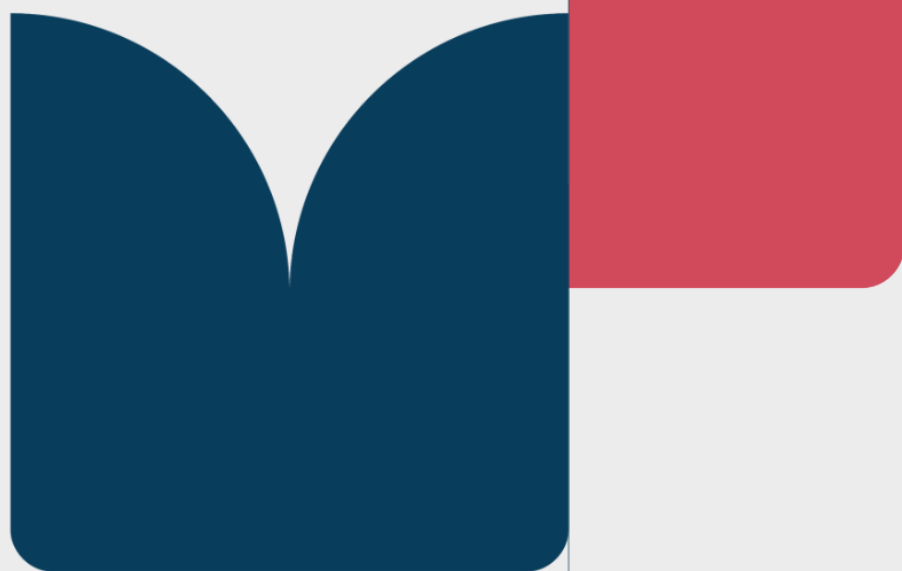


# Monitoring Action for Civic Space



## Country report

**BULGARIA**

December 2025



# About this report

**Authors:** The Bulgarian Center for Not-for-Profit Law (BCNL) is a public-benefit foundation that provides support for the drafting and implementation of legislation and policies aiming to advance civil society, civic participation, and good governance in Bulgaria. We have participated in the development and discussion of a number of laws related to the activities of non-profit organisations, such as the Law on Non-Profit Legal Entities, the Social Assistance Act, the Law on Normative Acts, Anti-money Laundering Measures Act and many others. More about us and our work can be found at [www.bcnl.org](http://www.bcnl.org).



**Acknowledgements:** This report was drafted by Zahari Iankov – legal expert at BCNL and edited by Nadia Shabani – Director of BCNL. The BCNL's team members Aylin Yumerova, Radina Banova, Svetlana Georgieva and Plamen Todorov contributed to the desk research for the report. BCNL is grateful to the experts from America for Bulgaria Foundation, the Civic Participation Forum, the National Network for Children, Teach for Bulgaria Foundation, Open Society Sofia Foundation, the Bulgarian Helsinki Committee, the LGBTIQ+ organisation “Deystvie,” WWF Bulgaria and Association of the European Journalist Bulgaria for participating in the scoring expert hub and for sharing their expertise and insights.

**Reporting period:** January-December 2025



## Co-funded by the European Union

Co-funded by the European Union. Views and opinions expressed are those of the author(s) only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor the granting authority can be held responsible for them.



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The MACS: Monitoring Action for Civic Space project is implemented by the European Center for Not-for-Profit Law (ECNPL), European Civic Forum, Bulgarian Center for Not-for-Profit Law, Foreningen Nyt Europa, Le Mouvement associatif, Okotárs Alapítvány, Stichting Nederlands Helsinki Comité, Ogólnopolska Federacja Organizacji Pozarządowych, Fundația pentru Dezvoltarea Societății Civile.



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# Key developments

## Bulgaria - civic space in times of political crisis

Bulgaria has been in a political crisis since 2021, marked by a series of inconclusive elections, historically low voter turnout in the June 2024 elections,<sup>1</sup> a major party split,<sup>2</sup> fraud scandals that plagued the 2024 October<sup>3</sup> elections, and arrests of high-ranking politicians in 2024 and 2025, coined by some as politically-motivated repressions.<sup>4</sup>

In early 2025, a new government was formed, including ministers from three political parties – GERB,<sup>5</sup> There is Such People, and the Bulgarian Socialist Party. The Movement for Rights and Freedoms – New Beginning Party (DPS), led by Delyan Peevski who is sanctioned under the Global Magnitsky Act, a U.S. law that imposes sanctions on individuals involved in serious human rights violations or corruption, was expelled from the Renew Europe Party in late 2024<sup>6</sup> and does not participate in the government. Nevertheless, the DPS Party's ever-growing influence, combined with various other social problems, led to the biggest anti-government protest in recent years in early December 2025.<sup>7</sup> Protesters demanded a new State Budget Bill and called for the resignation of the government, clearly demonstrating that the political crisis is far from over.

Additionally, in 2025, Bulgaria was approved to adopt the Euro on 1 January 2026. This led to yet another division in Bulgarian society, reinvigorating the far-right political parties' anti-EU campaigns. During an anti-EU protest organised by the Revival Party in February, the EU office in Sofia was vandalised by members of Parliament (MPs) and demonstrators.<sup>8</sup>

This turmoil has resulted in a deepening institutional crisis affecting the judiciary, regulatory bodies, and civic space.

During 2025, Bulgaria's civic space<sup>9</sup> remained narrowed, marked by a mix of minor positive institutional steps and persistent, and in some cases growing, institutional and political pressures affecting civil society organisations (CSOs), journalists, activists and marginalised groups.

Smear campaigns against Bulgarian CSOs, led by politicians abusing parliamentary procedures, continued in 2025. The Russian-style legislation on “foreign agents” was once more on the agenda of the National Assembly at the beginning of the year. New

<sup>1</sup> <https://boulevardbulgaria.bg/articles/tsik-otchete-nay-niskata-izbiratelna-aktivnost-ot-1990-g-nasam>

<sup>2</sup> <https://www.segabg.com/hot/category-bulgaria/parlamentarnata-grupa-na-dps-se-razcepi>

<sup>3</sup> <https://www.svobodnaevropa.bg/a/peevski-chadur-mvr-samnenia-kupuvane-glasove/33166812.html>

<sup>4</sup> <https://www.reneweuropengroup.eu/news/2025-07-12/renew-europe-condemns-worsening-political-persecution-and-rule-of-law-backsliding-in-bulgaria>

<sup>5</sup> Full name - Citizens for European Development of Bulgaria (Граждани за европейско развитие на България)

<sup>6</sup> <https://www.reneweuropengroup.eu/news/2024-12-22/exclusion-of-the-dps-party-from-the-renew-europe-group>

<sup>7</sup> <https://www.focus-news.net/novini/mejdunarodni/Edin-ot-nai-golemite-protesti-ot-1989-ta-nasam-Zapadnite-medii-otraziha-protestite-v-Bulgariya-2806219>

<sup>8</sup> <https://www.politico.eu/article/anti-eu-protesters-storm-eu-mission-offices-bulgaria-sofia/>

<sup>9</sup> According to the Civicus Monitor, available here: <https://monitor.civicus.org/country/bulgaria/>



attempts to further restrict the work of CSOs in schools were also made, and after several failed attempts in late 2025, Parliament voted to create an *ad-hoc* committee to investigate “Soros-funded” CSOs and media outlets, implying that they have been a source of malign influence “aiming to establish dictatorship”.<sup>10</sup>

Meanwhile, the right to participate in decision-making was not fully respected in Parliament through multiple abuses of procedures that prevented public participation. The procedures included fast-tracking legislation, skipping discussions in the committees, last-minute cancelling or postponing of committee meetings<sup>11</sup> as well as instances of the Chair of the Parliament preventing citizens and CSOs from taking part in discussions and from entering the Parliament building.<sup>12</sup> Other mechanisms to ensure dialogue between civil society and decision makers, such as the consultative bodies, remained either non-functional or functioned with delay. For instance, the Civil Society Development Council (CSDC) to the Council of Ministers had its first meeting only five months after its election.<sup>13</sup> Since September, however, it has functioned regularly.

Progress was made on the drafting of a representation of interests law (also referred to as a Lobbying Law) after an early draft, discussed in late 2024,<sup>14</sup> proposed measures to disproportionately burden CSOs and activists. Following pushback from CSOs, the newly appointed Minister of Justice committed to engaging with civil society and agreed to remove the most controversial proposals in the draft law. By the end of 2025, however, a draft had not yet been presented for public consultation.

After the adoption of a ban on the “propaganda of ideas and views related to non-traditional sexual orientation” in schools in 2024,<sup>15</sup> new discriminatory measures were proposed in Parliament,<sup>16</sup> while legal safeguards against hate speech based on sexual orientation remain ineffective. In contrast to previous years, however, no serious incidents or attacks were observed during the Sofia Pride and the related events in 2025.

Media freedom remains under threat. After a slight improvement in 2024, in 2025, however, Bulgaria once again ranked among the lowest EU countries in the Reporters Without Borders (RSF) World Press Freedom Index.<sup>17</sup> The EU Anti-SLAPP Directive is still in the early stage of transposition, with no legal measures presented for public consultation.<sup>18</sup> In a positive development, the long-overdue reforms to implement the Digital Services Act were adopted at the end of 2025.<sup>19</sup>

<sup>10</sup> See the motives to decision to establish the Committee, here: [https://www.parliament.bg/bg/ns\\_acts/ID/166709](https://www.parliament.bg/bg/ns_acts/ID/166709)

<sup>11</sup> See for example: <https://clubz.bg/167612> ;

[https://www.dnevnik.bg/politika/2025/07/31/4814407\\_bez\\_kvorum\\_i\\_v\\_razrez\\_s\\_vsichki\\_pravila\\_deputatite/](https://www.dnevnik.bg/politika/2025/07/31/4814407_bez_kvorum_i_v_razrez_s_vsichki_pravila_deputatite/) ;  
<https://boulevardbulgaria.bg/articles/ppdb-blokiraha-opita-na-gerb-i-dps-da-glasuvat-byudzhnet-v-obednata-pochivka>

<sup>12</sup> See additional information here: <https://clubz.bg/166083>

<sup>13</sup> <https://www.gov.bg/special/bg/prestentor/novini/savetat-za-razvitie-na-grazhdanskoto-obshtestvo-initsiira-sazdavaneto-na-strategiya-za-podkrepa-na-razvitiето-na-grazhdanskite-organizatsii-v-bulgaria>

<sup>14</sup> <https://bcnl.org/trainings/krivorazbrana-ideya-za-zakon-za-lobizma-zaplashva-grazhdanskite-svobodi>

<sup>15</sup> See art. 11 of the Pre-School and School Act, available here: <https://bcnl.org/trainings/krivorazbrana-ideya-za-zakon-za-lobizma-zaplashva-grazhdanskite-svobodi>

<sup>16</sup> Bill available here: <https://www.parliament.bg/bg/bills/ID/165835>

<sup>17</sup> Freedom press index for Bulgaria, available here: <https://rsf.org/en/country/bulgaria>

<sup>18</sup> More information available here: <https://shorturl.at/ol6mB>

<sup>19</sup> The bill implementing the DSA, available here: <https://www.parliament.bg/bg/bills/ID/166496>



# Dimensions

## 1. Freedom of Association

Freedom of association in Bulgaria is formally guaranteed by the Constitution and the Non-Profit Legal Persons Act, allowing both Bulgarian and foreign individuals and entities to form CSOs, including informal groups. While the legal framework provides clear procedures, low fees, and accessible digital registration, in practice, the Registry Agency frequently issues inconsistent instructions and maintains a high rate of refusals. There has been a long-standing denial of registration to organisations advocating for the Macedonian minority, despite repeated European Court of Human Rights (ECtHR) judgments. Additional pressures on civic actors intensified in 2025, including renewed attempts to introduce a Russian-style “foreign agents” law, municipal restrictions on fundraising, ad hoc parliamentary committees targeting CSOs, and public attacks on groups assisting migrants. These developments collectively illustrate an environment where legal rights exist in principle but are increasingly undermined by administrative arbitrariness, political stigmatisation, and targeted harassment.

In Bulgaria, freedom of association is recognised as one of the fundamental rights of citizens at the level of the Constitution,<sup>20</sup> general law (Non-Profit Legal Persons Act – NPLPA),<sup>21</sup> and a number of special laws. This right is exercised through the formation of legal entities (associations, foundations, community centres<sup>22</sup>) with various non-profit goals such as educational, human rights, religious, etc. The law allows for the right of association to be exercised through informal civil society groups.

With regard to the accessibility of the right to association, there is the following distinction: legal requirements and recognition exist for legal entities. Some informal groups receive limited legal recognition under special laws, for example, youth groups.<sup>23</sup> According to the NPLPA, founders of a non-profit legal entity can be Bulgarian by nationality, foreign legal entities and/or natural persons with legal capacity. In other words, any established legal entity and any natural person, regardless of nationality, who is over 18 years of age and is not under legal guardianship, may be a founder of a CSO. This provision on guardianship contravenes Article 29 of the Convention on the Rights of Persons with Disabilities,<sup>24</sup> ratified by Bulgaria, and which guarantees the right of people with disabilities to participate in non-governmental organisations and associations and to form and join organisations of persons with disabilities.

Although there are no restrictions on foreigners establishing CSOs in Bulgaria, non-EU citizens cannot obtain long-term residence permits based on their intention to carry out non-profit activities. This was included in an amendment to the Foreigners in the

<sup>20</sup> Art. 12 of the Constitution, available here: <https://www.parliament.bg/bg/const>

<sup>21</sup> Available here: <https://lex.bg/laws/ldoc/2134942720>

<sup>22</sup> Community center in this report refers to a special kind of traditional community centers for Bulgaria NPOs called *читалища/chitalishta*. They are regulated by a special law – The Law on Peoples Community Centers, available here: <https://lex.bg/laws/ldoc/2133897729>

<sup>23</sup> See Chapter Three of the Youth Act; available here: <https://lex.bg/laws/ldoc/2135786802>

<sup>24</sup> Available here: <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-persons-disabilities>



Republic of Bulgaria Act,<sup>25</sup> adopted in June 2025. Although the government cited the low number of applications for long-term residency (just 486 since 2002) as a justification for the amendment, a MP from the centre-right majority GERB Party openly argued that the change aims to prevent foreigners from using not-for-profit organisations as a route to residency. Following the adoption of the amendment, non-EU citizens are not prohibited from establishing CSOs or from working in the civil society sector with a labour contract. However, the amendment limits non-EU citizens from obtaining permanent residency for being a director of a CSO without a work contract. The law could become discriminatory as there is an option for permanent residency for non-EU citizens engaged in religious activities or self-employed, but not for non-profit activities.<sup>26</sup>

The legal steps in the process of establishing a civil society organisation are clear, and the necessary documents and grounds for refusal are specified. The procedure for appealing a refusal is also clear and easy for the applicant: an appeal is submitted through the Registry Agency to the relevant district court and the decision-making process takes about two months. The decision of the district court may be appealed to the upper court of appeals, which rules on a final decision.

Documents can be submitted on paper to the Registry Agency office located in each district city or electronically.<sup>27</sup> The application forms come with instructions. The registration fee for submitting the documents by paper is €25, and the fee for electronic submission is half that amount. The appeal fee is equal to half of the paid registration fee. The procedure is quick, taking from one day for new registration to three days for changes to the registration file of an already established legal entity.

In practice, however, there are inconsistencies in the implementation of the lawful procedures, leading to a high number of refusals of initial registration or changes in a legal entity's files.<sup>28</sup> A major issue is the unclear instructions that the Registry Agency issues, paired with, in some cases, unrealistic deadlines. For instance, the Registry Agency continues to instruct CSOs to provide copies of documents "without personal data except the personal data required by law". This blanket requirement does not comply with the information provision for processing personal data required by GDPR and leads to confusion and uncertainty amongst the applicants on how to comply. Despite that, it is the only guidance provided in the "Instructions for initial registration of associations in the register of non-profit legal entities," issued in 2025 by the Registry Agency.<sup>29</sup>

CSOs can freely determine their objectives, the purpose of their activities (private or public), and whether they will pursue economic activities. According to the law, the state might intervene and terminate a CSO if it is not lawfully established; it carries out activities in breach of the law, Constitution or public morals; or in the case where the CSO is included in the list of entities and people connected to terrorism financing.<sup>30</sup>

<sup>25</sup> Amendment to art. 24, paragraph 1, point 16 of the Foreigners in the Republic of Bulgaria Act, available here: <https://lex.bg/laws/ldoc/2134455296>

<sup>26</sup> See more here: <https://civicspacewatch.eu/bulgaria-change-in-law-limits-residence-permits-for-non-eu-citizens-engaged-in-civil-society-work/>

<sup>27</sup> The registration procedure is regulated in the Law on the Commercial Register And the Register Of Non-Profit Legal Entities; available here: [https://www.registryagency.bg/media/filer\\_public/2021/03/22/zakon\\_za\\_trgovskia\\_registr\\_i\\_registra\\_na\\_iulnts.pdf](https://www.registryagency.bg/media/filer_public/2021/03/22/zakon_za_trgovskia_registr_i_registra_na_iulnts.pdf)

<sup>28</sup> Information provided by the Registry Agency after an access to information request shows that in 2025 out of 590 submissions for initial registration 458 got refusal and for foundations – 240 out of 283 got refusals.

<sup>29</sup> Available here: <https://portal.registryagency.bg/preview-news/208>

<sup>30</sup> See art. 13 of NPLPA, available here: <https://lex.bg/laws/ldoc/2134942720>



A major violation of the freedom of association remains the issue of organisations advocating for Macedonian minority rights being denied registration.<sup>31</sup> Since 1999, Bulgaria has been found in violation of the freedom of association (Art. 11 of the European Convention on Human Rights) by the ECtHR in what is now known as the group of cases – United Macedonian Organisation Ilinden and others v. Bulgaria.<sup>32</sup> As of February 2024, there were 24 applications concerning this violation, pending a decision by the ECtHR.<sup>33</sup> In 2025, the Bulgarian government reported some progress, including issuing guidelines, conducting training, and considering legislative changes that did not result in any legislative amendments.<sup>34</sup> Despite this, civil society watchdogs report that the issue of freedom of association is far from resolved. CSOs are calling for the Committee of Ministers “to continue monitoring Bulgaria until the country implements the decisions of the Court and ensures unhindered registration of Macedonian organisations”.<sup>35</sup>

Most Bulgarian CSOs are obliged persons under anti-money laundering and countering financing of terrorism legislation (EU AML/CFT Directives).<sup>36</sup> CSOs have additional administrative obligations, including the obligation to carry out AML/CFT risk assessments and to adopt internal rules for AML/CFT if their annual turnover exceeds 25,000 EUR. Given this low threshold, even smaller, grassroots organisations could be obligated to report. Additionally, CSOs face increased AML/CFT monitoring by the banks when opening and maintaining bank accounts, although the country’s Non-Profit Organisations Sectoral Risk Assessment concluded that there is a low to medium risk of the Bulgarian civil society sector being complicit in terrorism financing.<sup>37</sup> Nonetheless, this has resulted in banks refusing to open bank accounts for organisations, banks requiring excessive fees for reviewing applications for opening bank accounts, and instances of blocking existing bank accounts, whilst demanding excessive documentation.<sup>38</sup>

On a municipal level, the Sofia Municipality’s Ordinance for Public Order continues to restrict civil society activities, as it bans CSOs in private benefit and informal groups from collecting donations at public venues and requires CSOs in public benefit to acquire permission to do so from the relevant mayor. And it has banned informal groups from carrying out such activity altogether.<sup>39</sup>

In early 2025, a Russian-style Foreign Agents Registration Act (FARA)<sup>40</sup> was once again on the Parliament’s agenda.<sup>41</sup> The bill introduces prohibitions and restrictions on civil society and independent media. According to the proposal, “foreign agents” (defined as a person or entity which has received funds, goods or services from abroad cumulatively exceeding 500 EUR within a year) and persons associated with them are prohibited from implementing activities in public institutions, such as schools, kindergartens, public and

<sup>31</sup> <https://www.einnetwork.org/blog-five/ein-civil-society-briefing-december-2025-bulgaria-hungary-north-macedonia-and-poland>

<sup>32</sup> For more information see: Two decades of violation of the right of association – the case of United Macedonian Organisation: Ilinden and others against Bulgaria, <https://bcnl.org/en/two-decades-of-violation-of-the-right-of-association-the-case-of-united-macedonian-organisation-ilinden-and-others-against-bulgaria>

<sup>33</sup> <https://hudoc.echr.coe.int/eng?i=001-231511>, <https://hudoc.echr.coe.int/eng?i=001-231509>, <https://hudoc.echr.coe.int/eng?i=001-231510>

<sup>34</sup> [https://hudoc.exec.coe.int/?i=DH-DD\(2025\)813E](https://hudoc.exec.coe.int/?i=DH-DD(2025)813E)

<sup>35</sup> <https://efaparty.eu/news/council-of-europe-monitor-closely-minority-rights-in-bulgaria>

<sup>36</sup> The scope of obliged CSOs is based on the NPO definition set by Recommendation 8 of FATF, available here: <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/protecting-non-profits-abuse-implementation-R8.html>

<sup>37</sup> Results of the NPO Sectoral Risk Assessment, available here: <https://www.dans.bg/bg/78>

<sup>38</sup> Information collected by BCNL in the course of its provision of consultations with CSOs.

<sup>39</sup> See art. 3, point 10 of the ordinance available here: <https://sofia.obshtini.bg/doc/3792691/0>

<sup>40</sup> The latest FARA proposal available here: <https://www.parliament.bg/bg/bills/ID/165804>

<sup>41</sup> The FARA was proposed between 2022 and 2025 in four Parliaments



private universities, the Ministries of Interior and Defence and the Bulgarian Academy of Sciences. It imposes restrictions on political rights and freedom of expression, prohibiting state-labelled “agents” from participating in political activities or actions which might influence the domestic or foreign policy of the country. It is also envisaged that once a person or entity is designated as an “agent”, they are labelled as such for five years, even after ceasing to receive foreign assistance. The Bulgarian version of the FARA law is clearly designed to restrict civil society and to exclude people labelled as “agents” from public life.<sup>42</sup> It contains the main characteristics of the Hungarian Transparency Act, which was found by the Court of Justice of the European Union to violate the free movement of capital and to infringe the rights to freedom of association, respect for private life, and protection of personal data, as enshrined in the EU Charter of Fundamental Rights. The FARA-like bill has been proposed four times since 2024 and it was rejected twice in plenary: in 2024, when all parliamentary groups, except two boycotted the plenary, and in 2025 when all parliamentary groups were present.

Later in 2025, the Revival Party, which also authored the FARA-like bill, proposed to impose fines between 5,000 and 10,000 EUR on foreign CSOs or CSOs receiving at least 50% of their funding from abroad and if they carry out any activities with students or school personnel, which would breach the freedom of movement and fundamental rights guaranteed by EU law.<sup>43</sup> The proposal came before the second reading of the major reform to the Pre-School and School Education Act proposed by the government.<sup>44</sup> The pending proposal would not only limit the freedom of association, if adopted, but would also serve as part of a broader campaign to stigmatise the foreign funding of CSOs. The same reform envisages the introduction of an obligatory school subject on “virtues and religion”. This provoked heated public debate, during which CSOs were targeted by supporters of the idea.<sup>45</sup> During the first reading of the reform by the Educational Committee in Parliament, the Committee chair, as well as other MPs, belittled and questioned the legitimacy of student council representatives who were against the new school subject, disregarding the right of young people to participate in decision-making processes and the right of students to associate.<sup>46</sup>

In November 2025, Parliament established an *ad hoc* committee “to establish facts and circumstances regarding the activities of George Soros and Alexander Soros and their foundations in the Republic of Bulgaria, financing Bulgarian individuals, legal entities, and non-governmental organisations, as well as establishing their connections with political parties, magistrates, educational institutions, media, business structures, and state authorities”.<sup>47</sup> The committee was established after several previous failed attempts during the year and is yet another instance of utilising parliamentary procedure against the civil society sector in Bulgaria. The committee is expected to summon citizens and representatives of CSOs and to produce a report on activities connected to Soros. As of December 2025, the committee had one failed meeting due to a lack of a quorum.

In 2025, the authorities harassed organisations and their volunteers helping migrants. After the deaths of three migrants in the Bulgarian mountains in late 2024, the

<sup>42</sup> See details about the latest version of the FARA law proposed in Bulgaria in September 2024: <https://bcnl.org/news/zakonat-sreshtu-grazhdanskite-svobodni-nova-ataka-sreshtu-grazhdanskite-prava.html>

<sup>43</sup> <https://civicspacewatch.eu/bulgaria-proposed-ban-on-foreign-funded-cso-activities-in-schools/>

<sup>44</sup> Proposal with entry number 51-554-04-330; Bill available here: <https://www.parliament.bg/bg/bills/ID/166550>

<sup>45</sup> See for example recording of a debate organised by the Ministry of Education, available here:

<https://www.youtube.com/watch?v=zH5PkFMhBDM>

<sup>46</sup> See more information here: <https://www.svobodnaevropa.bg/a/deputati-uchenitsi-samoupravlenie-zakon-obrazovanie/33492041.html>

<sup>47</sup> The decision for the establishment of the Committee: <https://www.parliament.bg/bg/decision/ID/166709>; more information available here: <https://civicspacewatch.eu/bulgaria-parliament-establishes-commission-targeting-soros-funded-csos/>



Bulgarian organisation Mission Wings accused the Ministry of Interior for failing to take proper actions to save the victims, despite multiple calls for help by activists from the organisation.<sup>48</sup> In January 2025, the Ministry announced that it would investigate the activists for false calls for help, claiming that Mission Wings obstructed the work of the authorities.<sup>49</sup> Later in 2025, Interior Minister Daniel Mitev told *The Times* that Mission Wings had been misused by Russian spies with the aim of “flooding”<sup>50</sup> Europe with migrants.<sup>51</sup> In November 2025, however, FRONTEX concluded in a report that the Bulgarian authorities had not taken appropriate measures to save the three migrants, despite being aware of their situation.<sup>52</sup>

Overall, Bulgaria’s legal framework continues to recognise freedom of association, but persistent administrative obstacles, political pressure, and repeated attempts to stigmatise or restrict CSOs undermine the full exercise of the right.

## 2. Freedom of Peaceful Assembly

Peaceful assembly in Bulgaria remains legally protected under a stable notification-based process, with spontaneous protests generally tolerated and no systematic misuse of restrictive provisions. However, 2025 saw a noticeable rise in bans and relocations of assemblies in Sofia as well as inconsistent facilitation and pre-emptive police pressure. While violent incidents at anti-EU demonstrations were handled proportionately, accountability for police inaction and misconduct remained weak, and online mobilisation faced unexplained platform takedowns affecting civic actors. Overall, the gap between the protective legal framework and uneven enforcement continues to narrow the space for peaceful public participation.

The right to peaceful assembly is constitutionally protected,<sup>53</sup> and mainly regulated by the Law on Assemblies, Rallies, and Demonstrations<sup>54</sup> which remains unchanged since 2019. In principle, individuals and groups—including minors, foreigners, and informal collectives—may organise or participate in assemblies without needing permission. The law only requires a notification regime, and spontaneous assemblies are recognised in practice. Two provisions of the law regulating peaceful assembly could be improved: the general ban on the participation of masked people in assemblies and the ban on assemblies during the hours between 22:00 and 8:00.<sup>55</sup> However, there are no reports of these provisions being strictly applied or used to restrict peaceful assemblies.

Banning protests is a rare occurrence; however, there is a notable increase in the number of banned protests or assemblies that have been ordered to relocate in the capital city of Sofia, the main site of protests in Bulgaria. Between one to two such orders were issued in the years 2020–2022, compared to six orders for banning assemblies and eight orders

<sup>48</sup> <https://new.bnr.bg/bugas/post/102097931/atanas-ilkov-migrantite-v-strandja-sa-pochinali-ot-preumora-i-izmrzavane>

<sup>49</sup> <https://www.segabg.com/hot/category-bulgaria/mvr-razsledva-aktivisti-za-neverni-signali-za-bedstvashti-migranti>

<sup>50</sup> Statement by Mission Wings, available here: <https://bnrnews.bg/starazagora/post/358988/fondacia-misia-krile-otgovori-na-vatreshnia-ministar-za-obvineniata-pred-britansko-izdanie>

<sup>51</sup> Article of Times available here: <https://www.thetimes.com/uk/politics/article/russia-and-left-wingers-trying-to-flood-europe-with-illegal-migrants-vhmwxccch>

<sup>52</sup> FRONTEX report available here: <https://prd.frontex.europa.eu/document/serious-incident-reports-cat-1/> ; additional information: <https://www.svobodnaevropa.bg/a/granichna-politsiya-nepalnoletni-migranti-smart-strandzha/33595923.html>

<sup>53</sup> See art. 43 of the Constitution of the Republic of Bulgaria, available here: <https://www.parliament.bg/bg/const>

<sup>54</sup> See Закон за събранията, митингите и манифестациите, adopted 2.02.1990 and lastly amended 2.07.2019, available here: <https://legislation.apis.bg/doc/10978/0>

<sup>55</sup> Those restrictions are not aligned with the international standard set by General Comment No. 37 on Article 21 (Right of peaceful assembly), available here: <https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-37-article-21-right-peaceful>



for relocated assemblies issued in 2025.<sup>56</sup> Most of the bans and relocation orders targeted protests in solidarity with the Palestinian people.

Additionally, 2025 saw some instances of inconsistencies in the facilitation of assemblies and instances of interference, particularly during politically sensitive protests. In March 2025, a spontaneous demonstration against Russia's aggression in Ukraine, triggered by the public appearance of the Russian Ambassador, led to attempts to intimidate the protesters after Revival Party supporters filed a complaint with the prosecution. The complaint was made against a participant in the demonstration who had booed the ambassador.<sup>57</sup>

In several cases, protest organisers reported pre-emptive pressure by the police and identification checks that appeared aimed at discouraging participation rather than ensuring order.<sup>58</sup> In October 2025, Bulgarian Union with One Goal (known as BOEC)<sup>59</sup> activists faced police pressure during daily protests titled "Garbage for the Garbage" in front of the headquarters of the DPS Party. Intimidation tactics included repeated document checks and attempts to disperse demonstrators, even though the protest was peaceful.<sup>60</sup> In September, Amnesty Bulgaria had to cancel a protest in support of Palestine, planned in front of Arena 8888, on the occasion of the first Euroleague basketball match between Hapoel Tel Aviv and Barcelona.<sup>61</sup> Police summoned Amnesty Bulgaria representatives to a meeting in a police station, where they were pressured to relocate the protest. After refusing to do so, the mayor of Sofia issued an order to relocate the protest to a location that diminished the original purpose and cause of the demonstration.<sup>62</sup>

There was a surge in anti-EU protests in 2025 organised by politicians due to the anticipated adoption of the Euro in 2026. In February 2025, during such a protest organised by the Revival Party, the building of the EU Parliament's representation in Sofia was vandalised and members of the police force were attacked. The authorities reacted adequately by arresting individuals implicated in the violence and allowing the peaceful participants to continue the protest. Following the incidents, criminal prosecution was initiated against the alleged violent participants,<sup>63</sup> which included both politicians from the party and its supporters. However, the prosecution of four MPs who were identified as participants in the violent acts has been postponed, as Parliament refused to strip them of their immunity.<sup>64</sup>

As of November 2025, the Sofia Municipality has received 451 notifications for public assemblies and issued six and eight orders to ban and relocate assemblies, respectively. Some of the orders contained motives incompatible with human rights standards, namely that the assembly would cause distress to some members of the public or the police would be unable to provide adequate policing as there would be other events in the

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<sup>56</sup> Information provided to BCNL after a FOIA request

<sup>57</sup> <https://www.bta.bg/bg/news/bulgaria/oficial-messages/849237-pp-vazrazhdane-vazrozhdentsi-sas-signal-do-prokuraturata-zaradi-mitrofanova>

<sup>58</sup> Reports about police intimidation during a protest against the Mol in October - <https://bnr.bg/horizont/post/102225936/masirano-policeisko-prisastvie-na-protesta-na-boec-pred-mvr>

<sup>59</sup> България Обединена с Една Цел | БОЕЦ - блог България Обединена с Една Цел | БОЕЦ – блог

<sup>60</sup> A video showcasing unprovoked police checks of alleged protestors here:

[https://www.facebook.com/watch/?ref=search&v=3587606724723820&external\\_log\\_id=58c102ea-0962-473a-932e-ae62d8fa06c2&q=%D0%BF%D0%BE%D0%BB%D0%B8%D1%86%D0%B8%D1%8F%20%D0%BF%D1%80%D0%BE%D0%B2%D0%B5%D1%80%D1%8F%D0%B2%D0%B0%20%D0%B1%D0%BE%D0%BA%D0%BB%D1%83%D0%BA](https://www.facebook.com/watch/?ref=search&v=3587606724723820&external_log_id=58c102ea-0962-473a-932e-ae62d8fa06c2&q=%D0%BF%D0%BE%D0%BB%D0%B8%D1%86%D0%B8%D1%8F%20%D0%BF%D1%80%D0%BE%D0%B2%D0%B5%D1%80%D1%8F%D0%B2%D0%B0%20%D0%B1%D0%BE%D0%BA%D0%BB%D1%83%D0%BA)

<sup>61</sup> Bulgaria has recognized the state of Palestine since 1988

<sup>62</sup> Statement by Amnesty Bulgaria - <https://www.amnesty.bg/solidarity-action-euroleague-sofia/>

<sup>63</sup> <https://url-shortener.me/6QG8>

<sup>64</sup> <https://www.mediapool.bg/nova-sedmitsa-nov-neuspeshen-opit-za-svalyane-imunitete-na-vazrazhdane-news372392.html>



city at the same time or unproven claims about possible violent acts during the assembly. Although the number of such orders is still not significant, it has increased notably since the current administration of Sofia was elected in 2023.<sup>65</sup> In comparison, the third biggest city Varna, although being a location of significantly fewer protests, has not issued a single order limiting the freedom of assembly since 2020.

There were no major incidents during LGBTQI+ assemblies in 2025 in Sofia. However, a member of the Sofia Municipal Council publicly called for a ban on Sofia Pride, claiming that the event is not only immoral but expensive for the municipality, thus not only inciting discrimination but also dismissing the state's obligation to protect assemblies.<sup>66</sup>

Online mobilisation remained generally unrestricted. However, several CSOs' Facebook pages faced temporary takedowns or reduced visibility, including the page of "Justice for Everyone" with over 140,000 followers, which serves as a platform for organising protests demanding judicial reforms.<sup>67</sup> The lack of transparency in such decisions, combined with state inaction to defend organising online, contributed to a weaker enabling environment.

Although the legal framework sets minimal obligations on protest organisers, notifications for roadblocks remain arbitrary in practice.<sup>68</sup> In some cases, the municipalities do not object to the protesters blocking roads and in others, organisers need to seek permission from the Public Road Administration.

Some municipalities require documentation beyond what the law requires, especially for assemblies that include physical installation of objects or street art. In several cases, police discouraged protest organisers, warning about potential "public disorder liability", even when no such risk existed.<sup>69</sup>

Following incidents of police brutality during lengthy anti-government protests in 2020,<sup>70</sup> the Interior Ministry updated instructions regarding police equipment during assemblies.<sup>71</sup> This obliged police to visibly wear a personal identification number when policing public assemblies. There were no reports in 2025 about breaches of this regulation. However, the regulation on the use of surveillance during protests remains overly general and non-transparent. According to the Ministry of Interior Act,<sup>72</sup> surveillance, for example recording or photographing, by law enforcement is allowed during public gatherings. However, there is no information for law enforcement on how to inform the public on the surveillance used – a legal obligation.

There is no effective mechanism guaranteeing accountability of law enforcement when policing public gatherings. In most cases of alleged police use of excessive force during public gatherings, there is no immediate information about the imposed sanctions on police personnel. Victims need to resort to civil claims for damages, which in many cases are lengthy and thus discourages individuals from taking legal action. In 2025, the ECtHR found Bulgaria in breach of the European Convention on Human Rights by failing to carry out an effective investigation into alleged police brutality and inhuman

<sup>65</sup> Data collected by FOIA requests and interviews

<sup>66</sup> <https://novini.bg/article/2025031002012984943>

<sup>67</sup> <https://pravosadie-zavseki.com/2025/09/20/svalyane-na-fejsbuk-stranitsata-na-initsiativa-pravosadie-za-vseki/>

<sup>68</sup> According to experts who took part in the MACS evaluation process

<sup>69</sup> According to responders in the research phase of the MACS reporting process

<sup>70</sup> <https://www.dw.com/en/bulgaria-riots-police-anti-government-protesters-clash-in-sofia/a-54798039>

<sup>71</sup> ИНСТРУКЦИЯ № 8121з-988 от 17.08.2015 г. за вида на личния знак, за условията и реда за ползването му и реда за носене на индивидуален идентификационен номер от служителите на Министерството на вътрешните работи

<sup>72</sup> Art. 91 ЗАКОН за Министерството на вътрешните работи



treatment following the arrest of a participant in the 2020 anti-governmental protests.<sup>73</sup> Additionally, in 2025, another victim participating in the same protest was awarded damages in a civil case; however, the court decision is still not final.<sup>74</sup>

Although Bulgaria's legal framework provides solid guarantees for the right to peaceful assembly, inconsistent enforcement, growing administrative restrictions in Sofia, and weak police accountability continue to erode trust in the authorities' ability to protect this right. Without structural reforms and predictable, rights-based policing, the space for peaceful public participation will remain vulnerable to restrictions.

### 3. Freedom of Expression

Despite constitutional guarantees, freedom of expression in Bulgaria continued to deteriorate in 2025, with no meaningful reforms to strengthen media independence. Bulgaria ranked again among the lowest EU countries in the Reporters Without Borders (RSF) World Press Freedom Index. Criminal defamation remains in force and vulnerable to Strategic Lawsuit Against Public Participation (SLAPP) misuse, while new restrictive legislative proposals – including broadened bans on content related to gender identity – further threaten open public debate. Structural safeguards remain weak: The EU Anti-SLAPP Directive has not been transposed; hate-speech protections are ineffective in practice; political pressure on journalists persists; and concerns about censorship, restrictions on access to information, and interference with public media intensified. At the same time, reforms to the Electronic Communications Act finally aligned Bulgaria with the EU Digital Services Act (DSA), but broader guarantees for media freedom and free expression remain fragile.

The Constitution<sup>75</sup> as well as other relevant acts, such as the Radio and Television Act, the Criminal Code and the Access to Information Act, guarantee freedom of expression and set limitations on it. However, in 2025, media freedom deteriorated, as once again, Bulgaria is amongst the lowest ranking EU countries in the RSF World Press Freedom Index, followed only by Greece and Cyprus.<sup>76</sup> In addition, there have been no significant reforms to improve the guarantees for protection of the right to freedom of expression. In addition, restrictive legislative proposals have been made; SLAPP cases remain unaddressed; and smear campaigns against journalists by politicians still occur.

In several cases before the ECtHR,<sup>77</sup> Bulgaria has been criticised for its legislation criminalising insult or slander<sup>78</sup> and in particular, for punishing insult and slander against public officials more severely and for imposing disproportionate punishments. In 2023, several reforms to the Criminal Code were initiated to amend the insult and slander crimes in accordance with the ECtHR case law. These included the removal of the more severe punishment for slander targeting public officials (in 2023) and decreasing

<sup>73</sup> <https://hudoc.echr.coe.int/?i=001-245860>

<sup>74</sup> <https://defakto.bg/2025/06/09/pavel-tsvetkov-bivsh-chlen-gerb-osadi-sdvr-za-nezakonen-arest-v-nosthta-na-protestite-ot-2-septemvri-2020-g/>

<sup>75</sup> Art. 39-41, <https://www.parliament.bg/bg/const>

<sup>76</sup> <https://rsf.org/en/index>

<sup>77</sup> See among others: MARINOVA AND OTHERS v. BULGARIA available here: <https://hudoc.echr.coe.int/eng?i=001-164668>; KARZHEV v. BULGARIA available here: <https://hudoc.echr.coe.int/eng?i=001-176816>; Kasabova v. Bulgaria available here: <https://hudoc.echr.coe.int/eng?i=001-104539> ;

<sup>78</sup> Art. 146 – 148 of the Criminal Code, available here: <https://lex.bg/laws/ldoc/1589654529>



the fines imposed for those crimes (in 2025). Despite the progress made, the criminalisation of insult and slander can be abused in SLAPPs.

Since 2023, crimes related to hate speech have been expanded to cover crimes based on sexual orientation.<sup>79</sup> In practice, however, there have been no convictions on this basis as of 2025,<sup>80</sup> despite potential cases identified by CSOs.<sup>81</sup> Meanwhile, legislative proposals were made in 2025<sup>82</sup> to build upon the 2024 ban on “propaganda, promotion, or incitement in any way, directly or indirectly, of ideas and views related to non-traditional sexual orientation and/or gender identity different from the biological one” in schools.<sup>83</sup> The new proposals envisaged a wider ban on access to and dissemination of information related to gender identity and expression that does not conform to the view of sex as strictly biological.<sup>84</sup> This triggered a warning from the Council of Europe’s (CoE) Commissioner for Human Rights that such legislative changes would “lead to disproportionate restrictions on the rights to education, freedom of expression and assembly, and the right to health without discrimination, including on grounds of gender identity.” The Commissioner also noted that such measures may reinforce stigma and prejudice against LGBTQI+ people.<sup>85</sup>

The EU Anti-SLAPP Directive has not yet been transposed. The Justice Ministry announced that it is working on amendments to the Civil Procedural Code but no draft law has been made public.<sup>86</sup> Additionally, the measures proposed by the EU Parliament in its Recommendation (EU) 2022/758 on protecting journalists and human rights defenders from unfounded or abusive court proceedings<sup>87</sup> have not been implemented. Therefore, there is still no data provided either by the state or by the courts on the number and legal nature of SLAPP cases.<sup>88</sup>

Currently, SLAPP cases are only monitored by CSOs, according to which there are 17 ongoing cases.<sup>89</sup> In 2025, notable SLAPP cases included big businesses suing journalists to politicians suing activists. For example, there is the ongoing 2023 infamous<sup>90</sup> insurance company Lev Ins’s civil defamation lawsuit for 500,000 EUR against the media outlet Mediapool. The case concerns quotes from a minister’s statements during an official meeting, which were then disseminated by the media outlet. In 2025, the company decided to appeal the second instance court’s decision to the third and final instance.<sup>91</sup> Another notable SLAPP case is the lawsuit filed by Mayor Branchevsky of a

<sup>79</sup> Art. 162 of the Criminal Code.

<sup>80</sup> According to interviewed experts and confirmed by a research of the case law.

<sup>81</sup> See report here: <https://shorturl.at/Du95z>

<sup>82</sup> <https://www.parliament.bg/bg/bills/ID/165835>

<sup>83</sup> See art. 11 of the Pre-School and School Education Act, available here: <https://lex.bg/bg/laws/ldoc/2136641509>

<sup>84</sup> <https://civicspacewatch.eu/bulgaria-attacks-on-fundamental-freedoms-and-civic-space-through-anti-lgbtq-legislation/>

<sup>85</sup> <https://www.coe.int/en/web/commissioner/-/commissioner-asks-bulgarian-lawmakers-to-reject-amendments-that-would-undermine-the-human-rights-of-lgbti-people-1>

<sup>86</sup> According to interviewed experts in 2025 the working group to the MoJ has restarted its work with a new composition including only one CSO.

<sup>87</sup> Available here: <https://eur-lex.europa.eu/EN/legal-content/summary/protection-of-journalists-and-human-rights-defenders-from-unfounded-or-abusive-court-proceedings.html#:~:text=WHAT%20IS%20THE%20AIM%20OF,the%20Treaty%20on%20European%20Union> .

<sup>88</sup> Confirmed by the answers provided by courts to access to information requests sent as part of the desk research for this Report.

<sup>89</sup> The data is provided by the working group on SLAPPs in Bulgaria part of the international coalition CASE. Information about the working group available here: <https://url-shortener.me/6QGN>

<sup>90</sup> Lev Ins was the “winner” of the 2024 European SLAPP Contest’s highly coveted Corporate Bully of the Year award of the international CASE coalition. <https://www.the-case.eu/gallery-of-shame/>

<sup>91</sup> <https://www.mediapool.bg/lev-ins-shte-sadi-mediapool-za-1-mln-lv-i-na-treta-instantsiya-news372683.html>



region of Sofia, who sued two activists for 25,000 EUR<sup>92</sup> for their social media posts that criticised his order to evict an entire Roma neighbourhood in the middle of the night.<sup>93</sup>

Instances of politicians pressuring or undermining the role of the media are also common. The Parliament, which was formed in late 2024, limited journalists' access to the Parliament building and in some cases, journalists had their accreditation revoked without justification.<sup>94</sup>

The state of the public broadcaster, Bulgarian National Television (BNT), which has been governed by a director with an expired mandate since 2022, is another cause for concern.<sup>95</sup> In October, BNT published an interview with the mayor of Sofia, a member of the current opposition. The mayor's criticism of Delyan Peevski, a political leader sanctioned under the Magnitsky Act, had been removed from the interview.<sup>96</sup> This case is an example of what experts claim is self-censorship being practised in the Bulgarian media sector.<sup>97</sup>

In October 2025, the smallest party in the ruling coalition – There is Such People – proposed amendments to the criminal code regarding the unauthorised dissemination of information about someone's private life through the press, mass media, electronic systems or any other means. The proposed amendments also defined “information about private life” as including data about personal relationships, family relations, intimate matters or health conditions.<sup>98</sup> Two days after the proposal was made, it was passed in the leading parliamentary committee without any prior public consultation. If adopted, the amendments would “open the doors for unprecedented censorship”<sup>99</sup> and potentially criminalise investigations into corruption. The proposal, however, was withdrawn a couple of days later following public backlash against it.<sup>100</sup>

Another highly contested legislative proposal in 2025 was the reform on accessing the public property registry. The Minister of Justice announced that such a change would prevent property frauds.<sup>101</sup> However, the initial idea to limit access to copies of notarial deeds only to persons who can prove legal interest was criticised as limiting access to information for journalistic investigations into corruption.<sup>102</sup> The Ministry of Justice amended its original proposal, with information such as the contractual parties and price to be made available to the public.<sup>103</sup> However, according to journalists, notarial deeds contain other useful information which could now be restricted.<sup>104</sup>

The *ad hoc* parliamentary committee mandated to investigate the “influence of George Soros, Alexander Soros and their foundations” was created in early November and explicitly targets media outlets. In the justification for the decision to create the

<sup>92</sup> More on the SLAPP case -

[https://romalo.bg/?p=746&fbclid=IwY2xjawOWON9leHRuA2FlbQIxMQBzcnRjBmFwcF9pZBAyMjllwMzcxNzg4MjAwODkyAAEene\\_Sj3Kwk-E9MkMuamce8IzhdtCOZXYBitQmnPgKTqMKomIwIx5k9XkQBua\\_aem\\_A5b\\_uUwovlvkxx67H6Vlsg](https://romalo.bg/?p=746&fbclid=IwY2xjawOWON9leHRuA2FlbQIxMQBzcnRjBmFwcF9pZBAyMjllwMzcxNzg4MjAwODkyAAEene_Sj3Kwk-E9MkMuamce8IzhdtCOZXYBitQmnPgKTqMKomIwIx5k9XkQBua_aem_A5b_uUwovlvkxx67H6Vlsg)

<sup>93</sup> More on the eviction: <https://www.amnesty.bg/zaharna-fabrika-chronology/>

<sup>94</sup> <https://www.svobodnaevropa.bg/a/informatsionni-bodigardove-do-peeovski-koy-ima-pravo-da-e-zhurnalst-v-parlamentna/33575537.html>

<sup>95</sup> <https://www.svobodnaevropa.bg/a/emil-koshlukov-bnt/33494068.html>

<sup>96</sup> <https://www.svobodnaevropa.bg/a/terziev-intervyu-bnt-sem/33550255.html>

<sup>97</sup> Self-censorship was pointed out as a serious freedom of expression issue by multiple experts in the course of the research conducted for this report

<sup>98</sup> Bill available here: <https://www.parliament.bg/bg/bills/ID/166655>

<sup>99</sup> <https://europeanjournalists.org/blog/2025/10/09/bulgaria-wants-to-criminalise-alleged-privacy-violations/>

<sup>100</sup> More information here: <https://shorturl.at/DB8Se>

<sup>101</sup> <https://mjs.bg/home/index/ce10cdc1-6aec-4d35-bb7b-182a37816715>

<sup>102</sup> More information here: <https://shorturl.at/RjMqW>

<sup>103</sup> <https://www.justice.government.bg/home/index/ce10cdc1-6aec-4d35-bb7b-182a37816715>

<sup>104</sup> Information from an interview with Atanas Chobanov, an investigatory journalist at Bird.bg



committee, an owner of several media outlets could be highlighted as a threat to the “interests of the Bulgarian citizens and the sovereignty of the country.”<sup>105</sup>

On 6 November 2025, the Bulgarian Parliament adopted amendments to the Electronic Communications Act (ECA),<sup>106</sup> confirming the designation of the Communications Regulation Commission (CRC) as the Digital Services Coordinator. It grants the CRC supervisory powers and the authority to certify out-of-court dispute settlement bodies and award trusted flagger or vetted researcher status, while also introducing comprehensive enforcement architecture.<sup>107</sup> The legislative reform implementing the EU Digital Services Act came after more than a year and a half delay and an official warning by the European Commission.<sup>108</sup>

## 4. Right to Participation in Decision-Making

Bulgaria has a formal legal framework that supports public participation in decision-making, including the Law on Normative Acts,<sup>109</sup> which requires public consultation for draft legislation of the government, and the Access to Public Information Act,<sup>110</sup> which provides citizens and CSOs with tools to obtain information needed to participate in policy discussions. In practice, however, participation remains inconsistent and often superficial, with weak early-stage inclusion of CSOs, irregular or ineffective consultative bodies, and no obligation for MPs to provide their legislative proposals for public consultation.

The updated Public Consultation Portal improved transparency and introduced new participatory tools, but authorities still provide uneven feedback and many consultations suffer from short deadlines or fast-tracked procedures. Throughout 2025, several high-profile cases—including rushed environmental and budget reforms—demonstrated systemic shortcomings that undermine meaningful civic involvement in policymaking.

Municipalities also have consultation rules embedded in local governance acts. However, in many cases, the existing public participation mechanisms do not function in practice or are carried out informally. A major issue remains the inconsistencies in the parliamentary legislative process and the absence of rules obliging legislative proposals by MPs to undergo public consultations.

In late 2025, an updated government Public Consultation Portal was launched.<sup>111</sup> The central government (and local governments if they choose to) publish legislative and other policy proposals for public consultations on the portal, according to a procedure set out in the Law on Normative Acts. The updated portal also provides a new participatory mechanism which allows citizens to make legislative proposals and to vote on each other's proposals.

<sup>105</sup> [https://www.parliament.bg/bg/ns\\_acts/ID/166709](https://www.parliament.bg/bg/ns_acts/ID/166709)

<sup>106</sup> Available here: <https://lex.bg/laws/ldoc/2135553187>

<sup>107</sup> <https://www.kinstellar.com/news-and-insights/detail/3893/bulgaria-completes-digital-services-act-implementation>

<sup>108</sup> Commission calls on Bulgaria to comply with the Digital Services Act, <https://digital-strategy.ec.europa.eu/en/news/commission-calls-bulgaria-comply-digital-services-act>

<sup>109</sup> <https://lex.bg/laws/ldoc/2127837184>

<sup>110</sup> <https://lex.bg/laws/ldoc/2134929408>

<sup>111</sup> <https://www.strategy.bg/>



The government promptly publishes its legislative and policy proposals on the portal, with 1,080 public consultations announced in 2025.<sup>112</sup> Data shows that approximately one-third of the consultations received input from the public; however, authorities are inconsistent in their feedback on the consultations.<sup>113</sup>

There are no rules on how the government chooses to invite or not invite CSOs to working groups on policy and legislative acts. This leads to inconsistent practices in the inclusion of civil society in the early stages of the decision-making process. In 2025, 197 working groups were created by the Council of Ministers, of which only 24 CSOs took part.<sup>114</sup>

The government also includes CSOs in policymaking and institutional dialogue processes by establishing consultative councils with, in some cases, limited decision-making powers. In 2025, there were 32 consultative councils<sup>115</sup> established by the Council of Ministers in accordance with the Law on Administration. CSOs participate in 14 of these working groups.<sup>116</sup> There are other councils established by other laws. However, in many cases, they do not function or function sporadically. For instance, the civil society members of the National Council for the Prevention of Domestic Violence<sup>117</sup> report that they had just one meeting in 2025, despite multiple calls for more active engagement.<sup>118</sup> The functioning of the Civil Society Development Council (CSDC) to the Council of Ministers<sup>119</sup> – a body which, according to the Non-for Profit Legal Persons Act, has a significant role in the drafting and implementing of the state's policies concerning the CSO sector, has faced delays. After the election of 14 new civil society members in April 2025, the CSDC had its first meeting in September.<sup>120</sup> Since then, it has been functioning regularly and has resumed its work on a new Strategy for the Support of Civil Society Development.<sup>121</sup> Similarly, the establishment of the civil society consultative council to the Parliamentary Commission for Direct Citizen Participation, Complaints, and Interaction with Civil Society was delayed, with the procedure finalised in late November<sup>122</sup> – more than a year after the election of the Parliament.

The National Council for Cooperation on Ethnic and Integration Issues, the Children's Rights Council, and other consultative bodies remained largely ineffective, meeting infrequently and lacking influence on policy outcomes. The resignation of the Public

<sup>112</sup> Data collected through access to public information requests. Public consultations publishes as follow (year-number of consultations): 2023 – 687; 2024 – 704; 01.01.2025 to 10.11.2025 – 1018; With proposals form the public filed on in 2022 – 277; 2023 – 303; 2024 – 295;

<sup>113</sup> <https://bcnl.org/chuva-li-vlastta-napravenite-predlozhe>

<sup>114</sup> Information provided after an access to information request.

<sup>115</sup> [https://itsda.government.bg/ras/executive\\_power/cm\\_councils](https://itsda.government.bg/ras/executive_power/cm_councils)

<sup>116</sup> Information provided after a access to information request.

<sup>117</sup> Established on the basis of art. 6a of the Domestic Violence Protection Act, available here: <https://lex.bg/laws/ldoc/2135501151>

<sup>118</sup> <https://www.bta.bg/bg/news/bulgaria/oficial-messages/1014881-fondatsiya-buditelkite-slaba-otsenka-za-institutsiite-v-borbata-s-nasilieto-n>

<sup>119</sup> The Civil Society Development Council is composed of 14 CSOs elected by other CSOs. It is established on the basis of art. 4 of the Non-for-Profit Legal Persons Acts according to which the Council: 1. gives opinions on all draft legislation, strategies, programs, and plans that relate to the activities of civil society organisations; 2. coordinates and monitors the implementation of the Strategy for Supporting the Development of Civil Society Organizations in the Republic of Bulgaria and the Action Plan for the Strategy; 3. proposes to the Council of Ministers an action plan, including a financial plan, for the implementation of the strategy under item 2 for each subsequent year and reviews and evaluates its implementation; 4. collects information on the financing of civil society organisations with public funds in order to determine the effectiveness of the funds allocated; 5. conducts an annual review of the needs and problems of civil society organisations, as well as their results and achievements; 6. supports the process of interaction between state and local authorities and civil society organisations; 7. determines priorities and adopts rules and procedures, as well as allocates funds for the promotion and financial support of projects of public importance to non-profit legal entities for the implementation of activities of public benefit.

<sup>120</sup> <https://www.gov.bg/special/bg/prestentat/novini/savetat-za-razvitie-na-grazhdanskoto-obshchestvo-initsiira-sazdavaneto-na-strategiya-za-podkrepa-na-razvitiето-na-grazhdanskite-organizatsii-v-balgaria>

<sup>121</sup> Information by BCNL which is a member of the CSDC

<sup>122</sup> Decision available here: <https://tinyurl.com/mfj8rdx4>



Council on the National Children’s Hospital in November 2025 is an example of frustration with the lack of meaningful engagement.<sup>123</sup>

In contrast to the legislative proposals of the Council of Ministers, the bills proposed by MPs are not subject to obligatory public consultations. Although civil society actors could take part in the decision-making process in the Parliament by sending legal opinions and participating in parliamentary committees’ meetings, in practice they are often prevented from effectively doing so due to short deadlines, fast-tracked procedures,<sup>124</sup> proposals of major amendments between two readings of bills or by transitional provisions.

An illustrative example of these faulty practices in 2025 was the abolition of the second instance appeal of the environmental impact assessments – a major tool for strategic litigation for ecological organisations.<sup>125</sup> The controversial amendment to the Environmental Protection Act was made during the procedure for amending the Public Property Act. It was made on the last day of the deadline for making proposals before the second reading of the Public Property Act amendment, which was adopted three days later, leaving no time for any meaningful consultations.<sup>126</sup>

The procedure for adopting the state budget for 2026 also exposed serious flaws that deeply undermined public participation. The main part of the budget was published by the Ministry of Finance for a day of public consultation, which was in violation of the Law on Normative Acts.<sup>127</sup> The National Tripartite Cooperation Council had not agreed upon it.<sup>128</sup> In the Parliament, the budget was also fast-tracked, and the meeting of the Budgetary Commission to vote on the second reading of important parts of the budget was rescheduled at the last minute, a couple of hours before the originally set time. The lack of meaningful dialogue and consultations on the budget, seen by many as controversial, led to a major protest in Sofia, following which the legislative procedure was stopped.<sup>129</sup>

In October 2024, the Bulgarian government started consultations<sup>130</sup> on its fifth National Plan within the Open Governance Partnership (OGP), following the process applied during the previous National Plan (2022–2024) which was praised for its inclusivity of civil society in the drafting process.<sup>131</sup> By the end of 2025, however, there was no follow up of the consultations and no signals that the new National Plan was being drafted.

Bulgaria has committed to regulating lobbying as part of its EU Recovery and Resilience Plan and the OECD, within the scope of its accession process. The initial draft law presented by the Ministry of Justice within the working group on the act,<sup>132</sup> in late 2024, was met with harsh criticism by civil society.<sup>133</sup> It envisaged disproportionate accountability obligations for CSOs and proposed to regulate indirect lobbying – public

<sup>123</sup> <https://nmd.bg/obsthestveniyat-savet-otteglya-doverieto-si-ot-proczesa-po-sazdavane-na-naczionalnata-detska-bolnicza/>

<sup>124</sup> In November a parliamentary committee voted important amendments related to the governance of the sanctioned Russian oil company Lukoil during an already infamous 28 second meeting.

[https://www.dnevnik.bg/bulgaria/2025/11/07/4849606\\_za\\_28\\_sekundi\\_i\\_taino\\_upravliavashtite\\_resiha/](https://www.dnevnik.bg/bulgaria/2025/11/07/4849606_za_28_sekundi_i_taino_upravliavashtite_resiha/)

<sup>125</sup> <https://forthenature.org/poreden-opit-za-premahvane-na-vtorata-instantsiya-za-obzhalvane-na-aktove-po-ekologichnoto-zakonodatelstvo--1-9476>

<sup>126</sup> This approach is in violation to art. 79 of the Rules of Procedure of the National Assembly, available here:

<https://www.parliament.bg/bg/podns>

<sup>127</sup> Consultation information available here: <https://www.minfin.bg/bg/legislation/7/572>

<sup>128</sup> The National Tripartite Cooperation Council is chaired by the Minister of Social Affairs and has members representatives of the trade and labour unions, information available here: [https://iisda.government.bg/ras/executive\\_power/council/220](https://iisda.government.bg/ras/executive_power/council/220)

<sup>129</sup> <https://www.mediapool.bg/upravlyavashtite-spirat-byudzhet-2026-po-narezhdane-na-borisov-obnovena-news377713.html>

<sup>130</sup> Information about the consultations available here: <https://strategy.bg/bg/ogp/news>

<sup>131</sup> <https://www.opengovpartnership.org/documents/bulgaria-results-report-2022-2024/>

<sup>132</sup> BCNL has received the draft as a member of the group.

<sup>133</sup> <https://bcnl.org/trainings/krivorazbrana-ideva-za-zakon-za-lobizma-zaplashva-grazhdanskite-svobodi>



statements or interviews calling on the public to influence decision makers. In March, the newly appointed Minister of Justice withdrew the controversial draft and committed to a dialogue with civil society and to address concerns.<sup>134</sup> However, by the end of 2025, no draft legislation had been presented for public consultation.

Access to information, which enables meaningful public participation, is regulated by the Access to Information Act.<sup>135</sup> It establishes an easy procedure for making an access to information request with no need to justify why the information is being requested. Inconsistencies in the implementation are often successfully challenged in court. A landmark decision in 2025 was reached against the Prosecutor-General, who falsely claimed that there are no obligations under the Access to Information Act and blocked access to information needed in investigations into corruption.<sup>136</sup>

In a separate case, a journalist was ordered to pay disproportionate court expenses after challenging a refusal to grant access to information on a rural municipality. Additionally, the mayor of the municipality immediately requested enforcement actions in accordance with the court decision, which resulted in the journalist's court expenses almost doubling.<sup>137</sup> This case was seen as a form of SLAPP, where a journalist faces sanctions for attempting to access information that should be made available upon request.

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<sup>134</sup> <https://www.justice.government.bg/home/index/645eea1d-dbac-4650-9f71-7dbba3ac7512>

<sup>135</sup> Available here: <https://lex.bg/laws/ldoc/2134929408>

<sup>136</sup> <https://www.segabg.com/hot/category-bulgaria/sudut-e-kategorichen-prepiskite-sreshtu-sarafov-ne-mozhe-da-sa-tayna>

<sup>137</sup> More information here: <https://tinyurl.com/9y32p9t2>



# Recommendations

- 1.** Stop the harassment and stigmatisation of CSOs that receive foreign funding by disbanding the committee on Soros-funded entities and rejecting current and future FARA-like proposals;
- 2.** Improve the accessibility of the CSO registration procedures – the Registry Agency needs to issue clear and user-friendly guidance tailored to the needs of both CSOs and the public officials administrating the registration procedures;
- 3.** Fully transpose and implement the EU Anti-SLAPP Directive by adopting measures covering both domestic cases and cases with an international component;
- 4.** Commit to civic engagement and state support for civil society by adopting and implementing the Civil Society Development Strategy aligned with the EU Civil Society Strategy;
- 5.** Ensure full accountability for police personnel accused of violating the rights of citizens during protests by carrying out transparent and timely investigations; and
- 6.** Commit to robust and transparent public mechanisms for funding CSOs instead of stigmatising foreign funding.



# Methodology

The Monitoring Action for Civic Space (MACS) methodology is designed to assess the state of civic space in EU countries with a focus on identifying both progress and deterioration in selected countries. The European Center for Not-for-Profit Law, European Civic Forum, Bulgarian Center for Not-for-Profit Law, Nyt Europa, Le Mouvement associatif, Hungarian Environmental Partnership Foundation, Netherlands Helsinki Committee, National Federation of Polish NGOs and the Civil Society Development Foundation joined forces to create MACS, using our collective expertise in the monitoring field. MACS consists of two complementary tools: the country reports and the Early Warning and Alert System.

The methodology monitors the following dimensions:

- Freedom of Association;
- Access to Funding;
- Freedom to Peaceful Assembly;
- Freedom of Expression;
- Participation in Decision-Making;
- Safe Space.

Each dimension is evaluated against a set of standards that capture the state's commitment under international and European human rights law. Each standard is assessed using qualitative indicators. For further details, download the [full methodology](#).

Throughout the reports, the red highlighted sections mark any developments that are directly falling or could potentially fall under the [sphere of competence of the European Union](#). This is to better understand where the EU has the legal authority to act, as opposed to developments that remain under Member State control.

2025 was the testing phase of the methodology by national partners. While some partners monitored all six dimensions, others focused on the three core civic space dimensions (association, peaceful assembly and expression) and selected one additional dimension aligned with national priorities.

## Country process

The drafting of this narrative report was preceded by a data collection phase including desk research and a review of:

- legal acts, including draft legislation and amendments;
- reports by state and non-state actors and articles;
- access to information requests (43)



- review of relevant case law both national and of the ECHR;
- an inquiry disseminated amongst relevant stakeholders and consequent interviews for additional questions.

The data collected is relevant for the period of January 2025 to December 2025.



Monitoring Action  
for Civic Space