-Corruption Commission. As it was the case also in 2024, in 2025 all high-profile criminal investigations for corruption or related crimes were directed against political figures who happen to be political opponents or connected to political opponents of Delyan Peevski – political leader of

34 ACF has closely examined the development of these criminal proceedings in six consecutive annual monitoring reports. According to the organization’s methodology for identifying the most significant criminal cases of alleged corruption in Bulgaria out of 66 cases reviewed since 2014, of which 39 have been concluded, final convictions have been achieved in only 4. Of these, an actual prison sentence has been imposed in only 1 of the analysed cases - A. Yankulov, A. Slavov: *Anti-Corruption Institutions: Activity without Visible Results*, Anti-Corruption Fund, 2020, https://acf.bg/wp-content/uploads/2020/06/ACF_ENG_2020-1.pdf; A. Yankulov, N. Kiselova: *Anti-Corruption Institutions: Escalating Problems*, Anti-Corruption Fund, 2021, https://acf.bg/wp-content/uploads/2021/07/ACF_ENG_Online_Jul15-1.pdf; A. Yankulov, A. Kashumov, *Anti-Corruption Institutions: a Zero Year*, Anti-Corruption Fund, 2022, https://acf.bg/wp-content/uploads/2022/07/ACF_Report_ENG_2022_interactive2.pdf; A. Yankulov, D. Peneva: *Anti-Corruption Institutions: Eyes Wide-shut*, Anti-Corruption Fund, 2023, https://acf.bg/wp-content/uploads/2023/06/ACF_Report2023_EN_web.pdf; A. Yankulov, D. Peneva: *Anti-Corruption Institutions: A Freezing Point*, Anti-Corruption Fund, 2024, https://acf.bg/wp-content/uploads/2024/06/ACF_Report2024_EN_web.pdf; A. Yankulov, D. Peneva: *Anti-Corruption Institutions: A “New” Beginning*, Anti-Corruption Fund, 2025, https://acf.bg/wp-content/uploads/2025/06/ACF_Report2025_EN_web.pdf

the party DPS (Movement for Rights and Freedoms). Peevski was sanctioned for corruption by the United States in 2021 under the Global Magnitsky Act³⁵ and by the United Kingdom in 2023 under the Global Anti-Corruption Regime³⁶, but was never investigated for corruption by the Bulgarian authorities in an official criminal proceeding.

At the same time, no high-profile investigations for alleged corruption were initiated in 2025 against any political figures from the current ruling majority. Although Peevski's party is not an official partner in the formal 4-party coalition that forms the government, it supports the government in all major decisions.

In May 2025, Ivan Demerdziev,³⁷ former minister of interior in a caretaker government appointed by the president Rumen Radev (not a candidate from the ruling coalition parties), was charged for alleged mismanagement of public funds. In October he was indicted, but in December Sofia City Court referred the case back to Sofia City Prosecutor's Office due to procedural infringements.

In June 2025, Nikola Barbutov,³⁸ a deputy-mayor of Sofia from the party PPDB (Continue the Change/ Democratic Bulgaria coalition), was charged with alleged participation in an organised criminal group, a general abuse of office and bribery, and was detained (together with other public officials) during criminal proceedings initiated by the Anti-Corruption Commission under the supervision of Sofia City Prosecutor's Office. In November, an indictment was filed.

In July 2025, Blagomir Kotsev,³⁹ a mayor of the third largest city, Varna, from the coalition PPDB (Continue the Change/ Democratic Bulgaria), was charged with alleged participation in an organised criminal group and influence peddling and was detained (together with other public officials) during criminal proceedings initiated by the Anti-Corruption Commission under the supervision of Sofia City Prosecutor's Office. In November, an indictment was filed.

35 *Treasury Sanctions Influential Bulgarian Individuals and Their Expansive Networks for Engaging in Corruption*, US Department of the Treasury, 2 June 2021, <https://home.treasury.gov/news/press-releases/jy0208>

36 *UK sanctions high profile Bulgarian figures involved in corruption*, gov.uk, 10 February 2023, <https://www.gov.uk/government/news/uk-sanctions-high-profile-bulgarian-figures-involved-in-corruption>

37 *Ex-Caretaker Interior Minister Demerdzhiev Charged with Mismanagement*, BTA, 25 April 2025, <https://www.bta.bg/en/news/bulgaria/878816-ex-caretaker-interior-minister-demerdzhiev-charged-with-mismanagement>

38 *Newly Dismissed Sofia Deputy Mayor Barbutov Charged with Participating in Organized Crime Group and Bribery*, BTA, 25 June 2025, <https://www.bta.bg/en/news/bulgaria/918180-newly-dismissed-sofia-deputy-mayor-barbutov-charged-with-participating-in-organi>

39 *Bulgaria's arrest of liberal, pro-EU mayor sparks protests*, DW, 26 July 2025, <https://www.dw.com/en/bulgarias-arrest-of-liberal-pro-eu-mayor-sparks-protests/a-73425408>

Both remained in pre-trial custody for several months before being released near the end of the year.

The criminal proceedings against them match at least several indicators used by European Court of Human Rights case-law⁴⁰ to identify criminal proceedings used as a smokescreen for achieving paralegal goals (in countries like Russia, Turkey, Georgia, Azerbaijan).

These markers/indicators include:

- disproportionately long detention given the nature of the charges and the accused persons' profiles;
- selective evidence gathering – ignoring key witnesses, one-sided collection of evidence;
- use of media and institutional pressure, public statements of guilt;
- procedural anomalies – e.g. evidence of forum shopping; long periods of inactiveness of the investigation followed by short periods of rapid procedural action; leaks to certain media outlets of evidence obtained during the investigation;
- strong political context – the criminal proceedings can be directly linked to political events.

New Issues that Emerged in 2025

The EPPO scandal

Videos, allegedly taken with a hidden camera, were published in 2025 in the media suggesting that a Bulgarian European Prosecutor involved with an influence peddling criminal group was appointed in the European Public Prosecutor's Office (EPPO).

In February 2025, the weekly outlet Capital published an interview⁴¹ with the Bulgarian European Prosecutor Teodora Georgieva who is quoted as saying that she encountered institutional pushback on

40 For example: *Merabishvili v. Georgia*, ECHR, 2017; *Selabattin Demirtaş v. Turkey (No. 2)*, ECHR, 2018; *Kavala v. Türkiye*, ECHR, 2022; *Navalnyy v. Russia*, ECHR, 2018; *Ilgar Mammadov v. Azerbaijan*, ECHR, 2014; *Rasul Jafarov v. Azerbaijan*, ECHR, 2016

41 European Prosecutor Teodora Georgieva: Public Procurement Is a Well-Established Scheme to Drain Funds ('Европрокурорът Теодора Георгиева: Обществениите поръчки са отработена схема за източване на средства'), capital.bg, 28 February 2025, https://www.capital.bg/politika_i_ikonomika/pravo/2025/02/28/4748542_teodora_georgieva_obshtestvenite_poruchki_sa/.

cases involving influential individuals and the lack of willingness of the police to assist with investigations into suspected corruption, including the expansion of the Chiren natural gas storage facility⁴².

In March 2025, a letter and two videos were disseminated to the media from an anonymous account claiming to represent Petyo Petrov, known as ‘The Euro’, a former investigator featured in the ACF investigation *The Eight Dwarfs*—which exposed a criminal network for influencing the judiciary. The letter referred to a report allegedly sent by the person claiming to be Petrov to various public institutions. According to the letter, the report contained information concerning unlawful conduct, including corruption, by Bulgarian magistrates, among them Teodora Georgieva. The source of the leak asserted that the videos had been recorded using a hidden camera at *The Eight Dwarfs* restaurant. The footage shows Petrov and another individual, alleged to be Teodora Georgieva, discussing what appears to be Georgieva’s appointment to the European Public Prosecutor’s Office (EPPO) in 2020. In one of the recordings, Petrov is heard saying: “Anyway, we consider it an important position. We have decided. You take it and so be it.”⁴³

To date, Georgieva has not denied the allegations or contested the legitimacy of the recordings.

In March 2025, the EPPO issued an unprecedented announcement stating that the European Chief Prosecutor had informed the European Parliament, the Council of the European Union, and the European Commission of the initiation of an administrative inquiry into possible wrongdoing by the Bulgarian European Prosecutor, and had ordered the temporary suspension of Teodora Georgieva.⁴⁴ Georgieva did not issue a public statement. However, in interviews with several Bulgarian media outlets, she stated that she had withdrawn from the Chiren investigation because she felt threatened by Delyan Peevski. According to her, a subcontractor removed from the project had identified Peevski as the individual exerting pressure on them. Georgieva further claimed that she had received threats involving the release of compromising materials.

Despite the fact that their main goal is to undermine the credibility of the Bulgarian European Prosecutor, the leaked recordings – which the implicated person has so far not denied – show the ugly truth about high-level appointments, in the Bulgarian criminal justice system and beyond, which appear

42 *The issues surrounding this project have been described extensively in ACF’s investigation Chiren: Tenders with Convenient Incline, ACF, 26 November 2024, <https://acf.bg/en/razsledvane-na-akf-darzhavata-se-e-otka/>*

43 “*They have both the bread and the knife.*” *The Euro and the Notary are gone, but the scheme with kompromat materials is working* („Държат и хляба, и ножа“. Еврото и Нотариуса ги няма, но схемата с компромати работи), *svobodnaevropa.bg*, 21 March 2025, <https://www.svobodnaevropa.bg/a/33346346.html>

44 *European Prosecutor suspends its Bulgarian member, EURACTIV, 28 March 2025, <https://www.euractiv.com/news/epo-suspends-european-prosecutors-bulgarian-member/>*

to have been secured with the help of the criminal organisation of Petyo Petrov ‘The Euro’. The level of certainty regarding Petrov’s involvement is so high because the subjects of discussion in the leaked videos coincide with events that did occur – for example, the reshuffling in the list of the candidates for the position of Bulgarian European Prosecutor which took place after a decision by the Bulgarian government in 2020.

The case against Varna mayor Blagomir Kotsev

The mayor of the third-largest city in Bulgaria was arrested in a case revealing alarming ECtHR indicators for a sham process.

In 2025, pre-trial detention during corruption investigations involving high-level public officials continued to be used as a tool of pressure against political opponents. This practice was aimed at influencing political processes and reshaping the political landscape. During the year, this model was applied in new and more far-reaching ways.

The clearest example is the case against Varna mayor Blagomir Kotsev. He was deprived of his liberty for nearly five months during a pre-trial investigation with numerous procedural anomalies started by the Anti-Corruption Commission and supervised by Sofia City Prosecutor’s Office. In addition to the procedural anomalies, it should also be considered that Kotsev is a public figure, with no prior criminal record, a father of two young children, one of whom is a baby. He was not accused of committing violent crimes, but of corruption-related ones, which were essentially either some forms of preparatory criminal activity or unsuccessful attempts, i.e. without actual harm occurring for anyone or anyone’s enrichment. The almost five-month lengthy pre-trial detention in such a case was legally and practically incomprehensible.

Some examples of procedural anomalies: the criminal proceedings were initiated by the Anti-Corruption Commission on 19 November 2024 with the interrogation of a witness. After that, there was extremely low procedural activity – in January 2025 traffic data was requested (denied by the court), and in June 2025 the same witness was interrogated again. Nearly eight months after the start of the investigation and with almost no investigative actions taken, the so-called ‘realisation’ was carried out, during which Kotsev was detained on 8 July 2025. Another main witness, former deputy mayor, was questioned for the first time on the evening of 8 July 2025, after the arrest. Information that he had been given incriminating testimony against the mayor leaked earlier that day from the Anti-Corruption Commission to the media. On 16 July 2025, the witness made a public statement that the incriminating testimony was given under pressure from the Anti-Corruption Commission officers and submitted a written statement to this effect to Sofia City Prosecutor’s Office. He was questioned about these statements only on 2 October 2025.

After he was released from detention, Kotsev said in a TV interview that before his arrest he had received persistent messages to join the party of the “new sheriff in town” DPS (Movement for Rights and Freedoms) led by Delyan Peevski.⁴⁵ In 2025, many mayors and other local leaders from other parties and factions joined Peevski’s camp and took pictures with him in his office as a display of loyalty to him.⁴⁶ A Varna elected MP from GERB (Citizens for European Development of Bulgaria), the main party in the current ruling coalition, said in a radio interview that Kotsev did not listen to him to resign as mayor of Varna and this led to his arrest.⁴⁷

Implications and Recommendations for 2026

The gaps in the Commission’s report and new issues that have emerged require action by the Commission. The real picture of high-level corruption in Bulgaria remains obscured. The most high-profile criminal proceedings for alleged corruption are initiated by the Prosecutor’s Office and Anti-Corruption Commission in a selective and arbitrary manner and do not reflect the actual level of corrupt activity among high-ranking public officials⁴⁸. At the same time, substantial evidence of alleged corruption published by independent media and civil society organisations is completely ignored by the institutions if it concerns the political actors (or their political or business partners) who exercise the behind-the-scenes control over the independent on paper state anticorruption bodies.

By way of illustration, in 2025 the ACF published a comprehensive three-part investigation on one of the most closely guarded secrets of Bulgaria’s energy sector: the informal energy cartel dubbed “Orion”. This complex web of corporate entities comprised over 150 companies with ostensibly unrelated owners across multiple jurisdictions. The ACF’s findings revealed a range of serious malpractices, including illicit financial incentives for public officials, six-figure loans for politicians, multi-million-euro tax and social security fraud, carbon quota fraud, and leakage of sensitive information

45 *Blagomir Kotsev Received Persistent Messages to Join the “New Sheriff”* (‘Благомир Коцев получавал упорити послания да се присъедини към “новия шериф”’), *dnevnik.bg*, 7 December 2025, https://www.dnevnik.bg/bulgaria/2025/12/07/4861508_blagomir_kocev_poluchaval_uporiti_poslaniia_da_se/.

46 *They Changed Their Master: Delyan Peevski’s Mayors* (Те смениха господаря: кметовете на Делян Пеевски), *DW*, 1 May 2025, <https://www.dw.com/bg/te-smeniba-gospodara-kmetovete-na-delan-peevski/a-72404707>

47 *GERB MP: Blagomir Kotsev Did Not Listen to Me to Resign, That’s Why He Is in the Investigation Detention Facility* (Депутат от ГЕРБ: Благомир Коцев не ме послуша да подаде оставка, затова е в ареста), *dnevnik.bg*, 28 September 2025, https://www.dnevnik.bg/bulgaria/2025/09/28/4833765_deputat_ot_gerb_blagomir_kocev_ne_me_poslusha_da/

48 *See annual report on anti-corruption institutions of the Anti-Corruption Fund, supra note 35.*

about forthcoming investigations by the European Public Prosecutor's Office⁴⁹. The latter security breach of EU investigative data suggests also a breach of the principle of sincere cooperation between the Member State and the EU. To date, state institutions have failed to verify the information and to hold those involved accountable.

This leads to low levels of public trust in the work of the anticorruption institutions that receive significant funding from the state budget, i.e. the taxpayers' money.⁵⁰

It does not help that after the Commission for Anti-Corruption and the Forfeiture of Illegally Acquired Property was split into two institutions in 2023 (the Commission for the Forfeiture of Illegally Acquired Property and the Commission for Counteracting of Corruption, a.k.a. the Anti-Corruption Commission), the new bodies are yet to be constituted. The deadline for electing new leadership expired in January 2024. Meanwhile, under the leadership of its former deputy chair (now acting chair) Anton Slavchev, the Anti-Corruption Commission exercises its expanded powers⁵¹, joining the Prosecutor's Office in the selective application of repressive measures against opponents of Delyan Peevski.

Even more disturbing is the fact that the current acting Prosecutor General Borislav Sarafov retains his factual power despite the explicit legal prohibition.⁵²

Given the manifest indicators of institutional capture within the Bulgarian prosecution service and anticorruption institutions, the Commission should acknowledge that national authorities are currently incapable of impartial self-scrutiny. Consequently, we recommend that the Commission

49 *Mr. Grass Head's Holding Company: ACF Reveals Best-Kept Secret of Bulgaria's Energy Sector*, ACF, 28th May 2025, <https://acf.bg/en/holdingat-na-chichko-trevichko-razsl/>

50 Public attitudes towards corruption in Bulgaria and the anti-corruption actions of the Bulgarian Government. Results of a public perceptions survey 2024, Basel Institute of Governance, September 2024, <https://baselgovernance.org/sites/default/files/2024-09/240923%20Bulgaria%20public%20perceptions%20report%20FINAL.pdf>

51 For further details, see *“ACF Analyzes New Act on Preventing and Fighting Corruption: Creation of New Investigative Bodies Cannot Compensate Lack of Vision for Comprehensive Criminal Justice Reform”*, ACF, 23 October 2023, <https://acf.bg/en/analiz-na-akf-na-noviya-zakon-za-protivo/>; *The New Law on Combating Corruption: What Changes Should We Expect in the Activities of Detecting and Investigating Corruption Crimes* (‘Новият закон за противодействие на корупцията: каква промяна да очакваме в дейностите по разкриване и разследване на корупционни престъпления’), ACF, 2023, https://acf.bg/wp-content/uploads/2023/10/ZPK_web.pdf

52 *Supreme Court of Cassation removes Borislav Sarafov as acting chief prosecutor*, Bulgarian National Radio, 10 February 2025, <https://parliament140.bnr.bg/en/post/102219632/supreme-court-of-cassation-removes-borislav-sarafov-as-acting-chief-prosecutor>

facilitate direct oversight by the EPPO's central office in Luxembourg over all Bulgarian cases (at least those linked to the 'Orion' cartel). Furthermore, the Commission should initiate infringement proceedings against Bulgaria for failing to protect the integrity of EU investigative data, treating the leak not as an administrative error, but as a systemic breach of the Treaty obligations regarding the protection of the Union's financial interests. We recommend the activation of the Rule of Law Conditionality Mechanism, suspending EU funds linked to energy and infrastructure projects where the National Revenue Agency and financial regulators have failed to demonstrate effective oversight. The Commission must conclude that the risk to the EU budget is 'systemic' and that no national remedy is currently viable until the leadership of these 'captured' agencies is replaced through a transparent, internationally monitored process.

Regarding the EPPO scandal, the Commission should urge the Council of the European Union and the EPPO to conduct a comprehensive review of the selection and vetting procedures for European Prosecutors. Where there are credible allegations of undue influence by criminal or political networks over national selection processes, the EU must implement enhanced, independent background checks that bypass national security services if those services are suspected of institutional capture. Structural reforms should ensure that the appointment of high-level EU judicial officials is insulated from informal 'power brokers' at the national level, thereby safeguarding the de facto independence of the prosecutors.

A formal, independent audit of the Bulgarian EPPO Office should be initiated, covering its operational history since inception. This inquiry must go beyond administrative checks to include a thematic review of work allocation and the handling of high-profile cases involving politically exposed persons. Structurally, the EPPO should establish a permanent internal oversight mechanism tasked with identifying patterns of 'strategic inaction' or procedural delays in national offices. This should include an analysis of cases where national law enforcement institutions have systematically obstructed investigations, ensuring that such obstruction is formally documented and reported to the European Commission as a breach of the Principle of Sincere Cooperation.

The EPPO and the Commission must establish a robust protocol for the protection of European prosecutors against threats and intimidation from political and economic actors. In instances where a European Prosecutor alleges threats from high-profile political figures (such as those under international sanctions), the EU must ensure a fully independent, cross-border investigation into these claims. The failure of a Member State to provide genuine security or to investigate such threats must be considered a primary indicator of a breakdown in the Rule of Law.

With regard to the case against Varna mayor Blagomir Kotsev, the Commission should reiterate the urgent necessity for a comprehensive reform of the Supreme Judicial Council specifically regarding its composition and the method of selecting its members. To secure a truly independent judiciary,

the Judicial Chamber of the SJC must consist of a clear majority of judges elected directly by their peers, thereby mitigating the influence of the ‘political quota’ appointed by parliament. The reform must ensure that the Prosecutorial Chamber is also insulated from informal political ‘power brokers’, with selection processes that prioritise professional integrity over political loyalty. The Commission should monitor the correlation between criminal proceedings and political alignment, ensuring that anticorruption bodies do not function as de facto instruments for ‘reshaping’ the political landscape or enforcing loyalty to specific political factions.

MEDIA ENVIRONMENT AND MEDIA FREEDOM

General assessment

In 2025, Bulgaria showed no progress with the transposition and implementation of key EU legislation aimed at safeguarding press freedom and guaranteeing freedom and competitiveness of the media market. The country is lagging the implementation of EMFA and DSA, as noted by multiple reports, stated below, and has not yet transposed the EU anti-SLAPP directive, although vexatious lawsuits against journalists and civil society activists have become a persistent problem for the Bulgarian media and civil society. On the contrary, successful and failed attempts for amendments of the national legislation have posed threats of effectively limiting the opportunities for journalists in Bulgaria to independently practise their profession.

The conflict between the media regulator Council for Electronic Media (CEM) and the public broadcaster Bulgarian National Television (BNT) deepened in the past year, leaving the controversy over the appointment of a new DG of BNT still open. Despite the country's progress in the Reporters Without Borders ranking over the past few years, in 2025 we have witnessed concerning cases of overt political pressure and harassment of journalists.

Implementation of 2025 Commission recommendations

Recommendation: Complete the work aimed at improving transparency in the allocation of state advertising, in particular regarding state advertising contracted through intermediaries, such as media agencies (first made in 2022)

Despite Bulgaria having a stable government until December 2025, no particular progress in the field of transparency of state advertising or press freedom as a whole was achieved. The recommendation is relatively clear but still does not address another issue in regard to state advertising – funding media with unclear ownership which regularly breach the Code of Ethics. It has been noted multiple times that media that spread anti-EU and anti-democratic disinformation have access to state and EU public funding for communication, which is a consistent bad practice. At present, Bulgaria does not have a national regulatory body to oversee the allocation of state advertising funds to the media.

In order to fully address the existing challenges that the Bulgarian media environment faces in terms of access to state and EU advertising, the recommendation should cover not only the need for more transparency, but also for legal and procedural guarantees that taxpayer's money are not used for buying media comfort (especially on local level) and funding outlets that disseminate anti-democratic propaganda narratives.

Commission's 2025 assessment: Some progress

BHC's current assessment: No progress

Gaps in the Commission's Report

There are multiple issues that were covered in the Rule of Law Report, yet no concrete recommendations have been made. They include:

- Legal pressure against journalists in the form of SLAPPs
- Culture of pressure in the public and private media that leads to sacking journalists criticising the ruling parties and widespread self-censorship
- Slow progress in the transposition and implementation of key EU legislation aimed at protecting the rights of journalists, press freedom, democracy and the free market. This includes: the EU anti-SLAPP directive; the Media Freedom Act, the Digital Services Act and the AI act that enters into force in 2026.
- Proposition and/or introduction of legal amendments that could seriously impact the work of investigative reporters
- Increased hostility against journalists, also on highest political level, which leads to additional risks to the safety of journalists covering public events and online
- Widespread disinformation and harassment against fact checkers

In 2025, we saw an increasingly hostile environment against journalists and fact-checkers. Following Meta's decision to halt its funding to fact-checking operations in the US, fact-checking organisations in Bulgaria, namely Factcheck.bg, became a target of smear campaigns, threats and harassment.⁵³ In a number of cases, politicians directly attacked journalists for asking questions.⁵⁴ In fact, abusive attitude against journalists has become a regular practice in the Bulgarian Parliament, which led to the AEJ – Bulgaria calling for sanctions against MPs for offensive treatment of journalists. A number of the reported incidents throughout the year were linked to Delyan Peevski, a politician and business

53 AEJ-Bulgaria: Attacks on Factcheck.bg Show the Need for Fact-Checking ('Атаките срещу Factcheck.bg показват нуждата от проверка на факти'), 10 January 2024, <https://aej-bulgaria.org/factcheck-bg/>

54 AEJ-Bulgaria: MPs Owe Answers to Journalists ('Депутатите дължат отговори на журналистите'), 11 April 2025, <https://aej-bulgaria.org/?p=42730>

figure who has been sanctioned under the US anticorruption Magnitski act and member of his party – MRF New Beginning.⁵⁵

The sharp return of political pressure over the media – that we have been witnessing during the cycle of political instability, marked by a series of seven parliamentary elections until October 2024, – has continued throughout 2025. It resulted in the sacking of high-profile TV anchor Maria Tsantsarova⁵⁶ from the morning show of BTV – one of Bulgaria largest private TV channels owned by the Central European Media Enterprises (CME) that is owned by PPF Group N.V. Tsantsarova’s removal from air right before Christmas provoked two protests of journalists and citizens against the decision of the media companies BTV and CME and the resignation of Stoyan Georgiev – a top investigative reporter from the TV channel.

Notorious SLAPP cases include the one against the journalists Venelina Popova⁵⁷ (ordered in 2025 to pay costs and taxes for enforcement proceedings following unsuccessful appeal of denial to access to information decision), Boris Mitov and Mediapool⁵⁸ (journalist and media outlet against whom a 2025 final decision allowed a judge’s claim for reporting well-known facts), and Bird.bg⁵⁹ (an investigative media that announced in December 2025 that 20 court cases are pending against them amounting to about €250,000 in claims and no less than €25,000 in costs).

New Issues that Emerged in 2025

Proposed legal amendments challenge the independence of Bulgarian media and journalists

55 *AEJ-Bulgaria: MPs to Be Sanctioned for Offensive Behavior Towards Journalists* (‘Денятатуме да бъдат санкционирани за обидно поведение спрямо журналисти’), 31 January 2025, <https://aej-bulgaria.org/?p=42526>

56 *AEJ-Bulgaria: Top Bulgarian TV Anchor Taken Off Air Amid Fears of Political Interference*, 22 December 2025, <https://aej-bulgaria.org/en/top-bulgarian-tv-anchor-taken-off-air-amid-fears-of-political-interference/>

57 *Elitsa Simeonova: “A Desire to Be Punished”. How a Journalist Ended Up with Blocked Accounts Because of the Questions She Asked* (‘Елица Симеонова: “Желание да бъде наказана”. Как журналистка се оказа с блокирани сметки заради въпроси’), *svobodnaevropa.bg*, 5 September 2025, <https://www.svobodnaevropa.bg/a/zhurnalistka-venelina-popova-delo-galabovo-insinator-dostap-do-informatsiya/33522461.html>

58 *See the chapter on Bulgaria in Liberties’ 2022 Rule of Law Report*, p. 53.

59 *Strategic Lawsuits Against Public Participation (SLAPP) Totalling Half a Million Leva Filed Against Journalists from BIRD* (‘Дела шамари за половин милион лева срещу журналисти от BIRD’), *Bird.bg*, 8 December 2025, <https://bird.bg/slapp-dela/>

The Ministry of Justice has successfully pushed through amendments that would limit the issuance of uncertified copies of documents filed in the Property Register at the Registry Agency.⁶⁰ These are most often ownership deeds, but also mortgages, exchange contracts, public property contracts, etc. According to the amendments, to obtain a copy of such a deed, the applicant will have to prove a legal interest. The explanation is that this will limit access to ‘sensitive data’, such as personal identification numbers and bank accounts, to allegedly prevent property fraud.

Reducing transparency can hardly lead to limiting any abuses, including property fraud. However, such a restriction will deal a serious blow to investigative journalism. It will be deprived of an objective source of information – a tool that has helped to uncover hundreds of cases of corruption, conflict of interest, money laundering, tax violations, and mismanagement.

The controversial amendments were proposed right before the summer vacation and voted right before the New Year’s Eve, leaving little space for discussion, although they will seriously affect investigative journalism and anticorruption activism in Bulgaria.

In addition, on October 7, the populist There Is Such a People Party, a junior coalition partner in the governing coalition, introduced a bill to parliament that proposed amendments to the penal code that, if adopted, would have introduced prison sentences of up to six years and fines for disseminating personal information about an individual without their consent. The bill defined “personal life” broadly, covering personal, family, intimate relations or health status, and criminalised their disclosure through any medium, including print and online publications. The proposal also allowed for the use of special surveillance means, such as wiretaps, for investigating such offences, which are typically reserved for serious crimes. No exemptions were made for legitimate public interest journalism and journalist associations, and unions were not consulted. The following day, 8 October, the bill was approved at the first reading by the parliamentary Legal Affairs Committee. It was supported by members of the governing majority and opposition parties. Representatives of the Prosecutor’s Office and judiciary were not present due to the extraordinary and accelerated scheduling of the session. The bill was met with strong criticism from Bulgarian media, 9 journalist associations and international press freedom organisations, who warned it could be used to censor legitimate public interest journalism and risked jailing journalists for doing their job. The bill was later dropped on October 13 after the international outcry. However, the initial introduction of the bill and swift passing, without proper

60 *Elitsa Simeonova: War with the Mafia or with Transparency. Why the Government Has Restricted Access to Information About Properties* (‘Елица Симеонова: Война с мафията или с прозрачността. Защо правителството ограничава достъпа до информация за имоти’), 26 November 2025, <https://www.svobodnaevropa.bg/a/imoto-dostyp-informaciya-dokumenti/33606075.html>

public consultation, remains highly alarming. If ultimately passed, the bill would have shattered slow progress on criminal defamation reform in recent years.⁶¹

In 2025, the problem with the proper access of parliamentary reporters to the National Assembly and the MPs not only did not find a resolution but worsened.⁶²

In recent years, including 2025, journalists working for popular online platforms have been denied access to the building of the National Assembly. These cases fit into the broader context in which, for years, parliament has been implementing a policy that has led to limiting the transparency and access of journalists to its work. Since moving to the current building – the former Communist Party House, journalists have been deprived of the conditions they had in the original building of the Bulgarian parliament – the one on Narodno sabranie Square. In 2023, 85 parliamentary reporters sent an open letter to the leadership of the National Assembly, demanding that they be provided with better working conditions. However, the problem remains and even worsens.

AEJ-Bulgaria has issued a call on the National Assembly to clarify the rules for access to accreditation. This is also part of the broader issue of the lack of synchronised regulation of concepts such as media and journalism, in the context of the European Media Freedom Act, which came into force in August of this year.

Implications and Recommendations for 2026

So far, the Commission has focused solely on the issue of state advertising, which undoubtedly is distorting the Bulgarian media market. However, all the issues listed above have contributed to a fragile media environment, lacking the necessary legal safeguards for journalists, widespread disinformation that challenges the work of professional reporters and factcheckers, and overall lack of public trust in professional media which has detrimental effects on the democratic debate.

Suggested recommendation: The swift and robust implementation of EMFA as a key legal safeguard of a free, pluralistic and independent media market should be recommended as currently the implementation is stumbling.

61 *Council of Europe's Safety of Journalists Platform and the Media Freedom Rapid Response (MFRR): Bulgaria: Fragile Media Freedom Progress at Risk of Backsliding Without Urgent Reform, 2025*, <https://www.ecpmf.eu/wp-content/uploads/2025/10/MFRR-Bulgaria-Report-2025.pdf>

62 *AEJ-Bulgaria: Parliament Must Guarantee Equal Access for Journalists ('Парламентът трябва да гарантира равноправен достъп на журналисти')*, 23 October 2025, <https://aej-bulgaria.org/?p=43415>

Suggested recommendation: The Ministry of Justice should reconsider the new legislation and propose less restrictive measures that would both protect citizens against property scams and guard the public's right to know. The swift and robust implementation of EMFA as a key legal safeguard of a free, pluralistic and independent media market should be recommended, as currently the implementation is stumbling.

CHECKS AND BALANCES

General assessment

Two instances of flagrant violations in the legislative process in 2025 triggered widespread national protests that led to the resignation of the government in December. The first instance was in November and concerned the tabling and adoption of amendments in the Administrative Regulation of Economic Activities Related to Petroleum and Petroleum Products Act. A parliamentary committee passed these amendments in just 28 seconds, while the opposition was absent and had not been notified of the session of the committee. In a subsequent incident, the ruling parties attempted to fast-track the 2026 budget. On this occasion, the committee's session was halted when opposition MPs from the PPDB coalition entered the room to disrupt the proceedings in protest. Rather than a mere failure to advance, these extraordinary violations mark a clear regression in the rule of law, as they demonstrate a move away from established democratic standards towards a legislative environment where transparency and opposition rights are discarded for political expediency.

Implementation of 2025 Commission recommendations

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 (first made in 2023)

The recommendation is not important for improving the situation in a country like Bulgaria, which has serious systemic problems with the rule of law in its very core. The Commission sees this recommendation as a technical issue and cites that there are no formal rules on integrity checks and on incompatibilities of persons hired as advisers to senior political officials; no comprehensive code of conduct and enforcement mechanism for persons in top executive functions; fragmented integrity provisions for top executive functions; lack of clear rules for declaration of gifts to persons in top executive functions. The integrity of top-level public officials in Bulgaria is a political and cultural issue – even if these technical criteria were met, there would be no change in the very way the institutions in Bulgaria operate under oligarchical control. Instead, in order to achieve progress in this area, it is necessary for:

- a fundamental change through evolution of professional ethos and political culture in the very way public authority is exercised in Bulgaria

- comprehensive reform of the criminal justice system regarding in particular: 1) the structure of the Supreme Judicial Council and enforced in practice better selection criteria for its members; 2) the Prosecutor’s Office including its leadership, structure and forms of external control; 3) the rules of criminal procedure and substantive criminal law
- full audit of the Anti-Corruption Commission, followed by large-scale reform including its leadership, powers and forms of external control

Commission’s 2025 assessment: Some progress

BHC’s current assessment: No progress

Recommendation: Strengthen the quality of the legislative process by ensuring the use of public consultations and impact assessments for legislative initiatives by Parliament (first made in 2025)

The government has failed to take any substantive steps towards the implementation of this recommendation. On the contrary, there are evident signs of regression, as demonstrated by several instances where legislation flagrantly circumvented established parliamentary procedures, including crucial legislation on electoral process just three months ahead of preliminary elections. Furthermore, contentious policies have been fast-tracked despite significant criticism and grave concerns regarding fundamental issues, such as journalists’ access to information.

The legal framework should mandate public consultations for all draft legislation on a uniform basis, irrespective of the initiating institution—whether the executive or the legislature. Ideally, all bills should be published on a centralised public consultation portal. These requirements should also extend to amendments introduced between the first and second readings of a bill. Where an expedited legislative procedure is invoked, the framework must nonetheless provide for minimum safeguards, including the timely publication of the draft law and the formal notification of the opposition at every stage, whether in committee or prior to plenary votes.

Commission’s 2025 assessment: N/A

BHC’s current assessment: Backsliding

Gaps in the Commission’s Report

Legal framework for civil society led to a state of acute institutional hostility

In 2025, the Bulgarian legal framework for civil society maintained a formal alignment with European standards, yet the operational environment deteriorated into a state of acute institutional hostility. This regression was characterised by a persistent cycle of restrictive legislative initiatives, aggressive

political rhetoric against minority groups and independent media, and a systemic breakdown in cooperation between state bodies and the non-profit sector.

A primary driver of this tension was the repeated introduction of a Russian-style Foreign Agents Registration Act by the Revival Party (Vazrajidane).⁶³ This proposal sought to stigmatise any individual or entity receiving more than €500 in cumulative foreign funding within a year by barring them from public life, including access to schools, universities, and government ministries. The draft legislation mirrored the Hungarian Transparency Act previously struck down by the Court of Justice of the European Union, specifically targeting freedom of association and expression by prohibiting ‘agents’ from engaging in activities deemed capable of influencing domestic policy. Despite being rejected in plenary sessions twice, the bill’s frequent resurfacing created a permanent state of legal uncertainty for the civil society organisations.

New Issues that Emerged in 2025

The use of ‘accelerated’ procedures

The use of ‘accelerated’ procedures—including a 28-second committee vote for the Lukoil refinery and 45-minute notice for Electoral Code amendments, state-led “de facto nationalisation” of energy infrastructure (Lukoil), as well as efforts to restrict access to public property deeds and the use of “secret” working groups for electoral reform signal failure of checks and balances system in Bulgaria.

On 8 May 2025, the government approved a ‘Program for Exercising Rights over State-Owned Properties’. The program identified approximately 4,400 properties across the country that were deemed to be “no longer needed”.⁶⁴ The announcement turned into a scandal when the specific list of properties was leaked and mapped by the civil activists and blogger Boyan Yurukov. The list included national heritage (parts of the Roman Amphitheatre of Serdica in downtown Sofia), strategic zones (land located directly on the state border and parts of the Black Sea coastline), infrastructure and health (portions of active dams, and military barracks), green spaces (large plots in Sofia that were slated for construction instead of being turned into public parks).⁶⁵ In late July 2025, just before the summer

63 *The bill of the Foreign Agents Registration Act is available at <https://www.parliament.bg/bg/bills/ID/165804>*

64 *PM Zhelyazkov: Unused state property to be sold online, Bulgarian National Radio, 8 May 2025, <https://bnrnews.bg/en/post/132985/prime-minister-zhelyazkov-unused-state-property-to-be-sold-via-electronic-platform>*

65 *More Calls for Greater Transparency and Focus on Public Interest in Plans for Sale of 4,400 State-Owned Properties, Bulgarian Telegraph Agency, 12 August 2025, <https://www.bta.bg/en/news/bulgaria/947536-more-calls-for-greater-transparency-and-focus-on-public-interest-in-plans-for-sa>*

recess, the National Assembly passed amendments to the State Property Act.⁶⁶ These changes were designed to allow the sale of properties belonging to companies on the ‘forbidden list’ for privatisation without an explicit vote by MPs, simplify the procedure for selling assets managed by the Ministry of Defence, and move sales to an electronic platform that critics argued lacked sufficient transparency and favoured ‘insider’ buyers. The president vetoed the amendments⁶⁷ which was overridden in parliament without deliberations.⁶⁸

In August, the Ministry of Justice announced it is planning to tackle real estate fraud – an issue that was not a subject of public discussion in 2025 – by limiting access to uncertified copies of property deeds – documents intended to be public and widely used by journalists and civil society in corruption investigations.⁶⁹ Despite public criticism, the government successfully pushed the amendments forward.⁷⁰

Institutional harassment against civil society organisations reached a peak in November 2025 with the establishment of an ad hoc parliamentary committee tasked with investigating the foundations of George and Alexander Soros (Open Society Foundations).⁷¹ This committee, initiated by Delyan Peevski’s MRF party, was designed to map insinuated financial links between foundations and Bulgarian magistrates, media, and businesses, effectively weaponising parliamentary mechanisms to intimidate independent actors. Meanwhile, essential reforms committed to under the EU Recovery and Resilience Plan remained stalled. Although a controversial draft lobbying law—which had threatened to criminalise public advocacy as ‘indirect lobbying’—was withdrawn in early 2025, the Ministry of Justice failed to present a transparent alternative by the end of the year, leaving a critical gap in the country’s anticorruption and transparency framework.

66 Promulgated in State Gazette, Issue 74 of 9 September 2025.

67 Bulgarian President Radev vetoes amendments to State Property Act, *SofiaGlobe.com*, 11 August 2025, <https://sofiaglobe.com/2025/08/11/bulgarian-president-radev-vetoes-amendments-to-state-property-act/>

68 Bulgarian MPs override presidential veto of State Property Act amendments, *SofiaGlobe.com*, 4 September 2025, <https://sofiaglobe.com/2025/09/04/bulgarian-mps-override-presidential-veto-of-state-property-act-amendments/>

69 Elitsa Simeonova: War with the Mafia or with Transparency. Why the Government Has Restricted Access to Information About Properties (‘Елица Симеонова: Война с мафията или с прозрачността. Защо правителството ограничава достъпа до информация за имоти’), 26 November 2025, <https://www.svobodnaevropa.bg/a/imo-ti-dostyp-informaciya-dokumenti/33606075.html>

70 See section Media Environment and Media Freedom above.

71 The parliament’s decision to establish the committee is available at <https://www.parliament.bg/bg/decision/ID/166709>

In a further escalation, the Revival Party introduced⁷² amendments to the Pre-School and School Education Act proposing punitive fines of between €5,000 and €10,000 for foreign-funded CSOs engaging with students or faculty. These measures, tabled before the bill's second reading, target organisations receiving at least 50% of their revenue from abroad and represent a significant threat to the EU-guaranteed freedom of association. By seeking to criminalise educational outreach based on funding sources, these amendments contribute to the systemic stigmatisation of civil society and likely constitute a breach of fundamental EU rights regarding the free movement of services and capital. The bill did not reach second reading vote in the reported period.

On 7 November, the ruling coalition sparked a significant controversy by passing amendments to the Administrative Regulation of Economic Activities Related to Oil and Petroleum Products Act in a process that lasted only 28 seconds.⁷³ The legislation was pushed through during the second reading with no debate, no reading of the texts aloud, and almost instantaneous voting in a parliamentary committee. This rapid procedure was specifically designed to appoint a special commercial administrator with expansive powers over the Lukoil Neftohim Burgas refinery – one of the largest oil refineries in the Balkans and the largest industrial enterprise in Bulgaria, owned by Russian oil giant LUKOIL. The amendments effectively stripped the Russian owners of their voting and management rights to pre-empt the impact of US-imposed sanctions. The legislation, which some opposition members labelled a “de facto nationalisation”, allows this state-appointed manager to oversee operations and even initiate the sale of the refinery's assets, with the current owners losing their right to appeal these administrative decisions.⁷⁴

In the meantime, the government introduced the first draft budget in euros for 2026. It sparked widespread outrage due to proposed tax hikes, including a two-percentage-point increase in social security contributions and a doubling of the dividend tax. These measures, combined with a lack of dialogue with social partners, led to mass street protests involving tens of thousands of people in Sofia and other major cities. The session of the Parliamentary Budget Committee on 26 November resulted in intense clashes and was ultimately interrupted by the opposition coalition, PP-DB. The coalition criticized the opaque manner in which the legislation was advanced and warned that the proposed measures posed a significant risk of a high fiscal deficit in 2026.⁷⁵ Several massive national

72 Proposal no. 51-554-04-330 of 5 November 2025, available at <https://www.parliament.bg/bills/51/51-554-04-330.pdf>

73 Video from the vote is available at <https://www.facebook.com/watch/?v=1522619672259306>.

74 Aleksandra Sotirova-Delcheva: On an unprecedented fast track: The state partially nationalizes Lukoil, *Economic.bg*, 7 November 2025, <https://www.economic.bg/en/a/view/on-an-unprecedented-fast-track-the-state-partially-nationalizes-lukoil>

75 Scandal in the Committee on Budget and Finance: PP-DB block the session (‘Скандал в Комисията по бюджет и финанси, ПП-ДБ блокираха заседанието’), *vesti.bg*, 26 November 2025, <https://www.vesti.bg/bulgaria/skan-dal-v-komisiyata-po-biudzhnet-i-finansi-pp-db-blokiraha-zasedaniето-videosnimki-6245127>

protests followed, with hundreds of thousands of people participating and a blockade of the National Assembly. Under immense public and political pressure, the government was forced to permanently withdraw the 2026 budget package and subsequently resigned on 11 December 2025. Ultimately, parliament unanimously voted to send the budget back for revision, reverting to a temporary spending framework to ensure financial stability as the country entered the Eurozone in January 2026.⁷⁶

In January 2025, five political parties introduced distinct draft bills to amend the Electoral Code. These proposals were consolidated into a single bill and referred to an expert working group, which was subsequently dissolved in April without a clear timeline for further review. Following the government's collapse in December, a member of the ruling coalition unexpectedly announced that a new working group had been reviewing the legislation in secret until early December, and that the bill would be tabled before the end of the year. According to the news outlet Dnevnik, both opposition MPs and independent experts stated they had been neither informed of nor invited to participate in this group. On 15 January 2026, Dnevnik reported that parliament was proceeding to a second-reading vote during an extraordinary committee session scheduled that same day by the ruling coalition. Crucially, the consolidated report containing the final versions of the provisions was published only 45 minutes before the session, effectively precluding any meaningful public or stakeholder scrutiny. The proposed amendments are substantive and highly controversial, including: the abolition of machine voting in favour of ballot-counting scanners; the setting of technical specifications for scanners to be procured just three months prior to the forthcoming preliminary elections; the termination of access to the software's source code ten days before election day; and the removal of safeguards against the use of pre-filled ballots.⁷⁷ At the time of finalising this report, the legislative process remains ongoing. During a session on 19 January 2026, ruling coalition MPs attempted to close debates on numerous provisions without a vote—a tactic designed to bypass quorum requirements. Consequently, discussions on 55 of the 222 amended provisions were closed without adequate deliberation.⁷⁸

76 *After massive protest the ruling coalition freezes budget for 2026*, Bulgarian National Radio, 28 November 2025, <https://bnrnews.bg/en/post/392929/after-massive-protest-the-ruling-coalition-freezes-budget-for-2026>

77 Yordanka Veselinova: *The Secret Working Group of the Ruling Party Has Prepared the Elimination of Machine Voting* (Йорданка Веселинова: Тайната работна група на управляващите е подготвила ликвидирането на машинното гласуване'), Dnevnik.bg, 15 January 2026, <https://www.dnevnik.bg/4873029>

78 *The Legal Committee Has Completed Its Work for the Day* ('Правната комисия приключи работата си за днес'), Dnevnik.bg, 19 January 2026, https://www.dnevnik.bg/politika/2026/01/14/4872647_zapochva_novoto_prekrojavane_na_izbornite_pravila/#4874463

Implications and Recommendations for 2026

Notwithstanding the failure to adopt the Foreign Agents Registration Act, the initiative serves to complement a broader suite of measures targeting civil society (see New Issues below). This approach mirrors the strategy successfully deployed in 2024, characterised by the repeated and systematic introduction of anti-LGBTI amendments to the Pre-School and School Education Act⁷⁹—a tactic that has already demonstrated its efficacy.

Regarding new issues that arose during 2025, Bulgaria should adopt and strictly enforce mandatory minimum timeframes for the publication of legislative reports, including the consolidated ones of proposals between committee stages and plenary votes. Legislation should not only contain a requirement for a formal ‘Statement of Consultation’ to accompany all bills, proving that civil society and relevant stakeholders were given adequate time to review texts, but also contain procedural safeguards that incompatibility with these requirements is attached to consequences in regard to adoption of the bill or the legality of the adopted legislation.

While the Treaties do not offer explicit legal bases that allow the EU to harmonize national democratic processes or set out common democratic standards, fair elections for national parliament are source of legitimacy of EU institutions whose composition and operations are based on national institutions like the government. Hence, the Commission should indicate that in line with Venice Commission standards, Bulgaria must refrain from adopting fundamental changes to the Electoral Code less than one year before a general election.

The Commission should monitor the use of ad hoc parliamentary committees to ensure they are not weaponised to intimidate independent civil society actors or magistrates.

Suggested recommendation: The Commission should urge the Bulgarian authorities to ensure a stable and enabling environment for civil society by refraining from the introduction of legislation that stigmatises non-governmental organisations (NGOs) based on their funding sources.

Suggested recommendation: The government must move forward with transparency and lobbying reforms in full consultation with the non-profit sector, ensuring that such regulations do not criminalise legitimate public advocacy or infringe upon the freedom of association.

⁷⁹ See the chapter on Bulgaria in *Liberties’ 2025 Rule of Law Report*, p. 168.

CONTACTS

Bulgarian Helsinki Committee

The Bulgarian Helsinki Committee (BHC) is an independent, non-governmental, not-for-profit civil society organisation for defending fundamental human rights in Bulgaria: political, civil, cultural, and social. It was established in 1992. Among other things, the organisation works in the field of rule of law and independence of the judiciary.

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The Civil Liberties Union for Europe

The Civil Liberties Union for Europe (Liberties) is a non-governmental organisation promoting the civil liberties of everyone in the European Union. We are headquartered in Berlin and have a presence in Brussels. Liberties is built on a network of 24 national civil liberties NGOs from across the EU.

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