

Civic space in the EU: Mapping of national approaches to civic space monitoring, participation and protection

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1. MONITORING AND REPORTING ON CIVIC SPACE

1.1. Monitoring initiative from the side of the State

Has there been any initiative from the side of the State (government/parliament) to observe/monitor the restrictions/challenges/threats for civic space actors in your country in the last three years?

In Bulgaria, over the past three years, there have been no targeted initiatives from the side of the State (government or parliament) to observe or monitor the restrictions, challenges and threats faced by civic space actors.

According to the Non-Profit Legal Entities Act (*Закон за юридическите лица с нестопанска цел*), one of the functions of the Civil Society Development Council (CSDC) (*Съвет за развитие на гражданското общество, СРГО*), which serves as a consultative and advisory body to the government, is to conduct an annual review of the needs and challenges faced by civil society organisations, as well as to assess their results and achievements.¹ However, to date, no such reviews have been published or conducted by the Council. In response to this and several other unmet obligations of the Council, civil society organisations have called for urgent action,² including advocating for amendments to the council's rules of procedure to ensure its continuity and effective functioning.³

1.2. Other monitoring initiatives

Has there been any other actor/body/mechanism that has observed/monitored civic space restrictions/challenges/threats in your country in the last three years?

Over the past three years, most national mechanisms for observing or monitoring challenges within Bulgaria's civic space have been developed and implemented by civil society organisations. While some of these mechanisms provide a broad overview of the civic space, others focus on specific challenges related to the protection of specific fundamental rights, examining the role of civil society organisations and the threats they face.

¹ Bulgaria, Non-Profit Legal Entities Act ([Закон за юридическите лица с нестопанска цел](#)), 6 October 2000 (last amended 18 December 2020), Article 4(4).

² Bulgarian Center for Non for Profit Law (*Български център за нестопанско право*) (2022), 'Civil Society Development Council (CSDC) - report and change of chairperson (['Съвет за развитие на гражданското общество \(СРГО\) – отчет и смяна на председател'](#))', press release, 8 March 2024.

³ Bulgaria, Civil Society Development Council (*Съвет за развитие на гражданското общество*) (2024), Activity Report 02.2022-02.2024 ([Доклад за дейността 02.2022-02.2024](#)), 8 March 2024, p. 9.

Examples of such initiatives include:

- Citizen Participation Index. The Citizen Participation Index is an initiative of the Citizen Participation Forum Association (CPF) (*Сдружение „Форум гражданско участие“*, ФГУ), a network of over 100 Bulgarian civil society organisations actively working to improve the environment and practices of citizen participation in decision-making at both national and local levels. The methodology for the index was developed in 2015 with the ambition to carry out the study every two years.⁴ Over the past three years, the Citizen Participation Forum Association (CPF) (*Сдружение „Форум гражданско участие“*, ФГУ) published two reports – one for 2021⁵ and one for 2023.⁶ These reports analyse the state of civic space in Bulgaria across three domains: environment of citizens’ participation, practices and manifestations of citizens’ participation, and effects of citizens’ participation (measuring whether and how citizens’ participation leads to changes). Through the years the initiative was supported by funding from the EEA Financial Mechanism 2009-2014, the Charles Stewart Mott Foundation, America for Bulgaria Foundation and the Civitates Fund of the Network of European Foundations.
- Civil Society Organization Sustainability Index. The Civil Society Organization Sustainability Index (CSOSI) assesses the strength and viability of the civil society organisation sector in 73 countries. The index is produced by FHI 360 in partnership with local partners and with the financial support of the U.S. Agency for International Development (USAID). The latest report on Bulgaria, published in 2022, covers the year 2021 and was released in partnership with the International Center for Not-for-Profit Law and the Bulgarian Center for Not-for-Profit Law (BCNL) (*Български център за нестопанско право, БЦНП*).⁷ The report evaluates the overall sustainability of civil society organisations in the country and examines key aspects

⁴ Citizen Participation Forum Association (*Сдружение „Форум гражданско участие“*) (2015), [Citizen Participation Index Methodology](#).

⁵ Taralezhkova, I., Petrov, G. and Stancheva, M. (2021), [Citizen Participation Index in Bulgaria 2021: Citizen engagement in times of crises](#), Sofia, Citizen Participation Forum Association (*Сдружение „Форум гражданско участие“*), November 2021.

⁶ Taralezhkova, I. and Petrov, G. (2023), [Citizen Participation Index in Bulgaria 2023: Inaudible voices or deaf institutions?](#), Sofia, Citizen Participation Forum Association (*Сдружение „Форум гражданско участие“*), June 2023.

⁷ United States Agency for International Development, Bureau for Democracy, Conflict and Humanitarian Assistance, Center for Excellence on Democracy, Human Rights and Governance (2022), [2021 Civil Society Organization Sustainability Index for Bulgaria](#), October 2022.

such as the legal environment, organisational capacity, advocacy efforts, service delivery, sector infrastructure, and public reputation.

- National representative survey on the public attitudes towards the activities of civil society organisations. The study, conducted in 2024, is the fourth in a series of national representative studies conducted by Alpha Research (*Алфа рисърч*) in collaboration with the Bulgarian Center for Not-for-Profit Law (BCNL) (*Български център за нестопанско право*, БЦНП). Its purpose is to gather data on the role of civil society organisations and non-governmental organisations, explore the challenges they face, understand public expectations, and assess their activities.⁸ The survey was funded by the America for Bulgaria Foundation (*Фондация „Америка за България“*).
- Dynamics of the Non-Governmental Sector in Bulgaria 2023. This report is the second large-scale study published by the Open Society Institute – Sofia (*Институт „Отворено общество – София“*). It covers various aspects of the work of non-governmental organisations in Bulgaria, including legal and socio-political environment, geographic scope, areas of activity, financial resources, and sharing of values.⁹ The study was carried out under the Bilateral Cooperation Fund of the Active Citizens Fund in Bulgaria Programme funded by the Financial Mechanism of the European Economic Area 2014–2021.
- Civic Participation and Civic Values among Children and Young People from Vulnerable School Communities. This research report is based on a survey conducted among students from schools with high share of children from vulnerable groups.¹⁰ It was carried by the Open Society Institute – Sofia (*Институт „Отворено общество – София“*) and Amalipe Center for Interethnic Dialogue and Tolerance (*Център за междуетнически диалог и толерантност „Амалипе“*) with financial support from the U.S. Embassy in Bulgaria. The report focuses on civic

⁸ Bulgarian Center for Not-for-Profit Law (*Български център за нестопанско право*) (2024), *Public attitudes towards the activities of civil society organisations: results of a nationally representative survey 2024* ([Обществени нагласи към дейността на гражданските организации: резултати от национално представително проучване 2024 г.](#)), Sofia, Alpha Research, Bulgarian Center for Not-for-Profit Law (*Български център за нестопанско право*), 3 October 2024.

⁹ Markova, E., Zahariev, B., Yordanov, I. and Stoychev, G. (2023), [*Dynamics of the non-governmental sector in Bulgaria 2023*](#), Sofia, Open Society Institute – Sofia (*Институт „Отворено общество – София“*), December 2023.

¹⁰ Zahariev, B. and Yordanov I. (2023), [*Civic participation and civic values among children and young people from vulnerable school communities*](#), Sofia, Open Society Institute – Sofia (*Институт „Отворено общество – София“*), December 2023.

participation and the civic values of children and young people from vulnerable communities.

- Notebook: assessment of the state for its care for children and families. The Notebook is an annual monitoring report of the National Network for Children (NNC) (*Национална мрежа за децата*, НМД) published since 2012, which evaluates policies related to children for the past year. The report includes a dedicated chapter on child participation, assessing the promotion of civic engagement among children and the extent to which their participation is implemented in Bulgaria.¹¹
- Annual human rights in Bulgaria report. The civil society organisation Bulgarian Helsinki Committee (BHC) (*Български хелзинкски комитет*, БХК) publishes annual reports on the state of human rights in Bulgaria. Each report includes a dedicated chapter on the freedom of association and peaceful assembly providing insights into the challenges and restrictions faced by civic space actors. Additionally, other chapters covering various fundamental rights contribute to monitoring the overall state of civil society, documenting key developments, legal changes, and human rights violations affecting civil society organisations and broader civic participation.¹²

¹¹ National Network for Children (*Национална мрежа за децата*) (2024), *Notebook 2024: what is the average success of the state in caring for children? (Бележник 2024: Какъв е средният успех на държавата в грижата за децата?)*, Sofia, National Network for Children (*Национална мрежа за децата*), April 2024.

¹² Kachaunova, A. et al. (2024), *Human Rights in Bulgaria in 2023 (Правата на човека в България през 2023 г.)*, Sofia, Bulgarian Helsinki Committee (*Български хелзинкски комитет*), 30 April 2024.

2. PARTICIPATION

2.1. Rules on participation

Are there any binding rules in place in your country for the participation/consultation of civil society organisations for developing/implementing/monitoring laws and policies?

Bulgaria currently lacks a comprehensive policy document specifically dedicated to the participation of civil society organisations in decision-making processes. The last such document was adopted in 2012 and was valid for the period 2012–2015.¹³

The Constitution of the Republic of Bulgaria (*Конституция на Република България*) establishes a foundational commitment to civic participation, proclaiming that the state shall create conditions for the free development of the individual and civil society.¹⁴ Additionally, the right of legislative initiative is vested in each Member of Parliament and in the government.¹⁵

The Statutory Instruments Act (*Закон за нормативните актове*) serves as the primary legal framework governing the preparation, adoption, and implementation of legislative and regulatory documents in Bulgaria. It includes provisions to ensure public participation in the legislative process, including the right of citizens and legal entities to make proposals for improving the legislation to the responsible institutions.¹⁶ Additionally, it mandates preliminary impact assessments and public consultations with citizens and legal entities during the process of drafting legal acts.¹⁷ Chapter 2 and Chapter 3 of this law regulate the involvement of citizens and legal entities in the legislative process, with the extent of participation varying depending on the initiating legislative body. Public consultations are required under both general and sector-specific legislation. The statutory deadline for proposals and comments on the drafts published for public consultation is not less than 30 days. In exceptional cases and expressly stating the reasons in the explanatory

¹³ Bulgaria, Council of Ministers (*Министерски съвет*), Strategy for Supporting the Development of Civil Society Organisations in Republic of Bulgaria 2012-2015 (*Стратегия за развитие на гражданските организации в Република България за периода 2012-2015*), 5 September 2012.

¹⁴ Bulgaria, Constitution of Republic of Bulgaria (*Конституция на Република България*), 13 July 1991, last amended 6 August 2024, Article 4(2).

¹⁵ Bulgaria, Constitution of Republic of Bulgaria (*Конституция на Република България*), 13 July 1991, last amended 6 August 2024, Article 87(1).

¹⁶ Bulgaria, Statutory Instruments Act (*Закон за нормативните актове*), 3 April 1973, last amended 3 May 2016, Article 18.

¹⁷ Bulgaria, Statutory Instruments Act (*Закон за нормативните актове*), 3 April 1973, last amended 3 May 2016, Article 18a.

memorandum or report, a different time limit may be set, but not shorter than 14 days.¹⁸ After the conclusion of the public consultation and before the adoption, respectively the issuance of the regulatory act, a summary of the proposals received together with a justification for the proposals not accepted must be published on the website of the relevant institution.¹⁹ In practice, this process applies primarily to bills proposed by the government. For MPs' bills, however, the procedure is less transparent. Once a draft law is submitted, it is not published until it is assigned to a parliamentary committee for discussion. Once allocated to a committee, citizens' organisations can submit their opinions within the given timeframe. However, when their input is disregarded, justification is not always provided.

In practice, the implementation of rules on public participation varies significantly depending on whether legislation is initiated by Members of Parliament or by the government.

Legal acts drafted by the government or another central executive authority must be published on the public consultation portal (*портал за обществени консултации*).²⁰ After their publication, different stakeholders, including civil society organisations, can submit their comments and proposals. Legal acts drafted by local authorities are published on the website of the respective municipality.²¹

The rules governing public participation in the legislative process within the parliament are outlined in the Rules of Organisation and Operation of the National Assembly (*Правилник за организацията и дейността на Народното събрание*).²² Over the past three years, seven successive parliaments have been elected in Bulgaria, each adopting its own organisational rules. While these rules have minor variations, they largely remain consistent with their predecessors. The rules stipulate that all draft laws, along with their explanatory reports and preliminary impact assessments, must be promptly entered in the public

¹⁸ Bulgaria, Statutory Instruments Act ([Закон за нормативните актове](#)), 3 April 1973, last amended 3 May 2016, Article 26(4).

¹⁹ Bulgaria, Statutory Instruments Act ([Закон за нормативните актове](#)), 3 April 1973, last amended 3 May 2016, Article 26(5).

²⁰ Bulgaria, Statutory Instruments Act ([Закон за нормативните актове](#)), 3 April 1973, last amended 3 May 2016, Article 26(3) and § 1 of the additional provisions. For more information, see the public consultation portal [Strategy.bg](#).

²¹ Bulgaria, Statutory Instruments Act ([Закон за нормативните актове](#)), 3 April 1973 (last amended 3 May 2016), Art. 26.

²² Bulgaria, Rules of Organisation and Operation of the National Assembly ([Правилник за организацията и дейността на Народното събрание](#)), 20 December 2024.

register of draft laws.²³ The rules also mandate the establishment of a standing parliamentary committee on direct citizen participation, complaints, and interactions with civil society.²⁴ Additionally, they provide for the creation of a public council comprising representatives of civil society organisations and tasked with advising the standing committee on direct citizen participation, complaints, and interactions with civil society. The standing committee must adopt the rules governing the council's composition, formation, and interaction with civil society. The rules must be published in the committee's webpage within the official website of the parliament.²⁵ Public councils comprising civil society representatives can also be established by the other standing parliamentary committees to serve as their advisory bodies.²⁶

In practice, the last public council was formed during the 47th National Assembly (2017–2021). Since then, six subsequent parliaments have not utilised this mechanism failing to establish a public council for any of their standing committees, including the committee on direct citizen participation, complaints, and interaction with civil society.²⁷

The Administration Act (*Закон за администрацията*) outlines the principles guiding administrative operations and requires public authorities to consult with social partners, private sector representatives, and civil society as part of the decision-making process.²⁸ The law also regulates how the government, ministries, and government agencies can establish consultative bodies, including ones involving civil society organisations. The government can form councils as permanent advisory bodies to coordinate executive branch activities and collaborate with other government entities, local authorities, and non-governmental organisations. Some sector-specific legislation also provides for the establishment of such councils with the government.²⁹ These councils are expected to

²³ Bulgaria, Rules of Organisation and Operation of the National Assembly ([Правилник за организацията и дейността на Народното събрание](#)), 20 December 2024, Article 70(1). For more information, see the register of draft laws on the [website](#) of the parliament.

²⁴ Bulgaria, Rules of Organisation and Operation of the National Assembly ([Правилник за организацията и дейността на Народното събрание](#)), 20 December 2024, Article 16(2).

²⁵ Bulgaria, Rules of Organisation and Operation of the National Assembly ([Правилник за организацията и дейността на Народното събрание](#)), 20 December 2024, Article 22(3).

²⁶ Bulgaria, Rules of Organisation and Operation of the National Assembly ([Правилник за организацията и дейността на Народното събрание](#)), 20 December 2024, Article 21(7).

²⁷ For more information, see the archive section on the [website](#) of the parliament.

²⁸ Bulgaria, Administration Act ([Закон за администрацията](#)), 5 November 1998, last amended 12 April 2024, Article 2(7).

²⁹ For example, see Bulgaria, Domestic Violence Protection Act ([Закон аз защита от домашното насилие](#)), 29 March 2025, last amended 11 August 2023.

contribute to the development and implementation of national policies on significant public matters.

One such example is the Civil Society Development Council (CSDC) (*Съвет за развитие на гражданското общество*, СРГО) established under the Non-Profit Legal Entities Act (*Закон за юридическите лица с нестопанска цел*) with the purpose of developing and implementing policies to support the civil society. The council includes representatives of non-profit legal entities carrying out public-benefit activities and has the authority to provide opinions on legislation and policy measures.³⁰ However, according to some stakeholders, the council's rules of organisation and operation hinder its effectiveness by failing to define clear rules on the regularity of its meetings and operations. This lack of clarity disrupts the council's ability to function efficiently, causing delays in fulfilling its responsibilities. As a result, civil society organisations have called for amendments to the rules. A similar issue exists with other councils under the government, such as the Council for Prevention of and Protection against Domestic Violence (CPPDV) (*Съвет за превенция и защита от домашното насилие*, СПЗДН), which held only two meetings throughout 2024.³¹

The Administrative Procedural Code (*Административно-процесуален кодекс*) also reinforces public participation in the decision-making process by granting citizens and their organisations the right to challenge secondary legislation after its adoption. However, the right to challenge such legal acts is limited to individuals and organisations whose rights, freedoms or legitimate interests have been or may be affected by the act or for whom it creates new obligations.³²

Over the past two years, the Ministry of Justice (MoJ) (*Министерство на правосъдието*, МП) has been working on developing a legal framework for regulating lobbying.³³ A working group, which includes representatives from non-governmental organisations, has been

³⁰ Bulgaria, Non-Profit Legal Entities Act (*Закон за юридическите лица с нестопанска цел*), 6 October 2000 (last amended 18 December 2020), Article 4(3).

³¹ Bulgaria, Council of Ministers (*Министерски съвет*), Minutes of meetings of the Civil Society Development Council (*Протоколи от заседания на Съвета за развитие на гражданското общество*), received by formal request for information.

³² Bulgaria, Administrative Procedural Code (*Административно-процесуален кодекс*), 12 July 2006, last amended 8 December 2023, Article 186.

³³ Bulgaria, Ministry of Justice (*Министерство на правосъдието*) (2023), 'MoJ has published for public consultation a concept for regulation of lobbying' (*МП публикува за обществено обсъждане Концепция за регулиране на лобизма*), press release, 17 November 2023.

tasked with drafting the legislation.³⁴ However, the draft law remains unpublished and is still in progress. Some participating organisations have raised significant concerns about the legislative process. First, they worry that certain provisions in the proposed legislation may resemble aspects of the registration of foreign agents laws.³⁵ Second, during the drafting of the concept for the law, civil society organisations reported that despite their active participation in the working group and agreement on specific texts, some sections published for public consultation were altered without their prior consent.³⁶

This is not the first instance where the Ministry of Justice (MoJ) (*Министерство на правосъдието*, МП) has faced criticism from civil society organisations regarding a lack of transparency and limited civil society participation in drafting legislation. For example, in December 2024, the Bulgarian Judges Association (BJA) (*Съюз на съдиите в България*, ССБ), a professional association of judges in Bulgaria, challenged the ministry's refusal to provide information about the formation and activities of a working group tasked with drafting amendments to the Judiciary Act (*Закон за съдебната власт*). According to the organisation, after learning about the working group's formation through social media posts, it formally requested to participate in the drafting process. However, the Ministry of Justice (MoJ) (*Министерство на правосъдието*, МП) did not respond to the request. Social media posts suggested that representatives from the non-governmental sector, including organisations that have contributed to the European Union's Rule of Law report, have also been excluded from the group. Subsequently, the Bulgarian Judges Association (BJA) (*Съюз на съдиите в България*, ССБ) filed a request for access to public information about the working group's composition and activities. The Ministry of Justice (MoJ) (*Министерство на правосъдието*, МП) refused to disclose the requested information, prompting the applicants to challenge this decision in court. The case, which is still pending, has been initiated with the help of lawyers from the Access to Information Programme (AIP) (*Програма „Достъп до информация“*, ПДИ), a civil society organisation dedicated to advocating for the right of access to information.³⁷

³⁴ Bulgaria, Ministry of Justice (*Министерство на правосъдието*) (2024), 'Work on the law on lobbying started' (['Стартира работата по закона за лобизма'](#)), press release, 28 November 2024.

³⁵ Fileva, L. (2024), 'Nadia Shabani, Center for Not-for-Profit Law: Lobbying draft silences civil society organisations' (['Надя Шабани, център за нестопанско право: Проектът за лобизма заглушава гражданските организации'](#)), *Dnevnik.bg*, 16 December 2024.

³⁶ Center for the Study of Democracy (*Център за изследване на демокрацията*) (2024), ['Regulation of lobbying activities in the Republic of Bulgaria: draft concept'](#), press release, 13 February 2024.

³⁷ Dachkova, D. (2024), 'The judges association is suing the Ministry of Justice' (['Съюзът на съдиите съди министерството на правосъдието'](#)), *Sega.bg*, 27 January 2025.

2.2.Consultative/participatory bodies

Are there any consultative/participatory bodies in your country that ensure the participation of civil society in developing/implementing/monitoring laws and policies?

On 16 February 2022, after several years of delays, the government officially established the Civil Society Development Council (CSDC) (*Съвет за развитие на гражданското общество*, СРГО). The council functions as a consultative body to the government, with the primary goal of supporting the development and implementation of policies to strengthen civil society. The council held its first meeting on 8 March 2022 and convened a total of nineteen times until February 2025. The council's responsibilities include, among others, providing opinions on draft laws and policy documents related to civil society, monitoring the implementation of the civil society strategy and the action plan for its implementation, and assessing the needs of the civil society. However, at present, there is no effective civil society strategy, as the last such document expired in 2015, and no subsequent strategies have been adopted.³⁸ Meanwhile, civil society organisations participating in the council have raised concerns about its effectiveness, citing irregular meetings and operational challenges. In response, ongoing discussions are taking place to amend to council's organisational rules, with a focus on establishing clear provisions for the regularity of its meetings and ensuring more consistent operations.³⁹

Apart from the Civil Society Development Council (CSDC) (*Съвет за развитие на гражданското общество*, СРГО), there are other consultative bodies that aim to facilitate civil society the participation in the development, implementation, and monitoring of laws and policies in specific policy areas.

Examples of such consultative bodies include:

- National Council for Cooperation on Ethnic and Integration Issues (NCCEII) (*Национален съвет за сътрудничество по етническите и интеграционните въпроси*, НССЕИВ). This council serves as a coordinating and advisory body to the government, supporting the development and implementation of the state policy on ethnic and integration matters. Its purpose is to facilitate cooperation, coordination, and public consultations between public authorities and civil society

³⁸ Bulgaria, Council of Ministers (*Министерски съвет*), Strategy for Supporting the Development of Civil Society Organisations in Republic of Bulgaria 2012-2015 ([*Стратегия за развитие на гражданските организации в Република България за периода 2012-2015*](#)), 5 September 2012.

³⁹ Bulgaria, Civil Society Development Council (*Съвет за развитие на гражданското общество*) (2024), Activity Report 02.2022-02.2024 ([*Доклад за дейността 02.2022-02.2024*](#)), 8 March 2024.

organisations, including organisations representing ethnic minorities and organisations working on inter-ethnic relations and human rights. Executive bodies are required to consult the council when drafting relevant legal acts or preparing, implementing, analysing, and reporting on relevant strategies and programmes.⁴⁰

- National Council for Integration of People with Disabilities (NCIPD) (*Национален съвет за интеграция на хората с увреждания, НСИХУ*). This council is a consultative body with the government composed of representatives of public authorities and civil society organisations. Its main function is to serve as a platform for cooperation in developing and implementing policies for persons with disabilities.⁴¹
- National Council on Social Inclusion (NCSI) (*Национален съвет по въпросите на социалното включване, НСВСВ*). This council is a body for coordination, cooperation and consultation in the development, implementation, monitoring and evaluation of the state policy in the field of social inclusion. The council includes, among others, representatives of civil society organisations with experience in the field of social inclusion policies at the national level.⁴²
- Council for Prevention of and Protection against Domestic Violence (CPPDV) (*Съвет за превенция и защита от домашното насилие, СПЗДД*). This council is responsible for shaping state policy on domestic violence and providing opinions on relevant laws and policy documents. The council includes a quota of four civil society organisations; however, similar to other consultative bodies, this quota is insufficient to constitute a majority.⁴³ In 2024 and 2025, a coalition of NGOs highlighted irregularities in the functioning of the council, which limited the participation of civil society organisations despite the designated quota for such organisations. In 2025, only two organisations applied to join the council, prompting criticism from other civil society organisations, which argued that the application period was unreasonably short, lasting only five days, including a weekend. Additionally, they highlighted that the announcement was not published on the

⁴⁰ Bulgaria, Council of Ministers (*Министерски съвет*), Rules on the structure and operation of the National Council for Cooperation on Ethnic and Integration Issues with the Council of Ministers ([Правилник за устройството и дейността на Националния съвет за сътрудничество по етническите и интеграционните въпроси към Министерския съвет](#)), 15 April 2011, last amended 15 December 2023. For more information about past and ongoing activities of the council, see the council's [website](#).

⁴¹ For more information about past and ongoing activities of the council, see the council's [website](#).

⁴² For more information about past and ongoing activities of the council, see the council's [website](#).

⁴³ For more information about past and ongoing activities of the council, see the council's [website](#).

official webpage of the council but instead appeared in the news section of the government's website, further restricting proper visibility and accessibility.⁴⁴

In October 2024, the government announced the launch of preparations for Bulgaria's fifth national action plan under the international Open Government Partnership (OGP) initiative. The time schedule for developing the plan was published for public consultation on 2 October 2024 and outlines a six-month process, with the final plan scheduled for adoption by the government in March 2025. For the development of the action plan, a transitional coordinating mechanism has been established, consisting of representatives from public administrations and civil society organisations. This mechanism, serving as a temporary version of the permanent coordinating mechanism to be established after the plan's adoption, is expected to play an active role in discussing received proposals and shaping the structure and content of the future plan.⁴⁵

2.3. Awareness raising and capacity building on participation

Does your Member State fund or carry out meaningful awareness raising and/or capacity building to support participation in your country?

In Bulgaria, the state does not fund or carry out meaningful awareness-raising and/or capacity-building to support participation.

The official website of the Civil Society Development Council (CSDC) (*Съвет за развитие на гражданското общество*, CPГО), originally intended to serve as a platform for publishing key information and outputs related to its work, has been non-functional for over two years.⁴⁶ While the council maintains a Facebook page,⁴⁷ the absence of a functional website hampers accessibility for civil society organisations and the general public. According to the council's organisational rules, its website should provide critical information, including a list of council members, details about its work, meeting schedules and summaries of discussions, and annual reports. This content is essential for fostering

⁴⁴ Wake-Up Foundation (*Фондация Будителките*) (2025), 'On the election of NGO members to the National Council for Prevention of and Protection against Domestic Violence' (*'Относно избора на НПО членове в Националния съвет за превенция и борба с домашното насилие'*), press release, 27 January 2025.

⁴⁵ Bulgaria, Council of Ministers (*Министерски съвет*) (2024), 'Preparation of the Fifth National Action Plan of the Republic of Bulgaria under the global Open Government Initiative begins' (*'Започва подготовката на Петия национален план за действие на Република България в рамките на глобалната инициатива „Партньорство за открито управление“'*), press release, 2 October 2024.

⁴⁶ For more information, check the council's non-functional official [website](#).

⁴⁷ For more information, see the councils' [Facebook page](#).

awareness and transparency regarding Bulgaria's policies on civil society participation.⁴⁸ At present, in the absence of an operational website, accessing this information is only possible through formal access-to-information requests to the government.⁴⁹

The lack of financial and material resources, insufficient state support for the civil society sector, and a shortage of professionals with the necessary expertise are the three most frequently cited challenges faced by active non-governmental organisations in Bulgaria.⁵⁰ Many non-governmental organisations, particularly those working in the field of human rights, rely almost exclusively to foreign donors to sustain their operations. This dependence on external funding has been leveraged by certain political parties to advocate for the adoption of a law on the registration of foreign agents, which would impose additional restrictions on civil society organisations, further limiting their activities and undermining broader civic space.⁵¹

According to the Non-Profit Legal Entities Act (*Закон за юридическите лица с нестопанска цел*), the government can support and encourage non-profit legal entities engaged in public benefit activities through tax and other financial and economic incentives, as well as financing in compliance with the rules on state aid.⁵² However, to date, the government has not established a dedicated financial mechanism to support civil society organisations,⁵³ despite discussions on the concept for such a mechanism during meetings

⁴⁸ Bulgaria, Council of Ministers (*Министерски съвет*), Rules on the organisation and operation of the Civil Society Development Council ([Правилник за организацията и дейността на Съвета за развитие на гражданското общество](#)), 10 September 2019, last amended 22 December 2023.

⁴⁹ Bulgaria, Council of Ministers (*Министерски съвет*), Minutes of meetings of the Civil Society Development Council (*Протоколи от заседания на Съвета за развитие на гражданското общество*), received by formal request for information.

⁵⁰ Markova, E., Zahariev, B., Yordanov, I. and Stoychev, G. (2023), [Dynamics of the non-governmental sector in Bulgaria 2023](#), Sofia, Open Society Institute – Sofia (*Институт „Отворено общество – София“*), December 2023, p.6.

⁵¹ For the most recent draft law on registration of foreign agents, see Bulgaria, National Assembly (*Народно събрание*) (2024), Draft Registration of Foreign Agents Act ([Законопроект за регистрация на чуждестранните агенти](#)), 11 November 2024.

⁵² Bulgaria, Non-Profit Legal Entities Act (*Закон за юридическите лица с нестопанска цел*), 6 October 2000, last amended 18 December 2020, Article 4(1).

⁵³ Teach for Bulgaria (*Заедно в час*) (2024), 'The development of civil society does not need declared good will, but real action' (['Развитието на гражданското общество не се нуждае от заявена добра воля, а от реални действия'](#)), press release, 8 March 2024.

of the Civil Society Development Council (CSDC) (*Съвет за развитие на гражданското общество*, СРГО).⁵⁴

Civil society organisations have also raised concerns about additional financial burdens imposed by public authorities managing EU-funded programmes.⁵⁵ For more than a decade, public authorities have classified funding received by civil society organisations under EU programmes as state aid, often without conducting the necessary analysis to differentiate between commercial and non-commercial activities.⁵⁶ As a result, civil society organisations are frequently and automatically treated as engaging in commercial activities leading to the application of *de minimis* restrictions. This classification limits the total amount of EU funds an organisation can receive through national intermediaries to less than €200,000 within any rolling three-year period.⁵⁷

⁵⁴ Bulgaria, Council of Ministers (*Министерски съвет*), Minutes of meetings of the Civil Society Development Council (*Протоколи от заседания на Съвета за развитие на гражданското общество*), received by formal request for information.

⁵⁵ Ngo.bg (2023), 'By misapplying the de minimis rule, Bulgaria limits the access of civil society organisations to EU funding' (['С неправилното прилагане на правилото де минимис България ограничава достъпа на гражданските организации до финансиране от ЕС'](#)), 25 July 2023.

⁵⁶ Shabani, N., Aleksieva, P. and Velichkova, R. (2014), *De minimis: analysis of the regulation and practices for the application of the state aid and de minimis rules in Bulgaria and in other EU Member States* ([De minimis. Анализ на регламентацията и практиките за прилагане на правилата за държавни помощи и за минимални помощи в България и в други страни-членки на ЕС](#)), Sofia, Bulgarian Center for Not-for-Profit Law (*Български център за нестопанско право*), September 2014.

⁵⁷ European Commission (2024), [2024 Rule of Law Report: Country Chapter on the rule of law situation in Bulgaria](#), SWD (2024) 802 final, Brussels, 24 July 2024, p. 36.

3. ENABLING ENVIRONMENT AND PROTECTION

3.1. Civil society strategy

Does your country have a general civil society strategy / civil society development strategy in place?

Currently, Bulgaria has no general civil society strategy in place outlining the participation of civil society organisations in decision-making processes. The last such strategy was adopted in 2012 and expired in 2025.⁵⁸

While steps have been initiated towards the development of a new strategy, significant challenges persist in advancing this agenda, with delays and coordination issues noted within the government administration. On 29 May 2023, the Civil Society Development Council (CSDC) (*Съвет за развитие на гражданското общество*, СРГО) established several working groups, one of which is tasked with developing a new strategy for the development of civil society organisations. The initial deadline for developing the strategy was set for 31 December 2023. On 19 December 2023, during a meeting of the council, representatives of civil society organisations reported that the progress of the working group was limited. Specifically, they noted that only three meetings had been held to date, and while a draft roadmap with proposed timelines had been drafted, the actual development of the strategy had yet to commence. During this meeting, the council decided that the development of the strategy should start after the finalisation of the roadmap in order to reflect the needs of all civil society organisations regardless of their geographical location and scope of work.⁵⁹

During a meeting of the council held in May 2024, it was reported that the working group tasked with the development of the strategy had not held any meetings convened since January 2024, despite the need for substantial groundwork to prepare the roadmap and draft a strategy that adequately reflects the diverse needs of civil society organisations across geographical locations and activity sectors. According to the civil society

⁵⁸ Bulgaria, Council of Ministers (*Министерски съвет*) (2012), Strategy for supporting the development of civil society organisations in the Republic of Bulgaria for the period of 2012-2015 ([*Стратегия за подкрепа на развитието на гражданските организации в Република България за периода 2012-2015*](#)), 5 September 2012.

⁵⁹ Bulgaria, Council of Ministers (*Министерски съвет*), Minutes of meetings of the Civil Society Development Council (*Протоколи от заседания на Съвета за развитие на гражданското общество*), received by formal request for information.

organisations participating in the council, this six-month gap has significantly delayed progress.⁶⁰

In its activity report covering the period from February 2022 to February 2024, the Civil Society Development Council (CSDC) (*Съвет за развитие на гражданското общество*, ЦРГО), noted that it had reached preliminary agreement on the roadmap for coordination with the government administration, and that the strategy was expected to be developed by June 2024.⁶¹

As of January 2025, no new information on the progress of the roadmap or the strategy has been made publicly available. The last documented meeting of the council dating back to May 2024 provides no significant updates on this issue.⁶²

3.2. Protecting an enabling environment

Is there a dedicated policy/framework (or support measures) in place in your country to enhance and protect an enabling environment for civil society to work on fundamental rights?

In Bulgaria, there is no dedicated policy or framework to enhance and protect an enabling environment for civil society to work on fundamental rights. On the contrary, some actions that took place over the past three years are seen as increasing the risk of restricting the ability of civil society to work on fundamental rights.

For example, a draft law on the registration of foreign agents was submitted to several consecutive parliaments despite strong opposition from civil society organisations.⁶³ The controversial amendments to the Pre-School and School Education Act (*Закон за предучилищното и училищното образование*), which prohibited the “propaganda” for

⁶⁰ Bulgaria, Council of Ministers (*Министерски съвет*), Minutes of meetings of the Civil Society Development Council (*Протоколи от заседания на Съвета за развитие на гражданското общество*), received by formal request for information.

⁶¹ Bulgaria, Civil Society Development Council (*Съвет за развитие на гражданското общество*) (2024), Activity Report 02.2022-02.2024 ([Доклад за дейността 02.2022-02.2024](#)), 8 March 2024.

⁶² Bulgaria, Council of Ministers (*Министерски съвет*), Minutes of meetings of the Civil Society Development Council (*Протоколи от заседания на Съвета за развитие на гражданското общество*), received by formal request for information.

⁶³ For the most recent draft law on registration of foreign agents, see Bulgaria, National Assembly (*Народно събрание*) (2024), Draft Registration of Foreign Agents Act ([Законопроект за регистрация на чуждестранните агенти](#)), 11 November 2024.

“non-traditional sexual orientations” in schools⁶⁴ and became known as the “don’t say gay” law, were accompanied by negative rhetoric targeted against civil society organisations, especially organisations working in the field of LGBTIQ+ rights.⁶⁵ These measures were compounded by smear campaigns targeting civil society organisations,^{66,67} including publication of “blacklists” on social media.⁶⁸ One such “blacklist” included the names of teachers and educators who had signed petitions against the amendments and were later labelled as “parasites” by the leader of the political party that proposed the adoption of the law.⁶⁹

On 11 December 2024, the Commission for Personal Data Protection (CPDP) (*Комисия за защита на личните данни, КЗЛД*) issued a decision finding the political party Revival (*Възраждане*) guilty of unlawfully disclosing personal data of members of governing bodies of civil society organisations. In August 2022, the political party Revival (*Възраждане*) published a list on its website containing the names and personal identification numbers of around 800 representatives of civil society organisations, labelling them as “foreign agents”. Following a complaint by 22 affected individuals, the Commission for Personal Data Protection (CPDP) (*Комисия за защита на личните данни, КЗЛД*) investigated the case and confirmed a violation of data protection laws. However, instead of imposing a fine, the commission issued instructions for the party to align its data processing practices with the General Data Protection Regulation (GDPR). The commission ruled that publishing names alone was legal and proportionate, but the disclosure of personal identification numbers was unlawful and had no legal basis. The party removed the data from its website in January

⁶⁴ Bulgaria, Pre-School and School Education Act ([Закон за училищното и предучилищното образование](#)), 1 August 2016, last amended 16 August 2024.

⁶⁵ Bulgaria, National Assembly (*Народно събрание*) (2024), Verbatim record No 3 of joint meeting of the Committee on Youth and Sport and the Committee on Demographic Policy, Children and Family held on 14 August 2024 ([Стенографски протокол № 3 от съвместно заседание на Комисията по въпросите на младежта и спорта и Комисията по демографската политика, децата и семейството, проведено на 14 август 2024 г.](#)), 14 August 2024.

⁶⁶ For more information, see the [Instagram page](#) of the civil society organisation Single Step.

⁶⁷ For more information, see the [Facebook page](#) of the civil society organisation Bilitis Foundation.

⁶⁸ Baruh, E. (2024), ‘The blacklist of teachers: Revival divides Bulgaria’ ([‘Черният списък’ с учителите: „Възраждане“ разделя България](#)), *Deutsche Welle*, 23 August 2024.

⁶⁹ Tsvetkova, S. (2024), ‘The Blacklist: Revival releases names of teachers against LGBTI law’ ([‘Черният списък’: „Възраждане“ пусна имена на учители против ЛГБТИ закона](#)), *Nova TV*, 22 August 2024.

2023, which the commission considered an act of good faith, thereby avoiding further sanctions.⁷⁰

At the beginning of 2025, new challenges to the enabling environment for civil society organisations emerged. On 30 January 2025, a group of Members of Parliament proposed the establishment of an ad hoc parliamentary committee to investigate the activities of George Soros in Bulgaria.⁷¹ The rationale behind this initiative, outlined in a brief document accompanying the proposal, is that through donations to civil society organisations, Soros has allegedly built a network of influence, with individuals connected to these organisations reportedly infiltrating public institutions, educational establishments, and the judiciary. The proposal was rejected in plenary session on 5 February 2025,⁷² but submitted again two days later.⁷³

⁷⁰ Dachkova, D. (2024), 'Revival pardoned after massive misuse of personal data' (['„Възраждане“ са помилвани след мащабна злоупотреба с лични данни](#)'), *Sega.bg*, 16 December 2024.

⁷¹ Bulgaria, National Assembly (*Народно събрание*), Draft decision on the establishment of a temporary committee to establish facts and circumstances regarding the activities of George Soros and Alexander Soros and their foundations on the territory of the Republic of Bulgaria, financing Bulgarian natural and legal persons and non-governmental organisations, as well as to establish their connection with political parties, magistrates, educational institutions, media, business structures and public authorities ([Проект на решение за създаване на Временна комисия за установяване на факти и обстоятелства относно дейността на Джордж Сорос и Александър Сорос и техните фондации на територията на Република България, финансиращи български физически и юридически лица и неправителствени организации, както и установяване на свързаността им с политически партии, магистрати, образователни институции, медии, бизнес структури и органи на държавна власт](#)), 30 January 2025.

⁷² Antova, D. (2024), 'The parliament rejected the draft decision on the establishment of a temporary committee to establish facts and circumstances regarding the activities of George and Alexander Soros in the country' (['Парламентът отхвърли проекторешението за създаване на временна комисия за установяване на факти и обстоятелства относно дейността на Джордж и Александър Сорос у нас](#)'), *Bulgarian News Agency* (Българска телеграфна агенция), 5 February 2025.

⁷³ Bulgaria, National Assembly (*Народно събрание*), Draft decision on the establishment of a temporary committee to establish facts and circumstances regarding the activities of George Soros and Alexander Soros and their foundations on the territory of the Republic of Bulgaria, financing Bulgarian natural and legal persons and non-governmental organisations, as well as to establish their connection with political parties, magistrates, educational institutions, media, business structures and public authorities ([Проект на решение за създаване на Временна комисия за установяване на факти и обстоятелства относно дейността на Джордж Сорос и Александър Сорос и техните фондации на територията на Република България](#)), 30 January 2025.

3.3. Law on recognition and protection of defenders

Is there a dedicated law (and/or guidelines) in your country dealing specifically with the recognition and/or protection of human rights defenders?

In Bulgaria, there is neither a dedicated law nor guidelines dealing specifically with the recognition and/or protection of human rights defenders. The term “human rights defenders” is not referred to in any Bulgarian legal or policy document.

3.4. Support and funding for protection of defenders

Is there any dedicated support/funding by the State for the protection of (individual) human rights defenders in your country?

In Bulgaria, there is no dedicated support or funding by the State for the protection of individual human rights defenders.

финансиращи български физически и юридически лица и неправителствени организации, както и установяване на свързаността им с политически партии, магистрати, образователни институции, медиуми, бизнес структури и органи на държавна власт), 7 February 2025.

4. PROMISING PRACTICE (OPTIONAL)

Please highlight one specific practice that you consider a promising practice on civic space in your country in the area of civic space - including monitoring, participation, enabling environment, and protection.

A notable initiative in the promotion and protection of civic space in Bulgaria is the coalition of civil society organisations Together against Violence (*Заедно срещу насилието*).⁷⁴ This informal coalition consists of approximately 40 civil society organisations primarily dedicated to human rights protection.

The coalition was initiated by the Wake-Up Foundation (*Фондация Будителките*)⁷⁵ as an advocacy group on issues related to protection against gender-based and domestic violence. The coalition's concerted efforts, including its role in facilitating the coordination between member organisations, played a key role in the adoption of amendments to the Domestic Violence Protection Act (*Закон за защита от домашното насилие*) and the measures for their implementation.⁷⁶

Over time, the coalition expanded its scope beyond combatting gender-based violence to address broader fundamental rights issues. In 2024, a particularly challenging year for civil society in Bulgaria, the coalition was actively involved in countering restrictive human rights measures, including opposing the amendments to the Preschool and School Education Act (*Закон за предучилищното и училищното образование*) prohibiting “propaganda” for “non-traditional sexual orientation” in schools,⁷⁷ and the series of draft laws on the registration of foreign agents.⁷⁸

To coordinate its activities effectively, the coalition maintains regular communication through closed groups on social networks. These channels serve as tools for information-sharing, monitoring risks, and organising joint advocacy efforts to protect civic space and fundamental rights in Bulgaria.

⁷⁴ Wake-Up Foundation, ‘You are not alone – together against violence. Our history’ (*‘Не си сама – Заедно срещу насилието. Нашата история’*), press release, March 2018.

⁷⁵ For more information about the foundation’s activities, see the official [website](#) of the organisation.

⁷⁶ Bulgaria, Domestic Violence Protection Act (*Закон за защита от домашното насилие*), 29 March 2025, last amended 11 August 2023.

⁷⁷ Bulgaria, Pre-School and School Education Act (*Закон за училищното и предучилищното образование*), 1 August 2016, last amended 16 August 2024.

⁷⁸ For the most recent draft law on registration of foreign agents, see Bulgaria, National Assembly (*Народно събрание*) (2024), Draft Registration of Foreign Agents Act (*Законопроект за регистрация на чуждестранните агенти*), 11 November 2024.