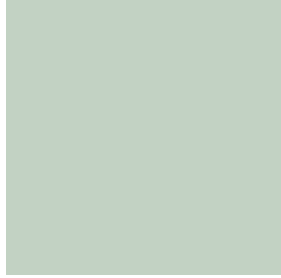


UPDATE ON 2025



BULGARIA



# COUNTRY REPORT

MAY 2026

## Acknowledgements & Methodology

This report was written by Iliana Savova, Director, Refugee and Migrant Legal Programme, Bulgarian Helsinki Committee and was edited by ECRE.

This report draws on information provided by monthly immigration and asylum statistical analyses published by the national authorities, regular information sharing utilised by the National Coordination Mechanism in the area of asylum and international protection, established since 2013 and chaired by the State Agency for Refugees (SAR), as well as monthly border, detention and refugee status determination (RSD) monitoring implemented by the refugee assisting non-governmental organisations.

The 2025 update to the AIDA country report on Bulgaria was shared with the State Agency for Refugees to provide an opportunity for comments. Any feedback received was reviewed by the author and, where appropriate, incorporated into the final version of the report.

The information in this report is up-to-date as of 31 December 2025, unless otherwise stated.

## The Asylum Information Database (AIDA)

The Asylum Information Database (AIDA) is managed by the European Council on Refugees and Exiles (ECRE). It aims to provide up-to date information which is accessible to researchers, advocates, legal practitioners and the general public through the dedicated website [www.asylumineurope.org](http://www.asylumineurope.org). It covers 27 countries, including 21 EU Member States (AT, BE, BG, CY, CZ, DE, ES, FR, GR, HR, HU, IE, IT, MT, NL, PL, PT, RO, SE, SI, SK) and 6 non-EU countries (Egypt, Serbia, Switzerland, Türkiye, Ukraine and the United Kingdom). The database also seeks to promote the implementation and transposition of EU asylum legislation reflecting the highest possible standards of protection in line with international refugee and human rights law and based on best practice.



This report is part of the Asylum Information Database (AIDA), funded by the European Union's Asylum, Migration and Integration Fund (AMIF) and ECRE. The contents of this report are the sole responsibility of ECRE and can in no way be taken to reflect the views of the European Commission.



# Table of Contents

Glossary & List of Abbreviations.....	6
Statistics.....	8
Overview of the legal framework.....	14
Overview of the main changes since the previous report update.....	16
Asylum Procedure.....	28
<b>A. General</b> .....	<b>28</b>
1. Flow chart.....	28
2. Types of procedures.....	29
3. List of the authorities intervening in each stage of the procedure.....	29
4. Determining authority.....	29
5. Short overview of the asylum procedure.....	31
<b>B. Access to the procedure and registration</b> .....	<b>33</b>
1. Access to the territory and push backs.....	33
2. Preliminary checks of third country nationals upon arrival.....	38
3. Registration of the asylum application.....	38
<b>C. Procedures</b> .....	<b>40</b>
1. Regular procedure.....	40
2. Dublin.....	50
3. Admissibility procedure.....	60
4. Border procedure (border and transit zones).....	62
5. Accelerated procedure.....	62
6. National protection statuses and return procedure.....	64
<b>D. Guarantees for vulnerable groups</b> .....	<b>66</b>
1. Identification.....	66
2. Special procedural guarantees.....	70
3. Use of medical reports.....	71
4. Legal representation of unaccompanied children.....	72
<b>E. Subsequent applications</b> .....	<b>74</b>
<b>F. The safe country concepts</b> .....	<b>76</b>
1. Safe country of origin.....	76
2. Safe third country.....	77
3. First country of asylum.....	79
<b>G. Information for asylum seekers and access to NGOs and UNHCR</b> .....	<b>79</b>
1. Provision of information on the procedure.....	79
2. Access to NGOs and UNHCR.....	81
<b>H. Differential treatment of specific nationalities in the procedure</b> .....	<b>82</b>
1. Afghanistan.....	83
2. Türkiye.....	84
3. Iraq.....	85

4. Syria .....	85
5. Other nationalities .....	86
<b>Reception Conditions.....</b>	<b>87</b>
<b>A. Access and forms of reception conditions.....</b>	<b>89</b>
1. Criteria and restrictions to access reception conditions .....	89
2. Forms and levels of material reception conditions.....	91
3. Reduction or withdrawal of reception conditions .....	91
4. Freedom of movement .....	92
<b>B. Housing .....</b>	<b>93</b>
1. Types of accommodation .....	93
2. Conditions in reception facilities .....	95
<b>C. Employment and education.....</b>	<b>98</b>
1. Access to the labour market .....	98
2. Access to education .....	99
<b>D. Health care .....</b>	<b>99</b>
<b>E. Special reception needs of vulnerable persons .....</b>	<b>101</b>
1. Reception of unaccompanied children .....	102
2. Reception of victims of violence .....	103
<b>F. Information for asylum seekers and access to reception centres.....</b>	<b>103</b>
1. Provision of information on reception.....	103
2. Access to reception centres by third parties.....	104
<b>G. Differential treatment of specific nationalities in reception .....</b>	<b>105</b>
<b>Detention of Asylum Seekers .....</b>	<b>106</b>
<b>A. General .....</b>	<b>106</b>
<b>B. Legal framework for detention .....</b>	<b>108</b>
1. Grounds for detention.....	108
2. Alternatives to detention.....	111
3. Detention of vulnerable applicants.....	111
4. Duration of detention .....	114
<b>C. Detention conditions.....</b>	<b>115</b>
1. Place of detention .....	115
2. Conditions in detention facilities .....	117
3. Access to detention facilities.....	120
<b>D. Procedural safeguards .....</b>	<b>121</b>
1. Judicial review of the detention order.....	121
2. Legal assistance for review of detention .....	121
<b>E. Differential treatment of specific nationalities in detention .....</b>	<b>122</b>
<b>Content of International Protection .....</b>	<b>123</b>
<b>A. Status and residence .....</b>	<b>125</b>
1. Residence permit .....	125
2. Civil registration .....	125

3. Long-term residence .....	127
4. Naturalisation .....	127
5. Cessation and review of protection status .....	128
6. Withdrawal of protection status .....	131
<b>B. Family reunification .....</b>	<b>132</b>
1. Criteria and conditions .....	132
2. Status and rights of family members .....	133
<b>C. Movement and mobility .....</b>	<b>134</b>
1. Freedom of movement .....	134
2. Travel documents .....	134
<b>D. Housing .....</b>	<b>135</b>
<b>E. Employment and education .....</b>	<b>135</b>
1. Access to the labour market .....	135
2. Access to education .....	136
<b>F. Social welfare .....</b>	<b>136</b>
<b>G. Health care .....</b>	<b>137</b>
<b>ANNEX I - Transposition of the CEAS in national legislation .....</b>	<b>138</b>
<b>Annex II – EU Pact on Migration and Asylum .....</b>	<b>140</b>

## Glossary & List of Abbreviations

<b>Closed reception centre</b>	Detention centre for asylum seekers managed by the SAR
<b>Humanitarian status</b>	Subsidiary protection under the recast Qualification Directive
<b>Zero integration</b>	Period during which all beneficiaries of international protection have been left without any integration support in Bulgaria
<b>ACET</b>	Assistance Centre for Torture Survivors
<b>AMIF</b>	Asylum, Migration and Integration Fund
<b>ASA</b>	Agency for Social Assistance   Агенция за социално подпомагане
<b>BHC</b>	Bulgarian Helsinki Committee
<b>CERD</b>	Committee on Elimination of Racial Discrimination
<b>CoM</b>	Council of Ministers   Министерски съвет
<b>CRF</b>	Closed reception facilities
<b>CPT</b>	European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment
<b>EASO</b>	European Asylum Support Office
<b>EC</b>	European Commission
<b>ЕСГРАОН</b>	Civil national database
<b>ЕГН</b>	Unique identification number   Единен граждански номер
<b>ЛНЧ</b>	Unique identification number for short-term or long-term residents, including asylum seekers   Личен номер на чужденец
<b>EUAA</b>	European Union Agency for Asylum
<b>Eurodac</b>	European fingerprint database
<b>Frontex</b>	European Border and Coast Guard Agency
<b>LAR</b>	Law on Asylum and Refugees
<b>LARB</b>	Law on Aliens in the Republic of Bulgaria   Закон за чужденците в Република България
<b>MOI</b>	Ministry of Interior
<b>NLAB</b>	National Legal Aid Bureau
<b>NPIR</b>	National Programme for the Integration of Refugees
<b>RRC</b>	Registration-and-reception centre
<b>RSD</b>	Refugee status determination
<b>SGBV</b>	Sexual and Gender based Violence
<b>SOP</b>	Standard Operating Procedures
<b>SANS</b>	State Agency for National Security   Държавна агенция "Национална сигурност"
<b>SAR</b>	State Agency for Refugees   Държавната агенция за бежанците
<b>SIS</b>	Schengen Information System

**TCN**

Third country national

**UNICEF**

United Nations Children's Fund

**UNHCR**

United Nations High Commissioner for Refugees

## Statistics

### Overview of statistical practice

The State Agency for Refugees (SAR) publishes monthly statistical reports on asylum applicants and main nationalities, as well as overall first instance decisions.<sup>1</sup> Further information is shared with non-governmental organisations in the context of the National Coordination Mechanism. The Ministry of Interior also publishes monthly reports on the migration situation, which include figures on apprehension, capacity, and occupancy of reception centres.<sup>2</sup>

### Applications and granting of protection status at first instance: 2025

	Applicants in 2025 (1)	Pending at end of 2025	Total decisions in 2025 (2)	Total substantive decisions (3)	Refugee status	Subsidiary protection	Humanitarian protection (4)	Rejection (5)
<b>Total</b>	3,895	1,632	7,090	4,662	62	897		3,703
Breakdown by countries of origin of the total numbers								
Azerbaijan	3	0	3	1	0	0	0	1
Albania	1	0	1	1	0	0	0	1
Algeria	60	4	64	57	0	2	0	55
Armenia	12	0	3	2	0	0	0	2
Afghanistan	943	494	1,461	327	1	12	0	314
Bangladesh	4	0	12	10	0	0	0	10
Stateless	36	4	51	42	6	10	0	26
Belarus	2	0	5	5	1	0	0	4
Burkina Faso	2	0	2	2	0	0	0	2
United Kingdom	1	0	0	0	0	0	0	
Venezuela	2	0	1	1	0	0	0	1
Vietnam	5	0	2	1	0	1	0	
Gambia	1	0	2	2	0	0	0	2
Ghana	1	0	1	1	0	0	0	1
Guinea	2	0	0	0	0	0	0	

<sup>1</sup> SAR, Statistics and reports, available at: <https://bit.ly/2ur0Y1a>.

<sup>2</sup> Ministry of Interior, Migration statistics, available at: <https://bit.ly/48C57wC>.

Georgia	1	0	3	2	0	0	0	2
Dominican Republic	3	0	3	3	0	0	0	3
DR Congo (Zaire)	6	0	8	6	0	0	0	6
Zimbabwe	0	0	1	0	0	0	0	0
Egypt	102	13	208	31	0	0	0	31
Ecuador	1	0	1	1	0	0	0	1
Israel	7	0	6	6	0	0	0	6
India	1	0	1	1	0	0	0	1
Iraq	545	84	547	412	1	6	0	405
Iran	99	91	74	40	0	2	0	38
Jordan	7	0	9	5	0	0	0	5
Kazakhstan	1	0	0	0	0	0	0	0
Cameroon	10	0	9	8	0	0	0	8
Kenya	1	0	1	1	0	0	0	1
Kyrgyzstan	1	0	1	0	0	0	0	0
Colombia	1	0	1	1	0	0	0	1
Congo	4	0	3	3	0	0	0	3
Côte D'Ivoire	3	0	2	2	0	0	0	2
Cuba	1	0	2	2	0	0	0	2
Libya	1	0	3	1	0	0	0	1
Lebanon	7	0	16	16	0	8	0	8
Mali	3	0	1	1	0	0	0	1
Morocco	967	65	986	937	0	1	0	936
Moldova	1	0	1	1	0	0	0	1
Nepal	2	0	1	1	0	0	0	1
Nigeria	7	0	3	3	0	0	0	3
Pakistan	94	35	96	82	4	0	0	78
Russian Federation	16	0	51	48	5	0	0	43
USA	1	0	1	1	0	0	0	1
Senegal	2	0	2	1	0	0	0	1
Sierra Leone	1	0	0	0	0	0	0	0
Syria	823	622	3,327	2,497	42	851	0	1,604
Somalia	2	0	3	1	0	0	0	1

Sudan	3	0	7	6	2	1	0	3
Tajikistan	1	0	0	0	0	0	0	0
Tanzania	0	0	1	1	0	0	0	1
Tunisia	20	0	22	18	0	0	0	18
Turkmenistan	1	0	1	1	0	1	0	0
Turkey	65	18	70	62	0	0	0	62
Uganda	1	0	1	1	0	0	0	1
Uzbekistan	4	0	3	1	0	0	0	1
Haiti	3	0	5	5	0	2	0	3
Sri Lanka	1	0	0	0	0	0	0	0
Japan	0	0	1	1	0	0	0	1

Source: State Agency for Refugees.

(1) “Applicants in year” refers to the total number of applicants, not only to first-time applicants.

(2) Statistics on decisions cover the decisions taken throughout the year, regardless of whether they concern applications lodged that year or in previous years.

(3) The total 7,090 decisions issued include 4,662 substantive decisions (status granting, status refusals, inadmissibility and manifestly unfounded decisions) and 2,428 decisions terminating asylum procedures due to absconding.

(4) The national law does not provide for any other form of additional protection except the humanitarian statuses, which is based on article 15 QD, i.e. it is a term used to transpose this article of the Qualification Directive into national law.

(5) “Rejection” only covers negative decisions on the merit of the application, regardless of whether issued in accelerated or regular procedure.

#### Applications and granting of protection status at first instance: 2025

Total	Substantive rejection rate		Substantive protection rate		Refugee rate		Subsidiary protection rate	
	Number	Percentage	Number	Percentage	Number	Percentage	Number	Percentage
	3,703	80%	959	20%	62	1%	897	19%
Breakdown by countries of origin of the total numbers								
Afghanistan	314	96%	13	4%	1	0.3%	12	3.7%
Albania	1	100%	0	0%	0	0%	0	0%
Algeria	55	96%	2	3,51%	0	0%	2	3.5%

Armenia	2	100%	0	0%	0	0%	0	0%
Azerbaijan	1	100%	0	0%	0	0%	0	0%
Bangladesh	10	100%	0	0%	0	0%	0	0%
Belarus	4	80%	1	20%	1	20%	0	0%
Burkina Faso	2	100%	0	0%	0	0%	0	0%
Cameroon	8	100%	0	0%	0	0%	0	0%
Colombia	1	100%	0	0%	0	0%	0	0%
Congo	3	100%	0	0%	0	0%	0	0%
Côte D'Ivoire	2	100%	0	0%	0	0%	0	0%
Cuba	2	100%	0	0%	0	0%	0	0%
Dominican Republic	3	100%	0	0%	0	0%	0	0%
DR Congo (Zaire)	6	100%	0	0%	0	0%	0	0%
Ecuador	1	100%	0	0%	0	0%	0	0%
Egypt	31	100%	0	0%	0	0%	0	0%
Gambia	2	100%	0	0%	0	0%	0	0%
Georgia	2	100%	0	0%	0	0%	0	0%
Ghana	1	100%	0	0%	0	0%	0	0%
Haiti	3	60%	2	40%	0	0%	2	40%
India	1	100%	0	0%	0	0%	0	0%
Iran	38	95%	2	5%	0	0%	2	5%
Iraq	405	98.3%	7	1.7%	1	0.2%	6	1.5%
Israel	6	100%	0	0%	0	0%	0	0%
Japan	1	100%	0	0%	0	0%	0	0%
Jordan	5	100%	0	0%	0	0%	0	0%
Kenya	1	100%	0	0%	0	0%	0	0%
Lebanon	8	50%	8	50%	0	0%	8	50%
Libya	1	100%	0	0%	0	0%	0	0%
Mali	1	100%	0	0%	0	0%	0	0%
Moldova	1	100%	0	0%	0	0%	0	0%

Morocco	936	99.9%	1	0,1%	0	0%	1	0,1%
Nepal	1	100%	0	0%	0	0%	0	0%
Nigeria	3	100%	0	0%	0	0%	0	0%
Pakistan	78	95.1%	4	4.9%	4	4.9%	0	0%
Russian Federation	43	89.6%	5	10.4%	5	10%	0	0%
Senegal	1	100%	0	0%	0	0%	0	0%
Somalia	1	100%	0	0%	0	0%	0	0%
Stateless	26	61.9%	16	38.1%	6	14%	10	23.8%
Sudan	3	50%	3	50%	2	33%	1	16.7%
Syria	1,604	64.2%	893	35.8%	42	1.7%	851	34%
Tanzania	1	100%	0	0%	0	0%	0	0%
Tunisia	18	100%	0	0%	0	0%	0	0%
Türkiye	62	100%	0	0%	0	0%	0	0%
Turkmenistan	0	0%	1	100%	0	0%	1	100%
Venezuela	1	100%	0	0%	0	0%	0	0%
Vietnam	0	0%	1	100%	0	0%	1	100%
Uganda	1	100%	0	0%	0	0%	0	0%
USA	1	100%	0	0%	0	0%	0	0%
Uzbekistan	1	100%	0	0%	0	0%	0	0%

Source: State Agency for Refugees. Calculations made by the author based on official data on asylum decisions.

Note: These rates are calculated based on substantive decisions only (including inadmissibility), excluding terminations of procedure due to absconding.

#### Gender/age breakdown of the total number of applicants: 2025

	Men	Women
<b>Number</b>	3,350	545
<b>Percentage</b>	86%	14%

Source: State Agency for Refugees.

	Adults	Children	
		Accompanied	Unaccompanied
<b>Number</b>	2,870	573	452
<b>Percentage</b>	100%	56%	44%

### First instance and appeal decision rates: 2025

It should be noted that, during the same year, the first instance and appeal authorities handle different caseloads. Thus, the decisions below do not concern the same applicants.

	First instance		Appeal	
	Number	Percentage	Number	Percentage
<b>Total number of decisions</b>	4,662	100%	2,206	100%
Positive decisions	959	21%	0	0%
• <i>Refugee status</i>	62	1%	-	-
• <i>Subsidiary protection</i>	897	19%	0	0%
Negative decisions	3,773	79%	2,206	100%

Source: State Agency for Refugees.

### Court revocation rates: 2025

	First court instance (regional adm. court)		Final instance (Supreme adm. court)	
	Number	Percentage	Number	Percentage
<b>Total court decisions</b>	2,352	100%	1,376	100%
Revoked negative	254	11%	112*	8%
Sustained refusals	2,098	89%	1,264	92%

Source: State Agency for Refugees.

\* The Supreme administrative court issued 13 decisions, which revoked the ones of the lower courts due to procedural violations and reverted cases back to them for a retrial.

## Overview of the legal framework

### Main legislative acts relevant to asylum procedures, reception conditions, detention and content of protection

Title in English	Original Title (BG)	Abbreviation	Web Link
Law on Asylum and Refugees	Закон за убежището и бежанците	LAR	<a href="https://lex.bg/laws/ldoc/2135453184">https://lex.bg/laws/ldoc/2135453184</a> (BG)
Law on Aliens in the Republic of Bulgaria	Закон за чужденците в Република България	LARB	<a href="https://bit.ly/2Z7e4ee">https://bit.ly/2Z7e4ee</a> (BG)

### Main implementing decrees and administrative guidelines and regulations relevant to asylum procedures, reception conditions, detention and content of protection

Title in English	Original Title (BG)	Abbreviation	Web Link
Regulations on the implementation of the Law on Aliens in the Republic of Bulgaria <i>Amended by: CoM № 129 of 5 July 2018</i>	Правилник за приложение на Закона за чужденците в Република България (ППЗЧРБ)	LARB Regulations	<a href="https://bit.ly/3Tdqtfr">https://bit.ly/3Tdqtfr</a> (BG)
Ordinance № 332 of 28 December 2008 for the responsibilities and coordination among the state agencies, implementing Council Regulation (EC) No 343/2003 establishing the criteria and mechanisms for determining the Member State responsible for examining an asylum application lodged in one of the Member States by a third-country national, Commission Regulation (EC) No 1560/2003 of 2 September 2003 laying down detailed rules for the application of Council Regulation (EC) No 343/2003, Council Regulation No 2725/2000 concerning the establishment of 'Eurodac' for the comparison of fingerprints for the effective application of the Dublin Convention and Council Regulation (EC) No	Наредба приета с ПМС №332 от 28.12.2008 за отговорността и координацията на държавните органи, осъществяващи действия по прилагането на Регламент (ЕО) № 343/2003 на Съвета от 18 февруари 2003 г. за установяване на критерии и механизми за определяне на държава членка, компетентна за разглеждането на молба за убежище, която е подадена в една от държавите членки от гражданин на трета страна, Регламент (ЕО) № 1560/2003 на Комисията от 2 септември 2003г. за определяне условията за прилагане на Регламент (ЕО) № 343/2003 на Съвета за установяване на критерии и механизми за определяне на държавата членка, която е компетентна за разглеждането на молба за убежище, която е подадена в една от държавите членки от гражданин на трета страна,	ORD 332/08	<a href="http://bit.ly/1U1Cl5">http://bit.ly/1U1Cl5</a> (BG)

407/2002 of 28 February 2002 laying down certain rules to implement Regulation (EC) No 2725/2000	Регламент (ЕО) № 2725/2000 на Съвета от 11 декември 2000г. за създаване на система "ЕВРОДАК" за сравняване на дактилоскопични отпечатьци с оглед ефективното прилагане на Дъблинската конвенция и Регламент (ЕО) № 407/2002 на Съвета от 28 февруари 2002 г. за определяне на някои условия за прилагането на Регламент (ЕО) № 2725/2000 относно създаването на системата "ЕВРОДАК" за сравняване на дактилоскопични отпечатьци с оглед ефективното прилагане на Дъблинската конвенция		
Ordinance № I-13 of 29 January 2004 on the rules for administrative detention of aliens and the functioning of the premises for aliens' temporary accommodation	Наредба № I-13 от 29 януари 2004 за реда за временно настаняване на чужденци, за организацията и дейността на специалните домове за временно настаняване на чужденци	ORD I-13/04	<a href="https://bit.ly/4bPwXs6">https://bit.ly/4bPwXs6</a> (BG)
Internal Rules of Procedure in immigration detention centers under the Migration Directorate of the Ministry of Interior, adopted on 16 June 2016 (№5364p-20628)	Правилник за вътрешния ред в специалните домове за временно настаняване на чужденци при Дирекция "Миграция" при Министерството на вътрешните работи, утвърден с № 5364p-20628 от 16.06.2016 г. от директора на дирекция "Миграция" - МВР	Detention Rules	<a href="https://bit.ly/2RnPVxr">https://bit.ly/2RnPVxr</a> (BG)
Ordinance № 208 of 12 August 2016 on rules and conditions to conclude, implement and cease integration agreements with foreigners granted asylum or international protection	Постановление № 144 от 19 юли 2017 г. за приемане на Наредба за условията и реда за сключване, изпълнение и прекратяване на споразумение за интеграция на чужденци с предоставено убежище или международна закрила	Integration Ordinance	<a href="https://bit.ly/3P0tayl">https://bit.ly/3P0tayl</a> (BG)

## Overview of the main changes since the previous report update

The report was previously updated in **April 2025**.

### National context

After nearly five years of constitutional crisis since May 2021, which led to a series of seven general elections, six caretaker cabinets, one regular and one rotational government, the last election – taking place in October 2024 - produced a regular government, which took office in January 2025.<sup>3</sup> It was formed as a coalition between the parties GERB (ГЕРБ), ITN (ИТН), and BSP (БСП). The first of them, GERB, led by Boyko Borissov, governed the country with brief interruptions from 2009 to 2021, and is therefore perceived by the public as mainly accountable for the current severe political and economic crisis and overwhelming corruption. The second, ITN, positioned as an anti-establishment party founded by a former TV show host, and the third - the ex-communist party BSP - were both sharing pro-Russian and anti-European political views and agendas. All decisions of the government in 2025, however, were also consistently not only supported, but also navigated by the party DPS–New Beginning (ДПС-НН), led by Delyan Peevski, sanctioned<sup>4</sup> in 2021 under the US Global Magnitsky Act. This party was formed in 2024 and, by mid-2025, had managed to take over the structures of the DPS (ДПС) party<sup>5</sup>. The latter was established in the early 1990s, formally as a party representing the Turkish minority in Bulgaria, but in fact as a project of the former communist security services<sup>6</sup>. According to several public admissions<sup>7</sup> by its founder and long-time leader Ahmed Dogan, it was the party that had effectively ruled the country over the past 30 years through blatant influence peddling<sup>8</sup>. Public opinion<sup>9</sup> mostly considers the GERB, BSP and DPS parties primarily responsible for causing the present state of inescapable corruption, shattered economy, politically subdued judiciary, suffocated media and mass manipulations of election votes. The government opposition, the self-proclaimed as liberal opposition party PP (ПП) in coalition with Democratic Bulgaria (ДБ) found themselves under institutional attacks<sup>10</sup>, persecution through criminal prosecution<sup>11</sup> and therefore continue failing to bring balance and prevent even worse legal and practical arrangements, relentlessly introduced by the government or the majority in the parliament aiming at removing the last standing standards and safeguards of the democratic governance and justice within the society. However, the growing public discontent over years of poor governance, rampant corruption, and the lack of justice erupted in November–December 2025, when the government proposed the draft budget for the following year, in which spending on the state administration and investment projects were significantly increased at the expense of a corresponding rise in the tax burden on population and the private sector. For the first time, mass civic protests were held not only in the capital, Sofia, but also in most major cities across the country, as well as in various European cities with large Bulgarian diaspora

<sup>3</sup> Deutsche Welle, България има правителство: кабинетът Желязков пое властта, published on 16 January 2025, available [here](#) in Bulgarian.

<sup>4</sup> Free Europe, САЩ санкционираха Пеевски и Божков заради корупция, 2 June 2021, available [here](#) in Bulgarian.

<sup>5</sup> bTV, Хронология на една раздяла : Игра на тронове в ДПС, published on 2 September 2024, available [here](#) in Bulgarian.

<sup>6</sup> Register of state security and intelligence agents during the communist period 1944-1989, available [here](#) in Bulgarian.

<sup>7</sup> Mediapool.bg, Доган: Имаме си обръч от фирми – те ни финансират, ние им помагаме, published on 26 June 2005, available [here](#) in Bulgarian.

<sup>8</sup> Institute for market Economics, Олелията около „обръчите“ и „олигархиите“, published on 16 December 2006, available [here](#) in Bulgarian.

<sup>9</sup> Deutsche Welle, Моделът Доган-Пеевски: Заложници сме всички и самото ДПС, published on 28 August 2024, available [here](#) in Bulgarian, and also afera.bg, Ахмед Доган и обръчите от фирми, published on 4 November 2008, available [here](#) in Bulgarian.

<sup>10</sup> Deutsche Welle, Защо всички стрелят по ПП-ДБ, published on 16 June 2025, available [here](#).

<sup>11</sup> Free Europe, Кирил Петков получи обвинение за опит за принуда, published on 28 March 2025, available [here](#) in Bulgarian, also, Mediapool.bg, Благомир Коцев: Вместо прокуратурата да търси истината, очаква да доказвам невинността си, published on 9 October 2025, available [here](#) in Bulgarian; sega.bg, Прокуратурата привика зам.-кмета на София по екологията, published on 9 October 2025, available [here](#) in Bulgarian.

communities<sup>12</sup>, on 26 November and 1 December, culminating on 10 December<sup>13</sup>, International Human Rights Day, when the protest in the capital alone gathered more than 150,000 people<sup>14</sup>. The following day, the government resigned<sup>15</sup>, and Bulgaria began preparations for its eighth snap elections in the past five years<sup>16</sup>, which were scheduled for 19 April 2026.<sup>17</sup>

This political situation had an extremely negative impact on Bulgaria's national asylum system. The government formed in January 2025 assigned to Vice PM Atanas Zafirov (BSP)<sup>18</sup> the responsibility of exercising political oversight over the national asylum authority — the State Agency for Refugees (SAR). On 4 June 2025, at his proposal and without providing any justification, the government dismissed<sup>19</sup> SAR expert leadership, appointed in April 2022, which had successfully managed both the crisis involving Ukrainian refugees in the same year<sup>20</sup> and the following crisis related to the highest number of third-country nationals applying for international protection in 2024<sup>21</sup>. Two long retired army colonels were appointed instead as chairperson<sup>22</sup> and deputy chairperson<sup>23</sup> of the State Agency for Refugees. The latter has been appointed twice by GERB as a chairperson of the asylum agency (2010–2013 / 2015–2016) and twice dismissed by the very governments that had appointed him. His first dismissal came in 2013 on account of him causing a severe humanitarian crisis<sup>24</sup>, where the reception conditions for asylum seekers, most of whom from Syria, were unanimously described<sup>25</sup> as inhuman and degrading. Subsequently, he was reinstated as SAR chairperson (2015–2016), only to be dismissed shortly due to alleged irregularities<sup>26</sup> in public procurement procedures for food supplies in refugee reception centres.

## EU Pact on Migration and Asylum

In this political and institutional context, as described in the paragraph above, preparations for the implementation of the EU Pact on Migration and Asylum stalled. According to the National Plan for Pact implementation adopted by the government<sup>27</sup>, alongside other technical and organizational measures, two key legislative amendments were envisaged: the drafting of an entirely new Law on Asylum and Refugees, with a deadline for adoption of 31 December 2025<sup>28</sup>, as well as amendments to the provisions of the primary and secondary immigration legislation in order to establish rules for screening and detention of third-country nationals after the expiry of the 24-hour police arrest period, again with a deadline for adoption<sup>29</sup> by 31 December 2025. Other measures in the Plan provided for the establishment of screening

<sup>12</sup> bTV, Масови протести срещу властта в над 25 града у нас и в Европа, 10 December 2025, available [here](#) in Bulgarian.

<sup>13</sup> clubz.bg, Исторически протест: 120-150 000 души се събраха в центъра на София, 10 December 2025, available in Bulgarian at: <https://clubz.bg/168853>.

<sup>14</sup> clubz.bg, Пак сме много 3.0, 10 December 2025, available at: <https://clubz.bg/168850>.

<sup>15</sup> Council of Ministers, Министър-председателят Росен Желязков депозира оставката на правителството, 11 December 2025, available [here](#) in Bulgarian.

<sup>16</sup> Central Elections Commission, Archive of general elections, available at: <https://www.cik.bg/bg/37>

<sup>17</sup> State Gazette, Decree №58 for general elections, 19 February 2026, available [here](#) in Bulgarian.

<sup>18</sup> Deutsche Welle, Атанас Зафиров е новият лидер на БСП, 16 February 2025, available [here](#) in Bulgarian.

<sup>19</sup> Banker.bg, Кабинетът Желязков освободи Мариана Тошева от поста председател на Държавната агенция за бежанците, published on 4 June 2025, available [here](#) in Bulgarian.

<sup>20</sup> See, [AIDA Country Report on Bulgaria – Update on 2022](#).

<sup>21</sup> See, [AIDA Country Report on Bulgaria – Update on 2024](#).

<sup>22</sup> balkanec.bg, Иван Иванов е назначен за председател на Държавната агенция за бежанците, published on 4 June 2025, available [here](#) in Bulgarian.

<sup>23</sup> marginalia.bg, Правозащитници и доброволци: Незабавно да се отмени назначението на Казаков за шеф на ДАБ, published on 9 January 2015, available [here](#) in Bulgarian.

<sup>24</sup> Deutsche Welle, Българската трагедия на сирийските бежанци, 12 October 2013, available [here](#) in Bulgarian.

<sup>25</sup> Портал Култура, Бежанците в спирата на недоверието, 21 October 2013, available [here](#) in Bulgarian.

<sup>26</sup> News.bg, Уволниха шефа на Агенцията за бежанците, 22 February 2016, available [here](#) in Bulgarian.

<sup>27</sup> Legal Information Portal of the Council of Ministers of the Republic of Bulgaria, Decision №883 from 19 December 2024 adopting Plan for Implementation by the Republic of Bulgaria of the European Union's Pact on Migration and Asylum, published on 21 January 2025, available [here](#) in Bulgarian.

<sup>28</sup> Decision №833 from 19 December 2024 adopting Plan for Implementation by the Republic of Bulgaria of the European Union's Pact on Migration and Asylum, published on 21 January 2025, available [here](#) in Bulgarian, point 3.1.1.

<sup>29</sup> Decision №833 from 19 December 2024 adopting Plan for Implementation by the Republic of Bulgaria of the European Union's Pact on Migration and Asylum, published on 21 January 2025, available [here](#) in Bulgarian, point 2.1.1.

centres under the General Directorate Border Police (GDBP) in Elhovo and Dragoman, as well as the construction of three screening centres for the immigration police (Directorate Migration, DM) — two for unaccompanied minors: one in Sofia, with a capacity of 50 places, and one in Elhovo, with a capacity of 90 places; and one screening centre in Lyubimets for irregular third-country nationals identified within the interior of the country, with a capacity of 540 places.

As of the date of this report, none of the measures described above had been implemented. While the delay in establishing the screening centres is not critical, given that the police authorities are adapting for this purpose buildings within already existing police detention facilities, the fact that relevant legislation has not yet been amended might lead to missing the deadline of 12 June 2026. Nevertheless, amendments to the primary immigration legislation relating screening procedure have been finalized by the Ministry of Interior, and their publication for public consultation, concluded on 4 May 2026,<sup>30</sup> though its submission to Parliament initially planned<sup>31</sup> for April 2026 will be further delayed. However, the adoption of the new Law on Asylum and Refugees has been drastically compromised. On 24 February 2025, an inter-institutional working group under the State Agency for Refugees began work on the draft law, and by mid-May 2025 four chapters had been prepared and agreed upon. Following the dismissal of the Agency's leadership on 4 June 2025, the inter-institutional working group did not hold a single meeting until 7 November 2025, when the participating government stakeholders were invited to be presented with a final version of an entirely different draft law prepared by legal experts of the Agency. Despite the predominantly negative opinion expressed on this draft by the members of the inter-institutional working group, in January 2026 the caretaker government published the draft law for public consultation<sup>32</sup> without having conducted the formal inter-ministerial coordination procedure with the ministries and other competent authorities. By the close of the public consultation procedure on 25 February 2026, all opinions submitted on the draft law were against its adoption as failing to provide even the most basic procedural arrangements, required for the implementation of the Pact's provisions.<sup>33</sup>

#### *Asylum procedure*

- ❖ **Access to the territory:** Intensified border control measures were applied from the beginning of 2025 as part of the conditions, agreed by Austria to consent for Bulgaria's full Schengen accession on 1 January 2025. It comprised the deployment of 1,200 national border police officers and 240 Frontex officials in mixed land patrol teams. Additionally, another 100 officers from various countries, including 40 Romanian, 15 Austrian, 20 Hungarian, and 25 Bulgarian border guards began operation since 3 February 2025<sup>34</sup>. The border surveillance was also updated with new echolocation equipment, drones and high passable vehicles. These combined measures resulted in 64% overall decrease in the annual number of apprehended newly arrived irregular third country nationals (3,306 migrants) in comparison with the previous year (9,208 migrants). The changes in the political situation in Syria at the end of 2024, and mass deportations of Afghan nationals from Iran in the summer of 2025 – both nationalities that have been the first two top arrivals to Bulgaria over the last decade -, also led to a decrease of the border pressure and the number of the prevented irregular entries, which marked 72% decrease (2025: 13,568 prevented entries / 2024: 52,534 prevented entries). Although officially referred to as irregular migrants, who before entering the border with Bulgaria voluntarily decided to return back to the territory of neighbouring countries (i.e. Türkiye),<sup>35</sup> monitoring shows<sup>36</sup> that these numbers represent to a great extent those who attempted to enter the country, but were pushed back either at the border

<sup>30</sup> Law amending the Law on Foreigners in the Republic of Bulgaria, published for consultations on 1 April 2026, ref. #12253-K, available in Bulgarian [here](#).

<sup>31</sup> Teleconference with MOI Legal and Information Directorate on 2 March 2026.

<sup>32</sup> Portal for Public Consultations, Law on International Protection draft, published on 26 January 2026, available [here](#) in Bulgarian.

<sup>33</sup> Ibid.

<sup>34</sup> Sega.bg, Полиции от Австрия, Румъния и Унгария застанаха на границата ни с Турция, published on 3 February 2025, available [here](#) in Bulgarian.

<sup>35</sup> MOI statistics, December 2025 Report, Migrants, who independently returned to the territory of neighbouring countries, Tables on page 2, published on 27 January 2026, available in Bulgarian at: <https://bit.ly/49x8Dd3>.

<sup>36</sup> GDBP-UNHCR-ВНС, 2024 Annual Border Monitoring Report, page 7, published on 25 June 2025, available [here](#).

or apprehended while already on Bulgarian territory after an irregular border crossing. At the same time, the percentage of irregular migrants officially apprehended at the border with Türkiye (90%) remained the highest when compared to other borders.<sup>37</sup> Since 2014, for ten consecutive years, the percentage of irregular migrants successfully entering from Türkiye has remained significantly low compared to those apprehended at exit borders or within the territory, largely due to the widespread practice of pushbacks at this border (see, Asylum procedure, [1. Access to the territory and push backs](#)). This increase is seen as a result of the involvement of Frontex and other EU countries deployment in mixed border patrols along the land border with Türkiye. Once officially arrested, irregular migrants are provided with information on available legal procedures and can apply for international protection either at 24-hour border detention facilities or after their transfer to pre-removal (detention) centres inland. The overall decline in new arrivals entering from neighbouring Türkiye has also led to a significant 68% drop in registered asylum applications, with just 3,895 applicants in 2025 compared to 12,250 in the previous year. However, 15% of asylum applications (589 applicants) were submitted by the so called self-reported third-country nationals, who are irregular migrants able to enter and move within the country without been detected or apprehended by any of the police authorities.

Another 22,333 Ukrainians<sup>38</sup> were registered under the temporary protection scheme during the year. At the end a 2024, a total of 60,864 temporary protection holders<sup>39</sup> were reported as remaining in the country. However, this information was not updated and kept available throughout 2025, with only official statistics shared as of 30 June 2025, namely - 67,425 temporary protection holders<sup>40</sup>. Thus, it can be reasonable presumed that in 2025 the national asylum system was engaged with 71,320 persons, seeking or enjoying some of the available types of protection in Bulgaria.

- ❖ **Access to the procedure:** Asylum applicants continued to be deprived of direct access to the asylum procedure when apprehended at the border. Just 1.75% of those who were apprehended on the entry border with Türkiye and within the so-called Kapikule-Ormenion-Svilengrad border triangle received direct access to registration and accommodation in a SAR reception centre without first being sent and detained in a MOI deportation centre.<sup>41</sup> On the contrary, since 2022, the SAR started to grant immediate and unhindered access to the asylum procedure to 'self-reported' asylum seekers (see, Asylum Procedure, [Registration of asylum application](#)). 'Self-reported' asylum seekers are those who managed to enter and reach SAR registration centres independently, without being apprehended by the police and detained. In the past, the asylum agency consistently refused to register them directly, instead alerting the police, which then arrested and detained them in deportation centres of the Ministry of the Interior. In some cases, this malpractice was affecting families with minor children and pregnant women. This trend changed from 2022, when this practice affected a total of 94 persons (0.5%) out of 20,407 asylum seekers registered in the country. In 2023, only 48 asylum seekers (0.2%) out of 22,518 suffered from this practice, in 2024 it affected 83 asylum seekers (0.4%) out of 12,250 persons who had lodged an asylum application, where in 2025 it affected 0.1% (4 persons) out of 3,895 asylum applicants.<sup>42</sup> Out of 2,819 asylum seekers registered 0.02% (1 applicant) had their procedure

---

<sup>37</sup> MOI statistics: 1,774 individuals apprehended at entry borders in 2025, of whom 1,600 individuals at the border with Türkiye (2024: 2,543 individuals, of whom 2,432 at the border with Türkiye), available in Bulgarian at: <https://bit.ly/49x8Dd3>.

<sup>38</sup> State Agency for Refugees, 2025 Annual statistics, communicated on 23 February 2026.

<sup>39</sup> See: <https://ukraine.gov.bg/>.

<sup>40</sup> flashnews.bg, България е дала временна закрила на 67 425 украинци, published on 16 August 2025, available [here](#) in Bulgarian.

<sup>41</sup> Monthly Situation Report for December 2025: 28 asylum seekers; according to MOI statistics another 59 unaccompanied children referred by the Border police to Agency for Social Assistance, available in Bulgarian at: <https://bit.ly/49x8Dd3>.

<sup>42</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/4bU9INC>.

conducted irregularly<sup>43</sup> in a MOI deportation centre.<sup>44</sup> Following these improvements, some smugglers adapted quickly and began to deliver smuggled persons directly to open SAR reception centres in Harmanli, Banya and Sofia with many among them with settled representation by private practitioners and false proof of registration at an external address. In January 2025, the head of the Sofia Migration Directorate was arrested for alleged corruption and, among other charges, for alleged registration of false addresses of third country nationals.<sup>45</sup>

- ❖ **Absconding and secondary movements:** The absconding rate continued to decrease in 2025. 34% (2,428 persons) out of 9,946 asylum seekers with pending cases abandoned their asylum procedure in Bulgaria.<sup>46</sup> This represented a decrease of nearly 10% compared to 39% in 2024, 48% of the total registered in 2023, on the background of 46% in 2022, 26% in 2021, 39% in 2020, and 83% in 2019. The main reasons motivating asylum seekers to abandon their asylum procedures in Bulgaria and abscond were the poor reception conditions, low recognition rates for some nationalities, as well as the lack of any integration support or programs provided by the State (see, [Reception Conditions](#)).
- ❖ **Length and quality of the procedure:** In 2025, the SAR issued decisions for 7,090 asylum applicants. Out of this number, 3,895 asylum seekers applied in 2025, while 6,051 asylum seekers had pending cases from 2024.<sup>47</sup> Out of the total number of decisions,<sup>48</sup> 62 granted refugee status, 897 humanitarian status (subsidiary protection under the QD), 3,703 were rejections (of which 1,566 taken in an accelerated procedure) and 2,428 were decisions discontinuing the procedure, mainly due to absconding. It represented an average of 591 decisions taken monthly, issued by 29 case workers (2024: 675 decisions monthly average by 27 case workers) including decisions on termination of procedure due to absconding, or an average of 389 decisions on the merits per month. The average length of the procedure remained between 4 and 6 months.<sup>49</sup> Some improvements in the standards and quality of the asylum procedure were also observed, however other procedural areas showed deterioration<sup>50</sup>. The quality of status determination procedures may worsen in 2026 as far as due to financial constraints UNHCR pulled out all from the national reception centres all of its partner non-governmental activities, including the monitoring of national asylum procedure. This reduction of support was partially compensated by UNICEF, which as of 1 January 2026 commenced monitoring on observation of fundamental rights of children in asylum procedures.
- ❖ **Recognition and refusal rates:** In 2025, the overall recognition rate decreased to 20%, from 61% in 2024, 66% in 2023 and 91% in 2022 of all decisions on the merits. Both refugee recognition and subsidiary protection rates continued to decrease. Refugee recognition decreased to 0.1%<sup>51</sup> and subsidiary protection (defined as 'humanitarian status' under national law) rates fell to 19% in 2025.<sup>52</sup> The rejection rate reached 80%,<sup>53</sup> when considering only

---

<sup>43</sup> §5 Additional Clauses, LAR: SAR can implement asylum procedures outside its premises at places designated for this purpose by an order of the SAR Chairperson prior the establishment of its transit centers; the Pastrogor transit center was open on 3 May 2012. Source: Citybuild, available in Bulgarian [here](#).

<sup>44</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/4bU9INC>.

<sup>45</sup> Bulgarian National Television, 'Началникът на отдел "Миграция" в СДВР е задържан с подкуп', 20 January 2025, available in Bulgarian [here](#).

<sup>46</sup> SAR, reg. №ПО-02-115 from 22 February 2026: 3,895 asylum seekers who applied in 2025 and 6,051 asylum seekers pending determination from 2024.

<sup>47</sup> Ibid.

<sup>48</sup> SAR, Annual statistics for 2025, available in Bulgarian at: <https://bit.ly/3wDKXoU>.

<sup>49</sup> SAR, №ПО-02-115 from 22 February 2026.

<sup>50</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/4bU9INC>.

<sup>51</sup> Previous refugee recognition rates: 0,7% in 2024; 1% in 2023; 2% in 2022; 4% in 2021; 13% in 2020; 13% in 2019; 15% in 2018; 14% in 2017; 25% in 2016; 76% in 2015; 69% in 2014.

<sup>52</sup> Previous subsidiary protection rates: 60% in 2024; 65% in 2023; 89% in 2022; 57% in 2021; 47% in 2020; 15% in 2019; 20% in 2018; 18% in 2017; 19% in 2016; 14% in 2015; 25% in 2014.

<sup>53</sup> Previous rejection rates: 39% in 2024; 39% in 2023; 9% in 2022; 39% in 2021; 39% in 2020; 71% in 2019; 65% in 2018; 68% in 2017; 56% in 2016; 10% in 2015; 6% in 2014.

decisions issued on the substance of asylum claims. The top 5 countries of origin of asylum seekers entering Bulgaria in 2025 were Morocco, Afghanistan, Syria, Iraq and Egypt. Previously, applicants from Syria and Afghanistan constituted the overwhelming majority of asylum application in Bulgaria for a period over a decade, including the previous 2024. The shift was caused by two main factors. Afghan nationals continued to face reduced recognition in 2025, as in 2024 and 2023, with an overall recognition rate of just 4% (0.3% refugee status and 3.7% subsidiary protection) and a 96% rejection rate.<sup>54</sup> The majority (78%) of Afghan applicants<sup>55</sup> continued to abscond before receiving a first instance decision, which was issued on the merits in 22% of the caseload.<sup>56</sup> Additionally, more than 1.5 million Afghans have been forced back to Afghanistan from Iran in 2025<sup>57</sup>, followed by a blockade of the border between the two countries thus preventing to a large extent onward movements to EU. The most radical change, however, related to the drop of recognition rates of Syrian applicants. Since 2014, Syrian applicants have been treated as *prima facie* refugees with the majority of them granted subsidiary protection based on the understanding that they flee from internal armed conflict<sup>58</sup> (see, [Differential treatment of specific nationalities in the procedure](#)). Starting from mid-2024 the SAR initiated individual assessment of Syrian applications, which in 2025 resulted in a 64.2% rejection and 35.8% recognition rate (1.8% refugee recognition rate and 34% subsidiary protection).

- ❖ **Relocation and resettlement:** Since 2015, Bulgaria relocated or resettled a total of 313 individuals. Relocation was conducted with respect to 180 people, of whom 76 from Greece, 10 from Italy and 94 from Cyprus. Since the EU-Türkiye deal, out of the agreed number of 110 individuals, in total 133 Syrian refugees have been resettled. In 2025, two Syrian families with a total of 14 individuals were resettled in Bulgaria from Türkiye.
- ❖ **Legal aid and assistance:** The general legal aid system was introduced in Bulgaria in 2005, extending it to court representation in all types of cases beyond its mandatory provision in criminal, child protection and tort disputes. In 2017, the scope of the legal aid was extended<sup>59</sup> to include oral consultations at the national help line<sup>60</sup> or in regional legal aid centres. The condition for legal aid to be provided is for the person in need of support to lack means and resources to engage a lawyer privately against remuneration, which have to be assessed by the court or the National Bureau for Legal Aid (NLAB)<sup>61</sup>. In practice, due to insufficient NLAB budget<sup>62</sup>, free legal aid is only provided to vulnerable persons – Bulgarians or third country nationals<sup>63</sup> upon their explicit written request. NLAB is situated solely in the capital Sofia without regional offices across the country, and it functions with 23 staff members, who are also responsible for all other national caseload where legal aid should be mandatory rendered, e.g. criminal trials, parental disputes, etc. Therefore, in practice it is impossible for refused asylum seekers to secure legal aid for submission of an appeal in the very tight 7- or 14-days deadlines. Same constraints apply with respect to legal aid provided in regional legal aid centers of local bars<sup>64</sup> which since 2015 have been gradually establishing across the country, where along the lack of expertise in refugee law

<sup>54</sup> 2024 AIDA update: 10% overall recognition rate with 0.3% refugee recognition rate and 9.7% subsidiary protection rate and a 90% rejection rate; 2023 AIDA update: 14% overall recognition with 5% refugee recognition rate and 9% subsidiary protection rate vs 65% rejection / 2022 AIDA update: 49% overall recognition with 14% refugee recognition rate and 35% subsidiary protection rate vs 51% rejection rate.

<sup>55</sup> 1,134 discontinued procedures out of all 1,461 decisions taken in 2025 with respect to Afghan nationals.

<sup>56</sup> See, Table Statistics, pages 8-12 of this report: 1,461 Afghan decisions on the merits.

<sup>57</sup> Office of the UN High Commissioner on Human Rights, UN experts appalled by mass forced returns of Afghan nationals, published on 18 July 2025, available [here](#).

<sup>58</sup> Article 15(c) of 2011/95/EC Directive.

<sup>59</sup> Articles 30d to 30o Law on Legal Aid, as amended St.G. №13 from 7 February 2017.

<sup>60</sup> National Legal Aid Bureau, tel. 0700 18 250.

<sup>61</sup> Article 25(1) and (2) of Law on Legal Aid.

<sup>62</sup> Article 22(8) Law on Legal Aid.

<sup>63</sup> §1(17) from Additional Clauses LAR, namely: children, unaccompanied children, disabled, elderly, pregnant, single parents taking care of underage children, victims of trafficking, persons with serious health issues, psychological disorders or persons who suffered torture, rape or other forms of psychological, physical or sexual violence.

<sup>64</sup> National Legal Aid Bureau, [Regional centers for legal aid](#).

an additional hindrance also constitutes the lack of financial means for interpretation between lawyers and asylum seekers.

As a result, since the establishment of the national asylum authority in 1994, asylum seekers relied entirely on NGOs or private practitioners for those who have sufficient financial means to afford it for their access to the court, namely for drafting and lodging the appeal and subsequent representation during litigation. Therefore, the main support in this respect has historically been provided by the non-governmental organisation Bulgarian Helsinki Committee as UNHCR's main legal implementing partner since the establishment of the national asylum system in 1994. However, due to UN financial crisis BHC was forced to close its legal reception offices on 1 January 2026<sup>65</sup>, thus leaving asylum seekers without a reliable free of charge legal assistance for access to court and timely submission of appeals before the court against negative decisions refusing or revoking international protection. The only free-of-charge legal assistance that remained readily available in this respect<sup>66</sup> is once every two weeks in Sofia, Harmanli and Pastrogor at limited reception time. This assistance, however, will also end on 30 June 2026. (see [Regular Procedure, Legal Assistance at first instance and Legal assistance in appeals](#))

### *Reception conditions*

- ❖ **Reception centres:** Since 2015, the conditions in all national reception centres have been gradually deteriorating, with support limited to accommodation, nutrition and rudimentary medical help without provision of psychological care or assistance.<sup>67</sup> In 2022, a SAR internal revision of the reception centres' capacity revealed it<sup>68</sup> to be far below its long-time declared 5,160 places, mainly because the designated premises were unfit for living. In 2025, SAR reported just 3,125 places available for accommodation in all of its reception centres.<sup>69</sup> During the period from 2022 to mid-2025 the SAR management were largely seen as a merely expert one<sup>70</sup>, without any political endorsement or support, which resulted in severely underfunded agency's budget, respectively<sup>71</sup>, in 2022: 14,095,300 BGN; in 2023: 12,038,218 BGN and in 2024: 11,717,200 BGN. The only budget allocated during this period for repairs or refurbishment<sup>72</sup> of the reception centres was of 145,000 BGN in 2022 with no such means allocated in the 2020, 2021, 2023 or 2024 annual budgets of the asylum agency. In 2025 however, due to the political appointment of a SAR leadership<sup>73</sup> by the government, the SAR received a budget of BGN 16,000,000, of which BGN 3,900,000 solely for capital investments and refurbishment. Notwithstanding, reception centres accommodating applicants during their asylum procedure continued to face persistent issues related to infrastructure and living conditions, often falling below basic standards. In many cases, they failed to provide even the most essential services, including adequate nutrition and sanitation in both personal and communal spaces. Access to regular and hot water, as well as maintenance and repairs in bathrooms, rooms, and common areas, remained highly problematic due to the absence of a dedicated budget for upkeep. Long-standing issues such as infestations of bedbugs, lice, cockroaches, and rats persisted across facilities. The Ovcha Kupel shelter in Sofia, the oldest reception centre, deteriorated to such an extent that at one point, the previous SAR management considered its complete closure.<sup>74</sup> By the end of 2025, the only remaining functional space within the facility continued to be the safe zone for unaccompanied children, managed by the IOM. Residents across all reception centres, except for the Pastrogor transit centre, which remained

---

<sup>65</sup> Bulgarian Helsinki Committee, The BHC Legal Aid Reception for Refugees and Migrants ceased its operation on 1 January 2026, published on 12 January 2026, available [here](#).

<sup>66</sup> UNHCR Representation in Bulgaria, Legal Awareness, available [here](#).

<sup>67</sup> See, AIDA Country Updates on Bulgaria: Forth Update from October 2015, 2016 Update from February 2017, 2017 Update from February 2018, 2018 Update from January 2019, 2019 Update from February 2020, 2020 Update from February 2021 and 2021 Update from February 2022.

<sup>68</sup> 118<sup>th</sup> Coordination meeting held on 22 December 2022.

<sup>69</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>70</sup> See, AIDA Country Update from April 2025, [Overview of the main changes since the previous report's update](#).

<sup>71</sup> SAR reg. №АД-07-47 from 9 December 2024.

<sup>72</sup> SAR reg. №ЦУ-РД05-123/27.02.2024.

<sup>73</sup> See, the paragraph above, National context.

<sup>74</sup> 129<sup>th</sup> Coordination meeting, 9 May 2024.

closed for the duration of 2025 until December, continued to express concerns about poor living conditions, and particularly the persistent issue of bedbug infestations, which frequently led to health problems such as chronic skin inflammations and allergic reactions. Despite regular disinfections throughout 2025, the issue, which first emerged in 2013 and was largely neglected until 2023, remained a serious and ongoing concern.<sup>75</sup>

Food in reception centres was provided through catering arrangements to deliver three meals per day. As catering providers are selected regionally based on the lowest price offer,<sup>76</sup> these vary among the different reception centres. Thus, in the Ovcha Kupel, Voenna Rampa and Vrazhdebna shelters and in the Sofia reception centre these three meals per day were delivered at the price of BGN 5.38, equal to EUR 2.75; in the Harmanli reception center - at the price of BGN<sup>77</sup> 6.54, equal to EUR 3.35; in the Banya reception centre – at the price of BGN 6.24, equal to EUR 3.20; and in the Pastrogor transit centre – at the price of BGN 6.01, equal to EUR 3.08 daily. The individual monthly allowance provided for in the law is not translated into practice as it is not provided since 2015.<sup>78</sup> For this reason, in 2025 asylum seekers continued to complain not only about food quality, but also about its insufficient quantity. The main factor that helped avoiding a point of critical malnutrition for asylum seekers was the drastic 68% decrease of the new arrivals in 2025 and still significant rate of absconding and abandonment of the procedure, which was 34% of the caseload.

Asylum seekers continued to face significant barriers in accessing consistent and specialized healthcare due to the country's chronic shortage of general practitioners. The medical care of asylum seekers was mainly carried out in the surgeries organised in Sofia and Harmanli reception centres, with a total of 3,298 initial medical examinations and 2,144 outpatient examinations in 2025,<sup>79</sup> provided in reception centres by 4 doctors, 1 dentist (RRC Harmanli) and 5 nurses. Even though asylum seekers are health insured, due to its budget restraints SAR fail to meet the medical expenses, which are not covered by the National Health Insurance Fund (NHIF). These costs as well as those for prescribed medicines, lab tests or other medical interventions which are not covered in the health care package, as well as for purchase of baby formula, diapers and other personal hygiene products were provided by the Red Cross, UNICEF and UNHCR.<sup>80</sup>

For many years, the most serious concern relating national reception conditions remained the lack safety and security for asylum seekers accommodated in reception centres. These continued to be seriously compromised due to the presence of smugglers, drug dealers and sex workers who had access to all reception centres during the night hours without any interference from the private security guards. The SAR has been receiving many public disorder complaints both in Sofia and Harmanli, which escalated in public demonstrations and committees requesting the reception facilities to be either closed or turned to closed-type centres.<sup>81</sup> In 2022<sup>82</sup> and 2023,<sup>83</sup> a non-governmental organisation continued raising concerns regarding safety of reception centres. Starting from mid-2022, the SAR submitted several requests to the Ministry of Interior,<sup>84</sup> to engage the police in guarding of the reception centres, but the MOI initiated a procedure in this sense

---

<sup>75</sup> SAR, reg. №ПО-02-115 from 22 February 2026: monthly disinfections.

<sup>76</sup> National Statistical Institute, Annual inflation rates: +5% in 2025; +2.2% in 2024; +9.5% in 2023; and +17% in 2022, available in Bulgarian [here](#).

<sup>77</sup> SAR, reg. №ПО-02-115 from 22 February 2026: prices minus VAT, as follows, RRC Sofia: BGN 4.48; RRC Harmanli: BGN 5.45; RRC Banya: BGN 5.20; TC Pastrogor: BGN 5.01.

<sup>78</sup> SAR, Order No 31-310, 31 March 2015, issued by the Chairperson Nikola Kazakov.

<sup>79</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>80</sup> Ibid.

<sup>81</sup> DW, 'След побоя в София: спусъкът с "Мигранти въвн!", 11 March 2024, available in Bulgarian [here](#); 24 Hours, 'Рехав протест против бежанците се проведе в София, 31 March 2024, available in Bulgarian [here](#); BTV, Протест срещу бежанците в Харманли: Хората настояват те да бъдат преместени извън града, 22 march 2024, available in Bulgarian [here](#); BNR, Жители на Харманли отново протестираха срещу бежанския център, 6 April 2024, available in Bulgarian [here](#).

<sup>82</sup> Bulgarian Helsinki Committee, reg.No.Б-67 from 4 August 2022.

<sup>83</sup> Bulgarian Helsinki Committee, reg.No.Б-88 from 18 September 2023.

<sup>84</sup> SAR, reg. No. №РД05-31 from 15 January 2024; SAR reg. №АД-07-7 from 14 January 2025.

only by the end of 2023,<sup>85</sup> to investigate the possibility for SAR reception centres to be guarded by the national police and gendarmerie. In April 2024, additional amendments to the law were made,<sup>86</sup> but the MOI took over the guarding of the reception centres of the SAR as late as in October 2025.<sup>87</sup> This major change is expected to improve the safety and security of asylum seekers who are accommodated in the reception centres.

- ❖ **Safe zone for unaccompanied children:** The two safe zones for unaccompanied children at the Sofia reception centre continued to be maintained under an IOM project, funded by AMIF until the end of 2025. In 2024, a third safe zone with a capacity for 98 children was opened<sup>88</sup> in the biggest reception centre in Harmanli, following a collaboration with UNICEF and IOM, funded by the Swiss State Secretariat for Migration (SEM). Overall, the conditions in the safe zones were better compared to all other SAR accommodation premises. The abovementioned serious security problems existing in reception centres and their surroundings in 2025 however also affected the overall safety of unaccompanied children. Improvements in this respect are expected following the security being handed over to the police (see, the paragraph above). In 2025, the number of unaccompanied children who sought protection in Bulgaria decreased by 78%.<sup>89</sup> Therefore, the capacity of the three safe zones, totalling 386 places,<sup>90</sup> proved sufficient to accommodate all newcomers, but mainly because the high absconding rate (82%)<sup>91</sup> continued to be a systemic issue regarding the treatment of unaccompanied children. Starting in 2022, SAR began to invest systematic efforts in providing unaccompanied children with accommodation in specialized child care facilities. By 2025, the percentage of children benefiting from this more suitable form of care continued to gradually increase.<sup>92</sup>
- ❖ **Access to benefits:** Asylum seekers who decide to live outside reception centres at their own expenses are not entitled to social benefits.<sup>93</sup> Asylum seekers who are not self-sufficient are entitled to accommodation in the available reception centres, three meals per day, basic medical assistance and psychological support,<sup>94</sup> even though the latter is not secured in practice. In 2025, SAR carried out 74 psychological interviews in application of the SOPs for vulnerability identification and referred unknown number of applicants to the non-governmental organization Nadya Center for further support or treatment<sup>95</sup>. Monthly cash allowance is not provided since 2015<sup>96</sup> until 27 July 2025 when it was reinstated with an amendment of the internal rules of the asylum agency<sup>97</sup> in amount of BGN 20, increased to BGN 30 from 1 August 2025<sup>98</sup>. Access to any other social benefits under the EU *acquis* is not guaranteed by law, nor provided in practice, still raising concerns about compliance with Articles 17, 18 and 25 of the 2013/33 Reception Conditions Directive or Articles 19 and 20 of the 2024/1346 Reception Conditions Directive.
- ❖ **Access to the labour market:** During the asylum procedure, asylum seekers have unconditional access to the labour market after a period of three months from their registration.<sup>99</sup> In 2025, the

---

<sup>85</sup> 127<sup>th</sup> Coordination meeting, held on 28 December 2023.

<sup>86</sup> Article 14, para 5 of the Law on Ministry of Interior, St.G. №33 from 12 April 2024; Bulgarian national television, 'МВР ще охранява центровете за бежанци, решиха депутатите', available in Bulgarian [here](#).

<sup>87</sup> SAR, 2024 Annual Activity Report, published in May 2025, available [here](#) in Bulgarian.

<sup>88</sup> SAR, Откриване на сигурна зона за непридружени деца-бежанци в РПЦ-Харманли, 16 May 2024, available in Bulgarian [here](#).

<sup>89</sup> 2025: 573 unaccompanied children; 2024: 2,601 unaccompanied children; 2023: 3,843 unaccompanied children / 2022: 3,348 unaccompanied children / 2021: 3,172 unaccompanied children.

<sup>90</sup> SAR reg. №АД-07-7 from 14 January 2025.

<sup>91</sup> 2025: 181 substantive decisions, 845 discontinuations of procedure due to absconding.

<sup>92</sup> 2025: 7% or 41 (11 asylum seeking and 30 granted protection) of 573 unaccompanied children; 2024: 3% or 62 children (4 asylum seeking and 58 granted protection) of 2,061 unaccompanied children; 2023: 43 children (2 asylum seeking and 41 granted protection); 2022: 26 children (2 asylum seeking and 24 granted protection).

<sup>93</sup> Article 29 (9) LAR.

<sup>94</sup> Article 29 (1) LAR.

<sup>95</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>96</sup> SAR, Order No 31-310, 31 March 2015, issued by the Chairperson Nikola Kazakov.

<sup>97</sup> SAR, Order [No. and date unspecified] 2025, issued by the Chairperson Ivan Ivanov.

<sup>98</sup> SAR, Order [No. and date unspecified] 2025, issued by the Chairperson Ivan Ivanov.

<sup>99</sup> Law on Asylum and Refugees (LAR), Article 29 (3).

State Refugee Agency issued 847 work permits to asylum seekers and beneficiaries of international protection who were looking to support themselves while their asylum claims were being processed.<sup>100</sup> Out of them, only 2% (3 asylum seekers and 16 persons granted international protection) were employed through employment programs, while the rest found work independently and on their own initiative.<sup>101</sup> At the same time, a total of 315 persons with temporary protection were employed through employment programs.<sup>102</sup>

### *Detention of asylum seekers*

- ❖ **Detention in pre-removal centres:** In 2025, the average duration of detention was of 3 working or 5 calendar days,<sup>103</sup> in full conformity with the law.<sup>104</sup> This could also be attributed to the 68% decrease<sup>105</sup> in the number of asylum seekers in the country compared to previous year, which eased processing of new arrivals by the detention administration. As a result, of all third-country nationals who applied for protection in a police detention centre, 87%<sup>106</sup> were released within the statutory deadline, and no one was unlawfully detained for more than 6 months. First introduced in 2015, the SAR practice of registering asylum seekers in police pre-removal (detention) centres to meet the registration deadline,<sup>107</sup> as well as conducting proceedings and delivering decisions in these detention centres, was not sanctioned by national courts,<sup>108</sup> which in most cases regarded it as an infringement of the procedure of limited importance. Starting in 2022, the SAR took significant steps to address this malpractice, ultimately achieving its complete elimination by 2024, with no registrations or determinations conducted in a police pre-removal detention centre. However, in 2025 SAR again resumed this malpractice, though applied in just one individual case, which consisted 0.02% of the caseload.<sup>109</sup>
- ❖ **Detention in closed reception centres:** National legislation allows detention pending the asylum procedure, although on limited grounds and for the shortest period possible.<sup>110</sup> Since the introduction of the provision,<sup>111</sup> in total 269 asylum seekers have been detained in closed reception centres<sup>112</sup> pending their status determination situation, mainly based on national security grounds, of whom 31 asylum seekers in 2025.<sup>113</sup> The average duration of detention in closed reception centres increased, reaching 89 days on average in 2025.<sup>114</sup>

### *Content of international protection*

- ❖ **Civil registration:** To be registered in the national database, any beneficiary of international protection has to indicate, *inter alia*, a domicile.<sup>115</sup> Following the peak of arrivals and recognitions in 2014-2016 the newly recognised beneficiaries who have lived in reception centres were no

<sup>100</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>101</sup> Employment Agency, reg. No. ПД-08-16 from 7 January 2026.

<sup>102</sup> Ibid.

<sup>103</sup> 2024: 4 working/6 calendar days; 2023: 5 working/7 calendar days; 2022: 6 calendar/4 working days; 2021: 7 calendar/5 working days; 2020: 8 calendar/6 working days; 2019: 11 calendar/9 working days; 2018: 9 calendar/7 working days; 2017: 19 calendar/15 working days; 2016: 9 calendar/7 working days; 2015: 10 calendar/8 working days; 2014: 11 calendar/9 working days; 2013: 45 days/32 working days.

<sup>104</sup> Article 58(4) LAR, Article 6(2) APD: 6 working days.

<sup>105</sup> 2024: 3,895 asylum seekers; 2023: 22,518; 2022: 20,407 asylum seekers / 2023: 22,518 asylum seekers.

<sup>106</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/4bU9INC>.

<sup>107</sup> 6 working or 8 calendar days as per Article 58(4) LAR in conjunction with Article 6(1) APD.

<sup>108</sup> See, AIDA updates on Bulgaria in 2019 to 2021.

<sup>109</sup> BHC 2025 Annual RSD Monitoring report, 1.1.2. Procedure at the police detention centers, page 8, available at: <https://bit.ly/3Y3WzJJ>.

<sup>110</sup> Article 45b LAR.

<sup>111</sup> State Gazette No.80 from 16 October 2015, enforced on 1 January 2016.

<sup>112</sup> Until December 2025: a special compartment allocated in Busmantsi detention center's premises; starting from December 2025: Pastrogor transit center.

<sup>113</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>114</sup> 2024: 86 days; 2023: 78 days; 2022: 56 days; 2021: 86 days; 2020: 91 days; 2019: 252 days; 2018: 192 days, 2017: 202 days.

<sup>115</sup> Article 90 (1) Law on Civil Registration.

longer permitted by the SAR to state the address of the respective reception centre as domicile. Therefore, since the end of 2016 beneficiaries of international protection could not provide a valid address or domicile in order to be registered in national civil registrations database and obtain national ID number, which is a prerequisite to be issued a valid identity document. This legal 'catch 22' has led to continuous malpractices, including false renting and address registrations for the sake of enabling beneficiaries to obtain identity documents, as the valid identity document is a pre-condition to exercising their rights. Following extensive advocacy efforts from civil society organisations, the law was amended in October 2024,<sup>116</sup> to enable<sup>117</sup> the newly recognised refugees and subsidiary protection holders who cannot state a domicile address when registering for the first time in the population register, or applying for a permanent or current address, to be registered at an officially prescribed service address by the municipality where they have established their habitual residence. This provision was auxiliary to same arrangements introduced for nationals without official domicile, and entered into force on 8 December 2024, with all municipalities obliged until 8 January 2025 to assign service address or addresses to be able to implement the new arrangement. In total, 13,130 beneficiaries of international protection – respectively, 5,144 refugee status holders and 7,986 subsidiary protection holders - were issued identity documents on the basis of assigned service address<sup>118</sup> since the entry into force of the arrangement until 31 December 2025.

- ❖ **Integration:** In 2025, no data was shared for integration agreements concluded with respect to family members.<sup>119</sup> No other integration measures or activities were planned, funded or available to individuals granted international protection – refugee or humanitarian status. On 2 May 2025 the government finally adopted<sup>120</sup> a Program for Humanitarian Assistance and Integration of displaced persons from Ukraine under temporary protection in Bulgaria. However, the so-called integration measures consist of enlisting different agencies and institutions and their competencies with respect to ensure access to certain integration related rights, rather than real and concrete measures of material assistance, employment or other support for integration. Thus, Bulgaria marked its 12<sup>th</sup> year of the national “zero integration” policy.
- ❖ **Special measures for unaccompanied children:** The asylum authority, SAR, continued to actively search opportunities to accommodate unaccompanied children in licensed family-type children's centres (ЦХСТ). During the asylum procedure such efforts were undertaken mainly regarding minor asylum-seeking children,<sup>121</sup> children with special needs or such identified as being at increased risk of trafficking or harm. After recognition, these efforts targeted all unaccompanied children, excluding those in family reunification procedures, who were allowed to wait for the reunification with their parents or other family members in SAR reception centres.<sup>122</sup> As a result of this positive practice, a total of 41 unaccompanied children were accommodated during the course of the year in specialized childcare centres, of whom 11 were asylum seeking children and 30 children granted international protection. Altogether 12 residential child care facilities across the country were engaged as well as 4 foster housings (foster families or relatives). At the same time, it is important to consider the lack of specialized institutional training for the childcare centres' staff to work with unaccompanied children seeking or granted protection, as well as the absence of funding for interpretation services, at least during the initial period of accommodation and adjustment.

<sup>116</sup> State Gazette No.85 from 8 October 2024.

<sup>117</sup> Article 93 (6), as well as §1 Additional Clauses Law on Civil Registration.

<sup>118</sup> MOI, Identity Documents Directorate, reg. №812104-1103 from 10 February 2026.

<sup>119</sup> Statistics provided by the SAR Deputy Chair on Social Matters on 3 February 2025; 2024: 2 beneficiaries of international protection; 2023: 22 beneficiaries of international protection; 2022: 20 beneficiaries; 2021: 83 beneficiaries.

<sup>120</sup> COM №278 from 2 May 2025, available in Bulgarian [here](#).

<sup>121</sup> Articles 3 and 4 Law on Persons and Entities: 0-13 minors / 14-17 adolescents.

<sup>122</sup> SAR, Rules and procedures on the accommodation of unaccompanied children granted international protection in foster families, social or integrated socio-medical care facilities for children of a residential type, adopted in October 2022.

- ❖ **Cessation and withdrawal:** National law envisaged an additional cessation clause compared to the 1951 Refugee Convention.<sup>123</sup> The law permitted cessation or revocation of the international protection if the status holders fail, in a period of thirty days, to renew their expired Bulgarian identity documents or to replace them if they have been lost, stolen or destroyed. The undue cessation of international protection has affected 4,405 status holders in total since then, respectively – 770 persons in 2018; 2,608 persons in 2019; 886 persons in 2020 and 100 persons in 2021 and 41 persons in 2022. In 2024, this malpractice was fully abandoned by SAR, with 0 cessations made on this additional ground. In 2025 the SAR ceased 850 granted statuses, of which 292 refugee statuses and 558 subsidiary protections (humanitarian statuses). As far as known, there was no indication or statement made with respect to the legal ground for these cessations it cannot be concluded with certainty that the SAR resumed the malpractice.

## Temporary protection (see [Temporary Protection Annex](#))

### *Temporary protection procedure*

- ❖ **Key statistics on temporary protection:** As of 31 December 2025, a total of 223,817 were registered under temporary protection. Out of this number, 52,535 were men, 107,422 women and 63,271 children (589 unaccompanied).
- ❖ **Registration:** At the beginning of 2026, following the fourth TP duration extension until 4 March 2027, the SAR announced that the renewal of the issued TP id. cards could be done both at SAR centers as well as the national police stations until 30 April 2026.

### *Content of temporary protection*

- ❖ **Housing:** As of 31 December 2025, 2,840 vulnerable individuals remained accommodated under the state sponsored humanitarian aid programmes.
- ❖ **Access to the labour market:** The national Employment Agency stated that it does not have information about the overall number of the TP holders who were employed and working at the national labour market in 2025. The number of TP beneficiaries who found employment through governments employment services and schemes, who in 2022 were 2,198; 1,484 in 2023, 272 in 2024 and 315 in 2025.
- ❖ **Access to education:** In 2025/2026, the kindergartens admitted 1,307 children with temporary protection, whereas 5,379 pupils with temporary protection were enrolled in the schools, of whom 517 first-graders.

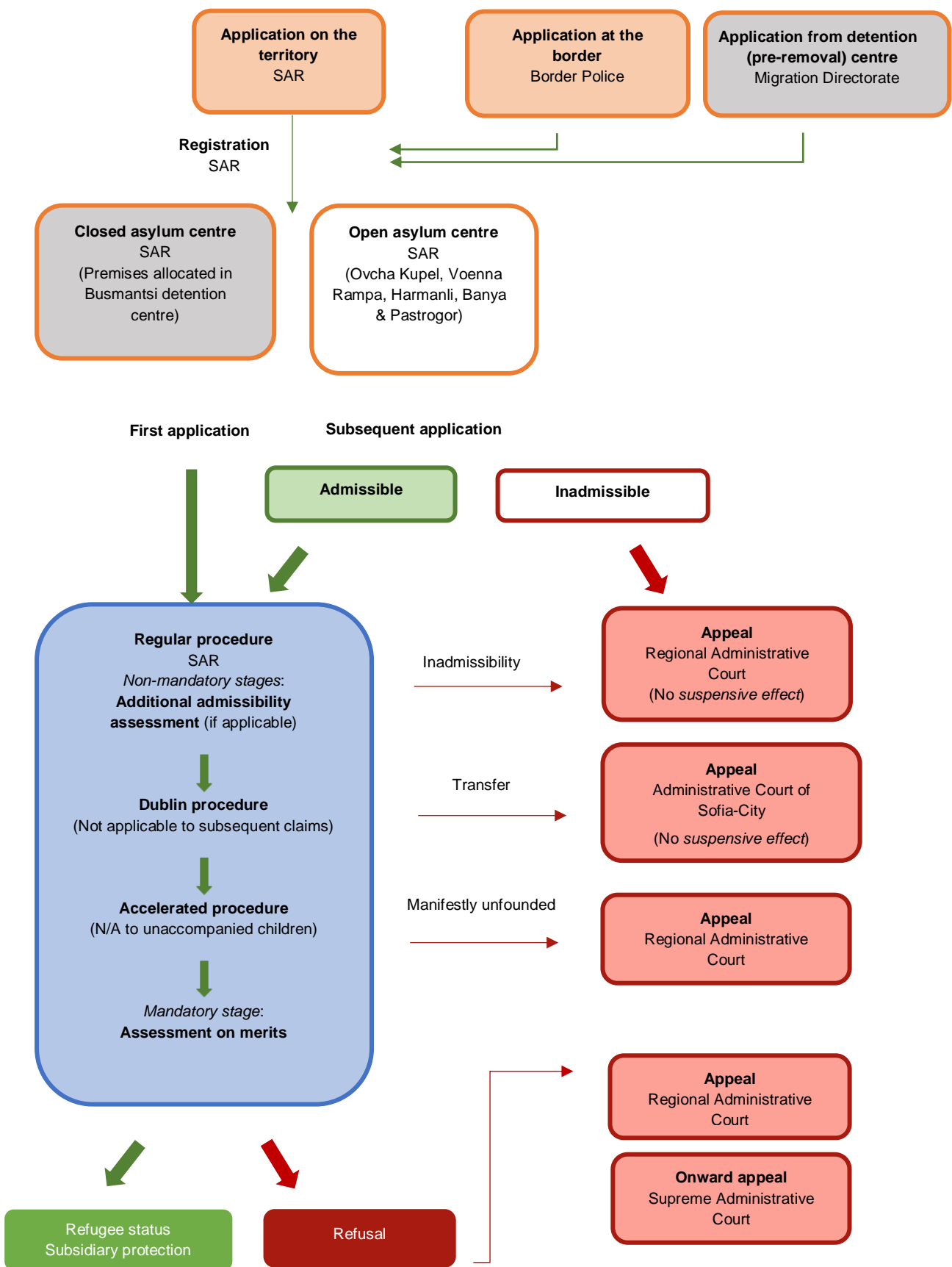
---

<sup>123</sup> Article 42(5) LAR, State Gazette No. 89 from 16 October 2020.

# Asylum Procedure

## A. General

### 1. Flow chart



## 2. Types of procedures

### Indicators: Types of Procedures

1. Which types of procedures exist in your country?
- ❖ Regular procedure:
    - Prioritised examination:<sup>124</sup>  Yes  No
    - Fast-track processing:<sup>125</sup>  Yes  No
  - ❖ Dublin procedure:  Yes  No
  - ❖ Admissibility procedure:  Yes  No
  - ❖ Border procedure:  Yes  No
  - ❖ Accelerated procedure:<sup>126</sup>  Yes  No
  - ❖ Other:  Yes  No
2. Are any of the procedures that are foreseen in the law, not being applied in practice?  
 Yes  No

## 3. List of the authorities intervening in each stage of the procedure

Stage of the procedure	Competent authority (EN)	Competent authority (BG)
Application	State Agency for Refugees (SAR) & any state authority	Държавна агенция за бежанците (ДАБ) и друг държавен орган
National security clearance	State Agency for National Security (SANS)	Държавна агенция "Национална сигурност"
Dublin procedure	State Agency for Refugees (SAR)	Държавна агенция за бежанците (ДАБ)
Admissibility procedure	State Agency for Refugees (SAR)	Държавна агенция за бежанците (ДАБ)
Accelerated procedure	State Agency for Refugees (SAR)	Държавна агенция за бежанците (ДАБ)
Refugee status determination	State Agency for Refugees (SAR)	Държавна агенция за бежанците (ДАБ)
First appeal	Regional Administrative Court	регионален административен съд по местоживеене
Onward appeal	Supreme Administrative Court	Върховен административен съд
Revocation / Withdrawal	State Agency for Refugees (SAR)	Държавна агенция за бежанците (ДАБ)

## 4. Determining authority

Name in English	Number of staff as of 31 December 2024	Ministry responsible	Is there any political interference possible by the responsible Minister with the decision making in individual cases by the determining authority?
State Agency for Refugees (SAR)	395 <sup>127</sup>	Council of Ministers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Source: SAR.

<sup>124</sup> For applications likely to be well-founded or made by vulnerable applicants. See Article 31(7) recast Asylum Procedures Directive.

<sup>125</sup> Accelerating the processing of specific caseloads as part of the regular procedure.

<sup>126</sup> Labelled as "accelerated procedure" in national law. See Article 31(8) recast Asylum Procedures Directive.

<sup>127</sup> Of whom 29 case workers, SAR, reg. №ПО-02-115 from 22 February 2026.

The SAR is competent for examining and deciding on applications for international protection. It is thus the authority competent for granting or not the two existing types of international protection; namely refugee status or subsidiary protection (“humanitarian status”).<sup>128</sup> The SAR has different Units composed of caseworkers dealing with specific procedures, such as the Dublin Unit handling Dublin procedures, and specialised caseworkers dealing with accelerated procedures.

In case of mass arrivals where individual asylum applications cannot be processed, a temporary protection status is granted by the government following a collective decision made by the EU Council.<sup>129</sup> The SAR has an advisory role to the government in this respect when it decides whether to communicate to the EU Council a request for temporary protection decisions to be taken on a group basis in cases of a mass influx of asylum seekers who flee from a war-like situation, gross abuse of human rights or indiscriminate violence. These forms of individual or collective protection can be applied without prejudice to the authority of the Bulgarian President to grant asylum to any foreigner based on the national constitution if he or she is persecuted for convictions or activities undertaken to protect internationally recognised rights or freedoms.<sup>130</sup>

Moreover, the chairperson of the SAR who is responsible for taking the first instance decision on the asylum claim is also in charge of the appointment of the SAR officials responsible for taking decisions in the Dublin procedure<sup>131</sup> and in the accelerated procedure.<sup>132</sup>

Internal guidelines provide an extensive description of each procedural step and activity to be undertaken by all SAR staff involved in processing applications for international protection (e.g. registrars, social workers, caseworkers, officials of the legal department etc.) They do not regulate, however, how to conduct interviews, instead they refer to EUAA interviewing guidelines.<sup>133</sup> For the first time in 2023, the SAR Internal guidelines were published and made available to third parties.<sup>134</sup>

Regarding the decision-making process, the SAR has an *ex-ante* review mechanism in place whereby the caseworker, the head of the respective reception centre and the legal department of the SAR must agree on a draft decision that is then transferred to the SAR’s chairperson for the final decision.

In terms of quality assurance and control, UNHCR is authorized by law to monitor every stage of the asylum procedure. The Agency’s implementing partner, the Bulgarian Helsinki Committee, also exercises this right on behalf of UNHCR. The quality monitoring activities carried out by the Bulgarian Helsinki Committee on behalf of UNHCR involve evaluation of the following stages of the procedure: eligibility interviews, first instance decisions, and appeal hearings in court.

The SAR has further established a Quality of Procedure Directorate which controls the quality of the procedure through regular and random sampling of decisions. Based on its findings, the Quality of Procedure Department issues guidance on the interpretation of legal provisions and the improvement of different stages of the procedure. The issued guidance remains internal; it is neither shared nor made public.

In September 2022, four years after the end of the previous operating plan, the EUAA and Bulgaria signed a new operating plan with regard to support for temporary protection and implementation of the Common European Asylum System.<sup>135</sup> In view of the persisting pressure on the Bulgarian asylum and reception

---

<sup>128</sup> Article 2(3) LAR.

<sup>129</sup> Article 2(2) LAR.

<sup>130</sup> Article 27(1) in conjunction with Article 98(10) Bulgarian Constitution.

<sup>131</sup> Chapter VI, Section Ia. LAR.

<sup>132</sup> Article 70 LAR.

<sup>133</sup> Article 49 (4) SAR Internal Guidelines.

<sup>134</sup> State Agency for Refugees, available in Bulgarian at: <https://bit.ly/49Titpr>.

<sup>135</sup> EUAA, ‘EUAA deploys to Bulgaria as over 530,000 Ukrainians enter the country’, 6 September 2022, available at: <http://bit.ly/3kXMaBK>.

systems, the operational plan was amended and extended in December 2022.<sup>136</sup> In July 2023, the EUAA and Bulgaria agreed on a new operational plan covering the period 2023-2024.<sup>137</sup> In December 2024, the EUAA and Bulgaria signed an amendment, extending the operational plan into 2025 and 2026, for provision of support on asylum procedures and reception.<sup>138</sup>

In 2025, the EUAA deployed 47 experts to Bulgaria,<sup>139</sup> mainly external experts (36). They were deployed mainly as protection experts (9), reception and site management experts (7), asylum procedures experts (5), junior reception experts (5).<sup>140</sup>

As of 15 December 2025, there were 26 EUAA experts deployed in Bulgaria, notably 7 protection experts, 6 reception and site management experts, 4 asylum procedures experts, and 3 access to asylum procedures experts.<sup>141</sup>

## 5. Short overview of the asylum procedure

It is possible to claim international protection on the territory, at borders before the Border Police staff, or in detention centres before the Migration Directorate staff, either of which are obligated to refer it immediately to the SAR.<sup>142</sup> The SAR is required to formally register the referred applications no later than 6 working days from their initial submission before another authority. The asylum application should be made within a reasonable time after entering the country, except in the case of irregular entry / residence when it ought to be made immediately,<sup>143</sup> otherwise it could be ruled out as manifestly unfounded.<sup>144</sup> The law does not foresee a maximum time limit for lodging the asylum application. If the asylum application is made before a state authority other than the SAR, status determination procedures cannot legally start until the asylum seeker is physically transferred from the border or detention centre to any of the SAR's reception centres for the so-called registration "in person" or "personal registration".<sup>145</sup>

The asylum procedure stages are unified in one, single regular procedure. Dublin and accelerated procedures are now considered as non-mandatory phases of the status determination, applied only by a decision of the respective caseworker, if and when information or indications are available to either engage the responsibility of another Member State to determine the asylum application in question,<sup>146</sup> or to consider the asylum application as manifestly unfounded respectively.<sup>147</sup>

**Admissibility procedure:** An application can be deemed inadmissible if the applicant has been granted protection or a permanent residence permit in another EU Member State or "safe third country".<sup>148</sup> An admissibility assessment is also conducted with respect to subsequent applications which provides the opportunity to consider their admissibility based on a preliminary examination whether new elements or findings have arisen or been presented by the applicant relating to his personal situation or country of origin.<sup>149</sup> An amendment of the national asylum law<sup>150</sup> was presented following the recommendations

---

<sup>136</sup> EUAA, *Operational Plan 2022-2023 agreed with the European Union Agency for Asylum and Bulgaria*, December 2022, available at: <https://bit.ly/46wdfyf>.

<sup>137</sup> EUAA, *Operational Plan 2022-2023 agreed with the European Union Agency for Asylum and Bulgaria*, July 2023, available at: <https://bit.ly/3le14fb>.

<sup>138</sup> EUAA, *Operational Plan 2023-2026 agreed with the European Union Agency for Asylum and Bulgaria*, December 2024, available [here](#).

<sup>139</sup> EUAA personnel numbers do not include deployed interpreters by the EUAA in support of asylum and reception activities.

<sup>140</sup> Information provided by the EUAA, 05 March 2026. In the course of 2025, 12 persons were deployed in Bulgaria under two different profiles. These cases are reported separately under each category.

<sup>141</sup> Information provided by the EUAA, 05 March 2026.

<sup>142</sup> Article 58(4) Law on Asylum and Refugees (LAR).

<sup>143</sup> Article 4(5) LAR.

<sup>144</sup> Article 13(1), items 11-12 LAR.

<sup>145</sup> Article 61a(1) in conjunction with Article 68(1) item 1 LAR.

<sup>146</sup> Article 67c(2) LAR.

<sup>147</sup> Article 70(1) LAR.

<sup>148</sup> Article 15 LAR.

<sup>149</sup> Articles 76a to 76c LAR; Article 76d in conjunction with Article 13(2)-(4) LAR.

<sup>150</sup> Law on Asylum and Refugees draft amendments, published for public consultations on 5 January 2024, available in Bulgarian at: <https://bit.ly/3TbGP8m>.

provided by the Commission during the negotiations and implementation<sup>151</sup> of the EC-Bulgaria pilot project on accelerated procedure. Based on the amendment, both admissibility and accelerated procedure's grounds were re-worded and reorganized in the text of the law to fully correspond to the respective provisions of the APD.

**Accelerated procedure:** The accelerated procedure is presently applied based on the decision of the caseworker assigned to the file, if and when there are information or indications to consider the application as manifestly unfounded based on a number of different grounds.<sup>152</sup> A decision should be taken within 14 working days from lodging, otherwise the application has to be examined under the regular procedure. The accelerated procedure is not applicable to unaccompanied children. In the upcoming amendment of the national asylum law<sup>153</sup> following the recommendations from the European Commission both admissibility and accelerated procedure's grounds were re-worded and re-structured to correspond to the respective provisions of the APD.

**Regular procedure:** The regular procedure (titled under the law as a "Procedure for granting of an international protection") requires detailed examination of the asylum application on its merits. A decision should be drafted within 4 months from the lodging of the asylum application and taken within 6 months but this deadline is indicative, not mandatory. The deadline can be extended by 9 additional months with an explicit decision in this respect by the Head of the SAR,<sup>154</sup> but in any case, the SAR must conclude the examination procedure within a maximum time limit of 21 months from the lodging of the application.<sup>155</sup>

**Appeal:** The appeal procedure mirrors the non-mandatory stages of administrative status determination:

- ❖ Dublin / Subsequent application: A non-suspensive appeal must be submitted within 7 days to the Administrative Court of Sofia, which has exclusive competence, in one instance;<sup>156</sup>
- ❖ Accelerated procedure: A suspensive appeal must be submitted within 7 days to the territorially competent Regional Administrative Court, in one instance.
- ❖ Inadmissibility / Regular procedure: A suspensive appeal must be submitted within – respectively - 7 days / 14 days to the territorially competent Regional Administrative Court.

An onward appeal to the Supreme Administrative Court is possible for inadmissibility decisions and negative decisions taken in the regular procedure. In Dublin cases, subsequent applications and decisions taken under the accelerated procedure, only one appeal instance is applicable.

Legal aid can be granted by the court, if requested. All courts in all types of appeal procedures can revoke entirely the appealed administrative decisions and give mandatory instructions as to how the case must be decided at the first instance by the SAR. However, the courts do not have powers to grant protection directly or to sanction the SAR, if their instructions are not observed while reverted asylum applications are re-considered. The courts can only proclaim the re-issued decision as null and void after a new appeal procedure, if it ignores the previous instructions of the court.

**Return decision:** Bulgaria's approach regarding return decisions after rejection of an international protection application is that police authorities are obliged to automatically issue a return order to all irregular third country nationals (hereafter referred to as TCNs) apprehended at the border or inside the country's territory.<sup>157</sup> If the TCN applies for international protection, the implementation of the return order

---

<sup>151</sup> SAR, Annual report on procedures for international protection in 2023, available in Bulgarian at: <https://bit.ly/3lgTCjm>.

<sup>152</sup> Article 70(1) LAR. The 14 applicable grounds are set out in Article 13(1) LAR.

<sup>153</sup> Law on Asylum and Refugees draft amendments, published for public consultations on 5 January 2024, available in Bulgarian at: <https://bit.ly/3TbGP8m>.

<sup>154</sup> The State Agency for Refugees is managed by a chairperson: Article 46 et seq. LAR.

<sup>155</sup> Article 75(5) LAR.

<sup>156</sup> Article 84(4) LAR.

<sup>157</sup> Article 41 LARB.

is suspended until the decision of the asylum authority becomes final.<sup>158</sup> If the asylum applicant is granted a positive decision, the return order is cancelled, and if in case of a negative decision, the return can be implemented immediately.

## B. Access to the procedure and registration

### 1. Access to the territory and push backs

#### Indicators: Access to the Territory

1. Are there any reports (NGO reports, media, testimonies, etc.) of people refused entry at the border and returned without examination of their protection needs?  Yes  No
2. Is there a border monitoring system in place?  Yes  No
3. Who is responsible for border monitoring?  National authorities  NGOs  Other
4. How often is border monitoring carried out?  Frequently  Rarely  Never

No institutional or practical arrangements or measures exist to ensure a differentiated approach to border control that gives access to the territory and protection for those who flee from war or persecution.

#### 1.1 Push backs at land borders

Access of asylum seekers to the territory remained constrained in 2025.

Back in 2018, the government banned access to the 234 km border fence<sup>159</sup> built along the Bulgarian-Turkish border, as well as the possibility to take pictures or filming it by introducing a 300-meters security zone similar to border arrangements during the communist regime.<sup>160</sup> In 2021, the caretaker cabinet<sup>161</sup> transferred the responsibility for the management of the border fence from the district governors to the Ministry of Interior,<sup>162</sup> with repairs by specialised army units realised sporadically, as was the case also in 2024.<sup>163</sup> In 2022, the European Border and Coast Guard Agency (Frontex) launched a Joint Operation Terra with standing corps officers, patrol cars and thermo-vision vehicles. In s at EU's external land borders,<sup>164</sup> taking place across 12 EU Member States, including Bulgaria. In 2025, during the period December 2023 to April 2024, Turkish border guards were present along the whole borderline with Bulgaria, with surveillance equipment installed and physical checks applied to vehicles and travellers on all main and secondary roads to Bulgaria. The cross-border cooperation with the border agencies of Türkiye and Greece also visibly intensified both through the operation of the tri-partite contact centre, opened in 2016 on Bulgarian territory at Kapitan Andreevo BCP,<sup>165</sup> as well as by weekly meetings at regional directorates' level. In 2025, intensified border control measures were applied from the beginning of the year as part of the conditions, agreed by Austria to consent for Bulgaria's full Schengen accession on 1 January 2025. It comprised the deployment of 1,200 national border police officers and 240 Frontex officials in mixed land patrol teams. Additionally, additional 100 officers from various countries, including 40 Romanian, 15 Austrian, 20 Hungarian, and 25 Bulgarian border guards began operation since 3

<sup>158</sup> Article 67 LAR.

<sup>159</sup> Darik News, 'Забраняват заснемането на оградата по границата с Турция', 30 May 2018, available in Bulgarian at: <https://bit.ly/3K8bgFR>.

<sup>160</sup> From 9 September 1944 to 10 November 1989.

<sup>161</sup> dir.bg, 'Назначиха проверка за разрушената ограда на границата с Турция', 20 May 2021, available in Bulgarian at: <https://bit.ly/3FohyO2>.

<sup>162</sup> Darik News, 'МВР поема управлението върху оградата по българо-турската граница', 23 September 2021, available in Bulgarian at: <https://bit.ly/3A8K8Cd>.

<sup>163</sup> Kompassbg.com, 'Спешен ремонт на оградата по границата ни с Турция разпореди Министерският съвет', 7 June 2024, available in Bulgarian [here](#).

<sup>164</sup> FRONTEX, Frontex launches new land operation, 2 April 2022, available at: <https://bit.ly/3Yx2A1W>.

<sup>165</sup> Greek Embassy in Bulgaria, Откриване на граничния Контактен център Гърция – България – Турция, published on 2 December 2016, available in Bulgarian [here](#).

February 2025<sup>166</sup>. The equipment dedicated to border surveillance was also expanded with new echolocation equipment, drones and high passable vehicles.

Irregular migrants apprehended in Bulgaria: 2016-2025										
Apprehension	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Irregular entry	4,600	743	689	489	510	1,386	2,298	1,803	2,543	1744
Irregular exit	4,977	2,413	353	494	924	1,097	2,337	1,990	2,207	781
Irregular stay on the territory	9,267	1,801	1,809	1,201	2,053	8,316	12,092	14,761	4,458	751
Total apprehensions	18,844	4,957	2,851	2,184	3,487	10,799	16,767	18,554	9,208	3,306

Source: Ministry of Interior, Migration Statistics, December 2016: <http://bit.ly/2Fx9h1Y>; December 2017: <http://bit.ly/2ntEXaR>; December 2018: <https://bit.ly/2sBEJ4z>; December 2019: <https://bit.ly/372jvz7>; December 2020: <https://bit.ly/3i01bgF>; December 2021: <https://bit.ly/3fhMfk>, December 2022: <https://bit.ly/3kRy7xE>, December 2023: <https://bit.ly/49u1JVY>, December 2024: <https://bit.ly/49u1JVY>, December 2025: [here](#).

In 2025 the intensified border control measures resulted in 64% overall decrease in the annual number of apprehended newly arrived irregular third country nationals (3306 migrants) in comparison with the previous year (9208 migrants). For seven years since 1 January 2017 the Ministry of Interior stopped to disclose their number in its publicly available statistics. However, starting from January 2024, the Ministry of Interior resumed to publicly report these numbers and did so for the entirety of the year, thus making data available for 2023, 2024 and 2025. In 2025, the authorities reported to have prevented the irregular entry of 13,568 persons.<sup>167</sup> It represented a 74% decrease in comparison with 52,534 persons<sup>168</sup> in 2024 and 240% decrease in comparison with 178,698 persons<sup>169</sup> in 2023. This decrease reflected also in decreased number of alleged pushbacks, monitored and reported through the existing national border monitoring mechanism. Their decrease also started in 2024 with a 75% decrease in the number of pushbacks registered in comparison with 2023<sup>170</sup> (see, [Access to the territory, 1.2. Border monitoring](#)). Data were collected through a regular - weekly and daily - border monitoring, implemented by observers from the Bulgarian Helsinki Committee, a non-governmental organisation whose access to the border was arranged firstly in the 2004 Bi-lateral border monitoring agreement,<sup>171</sup> replaced in 2010 by the Tri-Partite Memorandum of Understanding.<sup>172</sup> In 2025, due to financial constraints the BHC observers monitored just one main geographically designated border areas along the Bulgarian-Turkish border: the green border area starting from Kapikule-Svilengrad-Ormenion border triangle to Hamzabeyli-Lesovo border crossing point (in the area of Svilengrad border police precinct). For these reasons, the Sakar and Strandzha mountain areas, stretching from Elhovo to the Black Sea coast (in the area of Elhovo, Bolyarovo, Sredets, Malko Tarnovo and Rezovo border police precincts) was monitored only on a monthly basis. In 2025, this mechanism<sup>173</sup> registered 3,549 alleged pushbacks affecting 43,284 persons, i.e. no

<sup>166</sup> sega.bg, Полиции от Австрия, Румъния и Унгария застанаха на границата ни с Турция, published on 3 February 2025, available [here](#) in Bulgarian.

<sup>167</sup> MOI statistics, December 2025 Report, Tables on page 2, Migrants who independently returned to the territory of neighbouring countries, published in January 2026, available in Bulgarian at: <https://bit.ly/49x8Dd3>.

<sup>168</sup> MOI statistics, December 2025 Report, Tables on page 2, Migrants who independently returned to the territory of neighbouring countries, published on 16 January 2025, available in Bulgarian at: <https://bit.ly/49x8Dd3>.

<sup>169</sup> Ibid.

<sup>170</sup> See, AIDA, Twelfth Update on Bulgaria, April 2024, page 30.

<sup>171</sup> Bi-lateral Memorandum between National Border Police Service with the Ministry of Interior and Bulgarian Helsinki Committee, signed on 15 December 2004.

<sup>172</sup> Tripartite Memorandum of Understanding (MoU) among Border Police, UNHCR and Bulgarian Helsinki Committee, signed on 14 April 2010.

<sup>173</sup> Tripartite Memorandum of Understanding (MoU) among Border Police, UNHCR and Bulgarian Helsinki Committee, signed on 14 April 2010.

significant change in figures in comparison with the previous year.<sup>174</sup> The Ministry of Interior officially referred to the reported 13,568 persons 'prevented from entering' as 'irregular migrants, who before entering Bulgaria decided themselves to return to the territory of neighbouring countries',<sup>175</sup> i.e. Türkiye. Differently from previous years<sup>176</sup>, the number of cases of 'prevented entries' was much less than those identified under the national monitoring mechanism as pushed back, either from the actual border or from the areas close to the border and already on Bulgarian territory. Reported since 2015,<sup>177</sup> pushback practices such as verbal abuse and physical violence, as well as the humiliating practices of unlawful detention, strip searches and illegal confiscation of footwear, clothing and other belongings, continued to be applied despite the presence of Frontex mixed teams along the land border with Türkiye. In its 2024 report<sup>178</sup>, the Committee for Prevention of Torture (CPT) indicated a clear pattern emerged regarding the treatment reserved by Bulgarian law enforcement officials to migrants who had managed to enter Bulgarian territory from Türkiye through the land border. In such cases, it appeared that individuals or groups had been apprehended and forcibly returned to Türkiye, outside any legally established procedures and without consideration of their individual circumstances or protection needs. The CPT also stated that both apprehension and subsequent forced removal were reported to have often been carried out by using physical violence and unmuzzled service dogs; and that the alleged ill-treatment consisted of slaps, punches including to the face, kicks, and blows with wooden sticks or tree branches, being chased and bitten by service dogs, as well as subjected to threats and/or verbal abuse. The CPT disclosed to have received numerous allegations that migrants had been forced to remove their clothes and shoes with personal belongings, including money and telephones seized before being pushed back to Türkiye.

Out of all 1,774 migrants apprehended at an external border, 1,500 migrants were apprehended at the land border, and 274 new arrivals at border crossing points (BCPs), namely: 250 persons at BCPs at Turkish border, 13 persons at Serbian border, 6 at North Macedonian border, 2 at Airport Sofia and 3 at sea border (Burgas border directorate). At the same time, and against the backdrop of a significantly decreased number of entries, the percentage of irregular migrants officially apprehended at the border with Türkiye for a second consecutive year remained the largest proportion, with 90% of all entry border apprehensions<sup>179</sup> and 54% of all apprehended new arrivals in the country<sup>180</sup>. Since 2014 until 2024, for ten consecutive years these percentages were notably low compared to the number of irregular migrants apprehended on exit borders or inside the territory, as the majority of those trying to enter from Türkiye were pushed back. This increase is attributed<sup>181</sup> to the increased presence of Frontex and other international staff in mixed border patrols along the land borderline with Türkiye. Once officially arrested instead of pushed back, irregular migrants can obtain information on available legal procedures and to apply for international protection as soon as at the 24hrs border police facilities, or after their following transfer to pre-removal (detention) centres in Lyubimets or Busmantsi (see, [Detention of Asylum Seekers](#)).

On 12 December 2024, the EU Council endorsed the full Schengen accession of Bulgaria and Romania from 1 January 2025. After the Schengen accession, the secondary movements slowly, but gradually

---

<sup>174</sup> See, AIDA, Twelfth Update on Bulgaria, April 2025, page 28: 3,548 pushbacks affecting 43,282 persons

<sup>175</sup> MOI statistics, December 2025 Report, Migrants, who independently returned to the territory of neighbouring countries, Tables on page 2, published in January 2026, available in Bulgarian at: <https://bit.ly/49x8Dd3>.

<sup>176</sup> See, AIDA, Twelfth Update on Bulgaria, April 2025, page 28.

<sup>177</sup> See, AIDA, Fourth Update on Bulgaria, 30 September 2015, page 20-21.

<sup>178</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16 - 23 September 2024, published on 6 August 2025, paragraph 38, available at: <https://www.ecoi.net/en/document/2132512.html>

<sup>179</sup> MOI statistics: 1,774 individuals apprehended at entry borders in 2025, of whom 1,600 individuals at the border with Türkiye (2024: 2,543 individuals, of whom 1,803 at the border with Türkiye / 2023: 1,803 individuals, of whom 1,729 at the border with Türkiye), available in Bulgarian at: <https://bit.ly/49x8Dd3>.

<sup>180</sup> Ibid.

<sup>181</sup> Bulgarian Helsinki Committee, Monthly situation report, August 2024.

MOI statistics, December 2025 Report: 2025: July – 63% attempted exits to Serbia (415 migrants) vs. 37% exits to Romania (240 migrants); August – 57% exits to Serbia (478 migrants) vs. 43% to Romania (358 migrants); September – 57% to Serbia (545 migrants) vs. 43% to Romania (405 migrants); October – 54% to Serbia (589 migrants) vs. 46% to Romania (510 migrants); November – 54% to Serbia (647 migrants) vs. 46% to Romania (546 migrants) an December 2025: 53% to Serbia (684 migrants) vs. 47% to Romania (612 migrants).

began to change. Out of all 1,774 new irregular migrant arrivals, 98 migrants were apprehended on entry during the ongoing random border checks, the so-called Schengen compensatory measures, who entered from Greece, and 12 migrants who entered from Romania. It represented a 30% decrease in the number of entries in 2025 compared to the previous year (2024: 2,539 new arrivals at entry borders). At the same time, 1,441 migrants were apprehended while attempting to exit Bulgaria's territory, out of whom 84 migrants at border crossing points (BCPs), 699 migrants at land borders and an almost equal number of 655 migrants after random border checks under the Schengen compensatory measures along the internal EU border on exit to Romania (612 migrants) and on exit to Greece (43 migrants). Out of all the 1,441 migrants apprehended by Bulgarian border police while trying to exit or taken back to Bulgaria by the border guards of the neighbouring countries, 54% (781 migrants) were new arrivals, which marked a 55% decrease on exit compared to the same period of the previous year (2024: 3,167 migrants, of whom 2,195 new arrivals). The attempted exits to or readmissions back to Bulgaria from Romania - a total of 608 migrants -, continued to rise gradually, even if by December 2025 they remained 11% lower than the numbers of those exiting to Serbia.<sup>182</sup> This means that the national exit routes of the smuggling and trafficking channels are gradually, but constantly shifting from Serbia towards Romania. Among the remaining 751 migrants apprehended in the country's territory far from any border, the main countries of origin were Afghanistan (32%), Morocco (28%), Iraq (14%) and Syria (13%).

The changes in the political situation in Syria at the end of 2024, and mass deportations of Afghan nationals from Iran in the summer of 2025 – these representing the nationalities that have been the two top arrivals to Bulgaria over the last decade -, also led to a decrease in 2025 of the border pressure and the number of prevented irregular entries. The overall decrease of new arrivals from Türkiye in 2025 was reflected also in terms of the number of individuals accessing the national asylum system. There was a 68% drop in registered asylum applications, with just 3,895 applicants in 2025 compared to 12,250 in 2024; and 83% decrease compared to 22,518 applicants in 2023. Out of 1,774 migrants apprehended at an entry border in 2025 (2024: 2,543 migrants), only 1.7% (i.e. 28 entry border applicants) applied and had direct access to the asylum procedure without being detained. These numbers remained similar to those registered in 2024, when 0.2% (i.e. 27 individuals) had direct access to the asylum procedure without being detained. Out of the border applicants who had direct access to asylum procedure without detention, 39% (11 border applicants) were unaccompanied children who avoided detention as they were referred to social services by the Border police under the referral arrangements introduced in 2018.<sup>183</sup> Out of them, 8 unaccompanied children were apprehended and referred by the Border Police, while 3 unaccompanied children were apprehended and referred by the Migration police after being apprehended within the country's territory. The remaining 1746 migrants, apprehended at entry border together with 781 migrants apprehended at exit borders and 751 migrants apprehended in the territory of the country were sent to the pre-removal (detention) centres. Out of them, 87% (2,860 migrants) applied for asylum after their detention in pre-removal centres. This left 15% of all asylum applications (589 applicants) being submitted by the so called 'self-reported' third-country nationals, who are irregular migrants able to enter and reach asylum registration-and-reception centres without been detected or apprehended by any of the police authorities.

## 1.2 Border monitoring

Under the 2010 tripartite Memorandum of Understanding between the Border Police, UNHCR and the Bulgarian Helsinki Committee (BHC),<sup>184</sup> with funding provided by UNHCR, all three parties have access to any national border or detention facility at land and air borders, including airport transit zones, without limitations on the number of monitoring visits. Access to these facilities is unannounced and granted without prior permission or conditions on time, frequency or circumstances of the persons detained. In

---

<sup>182</sup> MOI statistics, December 2025 Report: 2025: July – 63% attempted exits to Serbia (415 migrants) vs. 37% exits to Romania (240 migrants); August – 57% exits to Serbia (478 migrants) vs. 43% to Romania (358 migrants); September – 57% to Serbia (545 migrants) vs. 43% to Romania (405 migrants); October – 54% to Serbia (589 migrants) vs. 46% to Romania (510 migrants); November – 54% to Serbia (647 migrants) vs. 46% to Romania (546 migrants) an December 2025: 53% to Serbia (684 migrants) vs. 47% to Romania (612 migrants).

<sup>183</sup> Article 63k-63l LARB Regulations.

<sup>184</sup> The Bulgarian Helsinki Committee had a bilateral agreement with the Border Police from 2004 to 2010.

2025, due to financial constraints the BHC observers monitored just one main geographically designated border areas along the Bulgarian-Turkish border: the green border area starting from Kapikule-Svilengrad-Ormenion border triangle to Hamzabeyli-Lesovo border crossing point (in the area of Svilengrad border police precinct). For these reasons the Sakar and Strandzha mountain areas, stretching from Elhovo to the Black Sea coast (in the area of Elhovo, Bolyarovo, Sredets, Malko Tarnovo and Rezovo border police precincts) was monitored only on a monthly basis. The BHC lawyers can interview the detainees and check the border registers. Monthly reports are prepared and shared internally. On this basis, the parties prepare and publish an annual border monitoring report.<sup>185</sup>

In 2025, the Bulgarian Helsinki Committee under its UNHCR-funded project carried out regular border monitoring visits on a weekly (or daily, depending on the situation) basis, at the border with Greece and Türkiye, as well as ad hoc visits at the Sofia Airport transit hall. During these visits, the Bulgarian Helsinki Committee can also obtain information from police records when needed to cross-check individual statements, but has access only to border detention facilities, not to border-crossing points *per se*.

### 1.3 Legal access to the territory

National legislation and arrangements in principle do not envisage humanitarian visas or humanitarian reasons as legal grounds for permitting entry to or the right to stay in the country's territory.<sup>186</sup> There are several exclusions in the law, when humanitarian reasons can be taken into account during the visa procedure, but all of them relate to a reduction of the requirements to submit some of the documents, supporting the visa application or proving the grounds for its granting. The law allows the visa application on humanitarian or emergency grounds to be submitted outside the country of origin of the visa applicant.<sup>187</sup> The visa application can also be submitted on humanitarian or emergency grounds at the border crossing points (BCPs).<sup>188</sup> However, in these cases the border police can issue only transit visas with a 3-days validity, or a short-term visa stay with a 15-days validity.

In 2022, no new relocations were implemented mainly due to mass arrivals from Ukraine. In 2023, 94 Syrians were relocated from Cyprus, while 76 applicants from Greece and 10 from Italy. In 2024, another 7 Syrian nationals were relocated from Cyprus. No new relocations were carried out in 2025.<sup>189</sup> Thus, the number of relocated persons reached a total of 250, including 70 evacuees from Afghanistan. The countries of origin varied from Syria and Afghanistan to Iraq, Eritrea, Pakistan, Egypt, while some of the relocated persons were stateless. Out of all the relocated persons, except those relocated from Afghanistan, 78 individuals have been recognised as refugees so far, 108 individuals have been granted subsidiary protection ("humanitarian status"), 2 individuals were rejected, 1 individual accepted a voluntary return to his country of origin, 1 procedure was terminated, and 14 procedures are still pending<sup>190</sup>. Regarding resettlement, the government decided to resettle 110 Syrians from Türkiye on 29 March 2017, based on the arrangements outlined in the 2016 EU-Türkiye deal.<sup>191</sup> Up until 31 December 2025, Bulgaria resettled a total of 133 Syrian nationals from Türkiye. All of them were granted international protection.<sup>192</sup>

There is no official list of criteria applied in relocation or resettlement procedures in Bulgaria, but families with children are prioritized as a matter of practice. The SAR does not conduct security interviews with relocation candidates on site in Italy or Greece, but these are conducted with resettlement candidates in Türkiye. The SAR liaison officer examines the relevant files together with the Italian and Greek authorities. A document check of the relocated and resettled persons is performed by the State Agency for National Security (SANS) in Bulgaria and Türkiye, after which clearance is given for the relocation or resettlement to be carried out.

---

<sup>185</sup> The border monitoring reports are available at: <https://bit.ly/3mjDhNz>.

<sup>186</sup> Article 5 Ordinance for Rules and Criteria for Visa Issuing and Visa Regime.

<sup>187</sup> Article 11 (6) Ordinance for Rules and Criteria for Visa Issuing and Visa Regime.

<sup>188</sup> Article 10 (2) Ordinance for Rules and Criteria for Visa Issuing and Visa Regime.

<sup>189</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>190</sup> Ibid.

<sup>191</sup> Council of Ministers, Decision №750 from 30 November 2017.

<sup>192</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

All relocated and resettled persons are being admitted directly to a regular procedure. All of them are accommodated in the refugee reception centre (RRC) in Sofia, **Vrazhdebna** shelter, which is considered as a model reception centre with material conditions above the minimum standards. Food, health care, initial orientation and social mediation is provided on site. However, no one receives monthly payment or other financial allowance nor pocket money, which is the treatment of all asylum seekers in Bulgaria since the abolition of the social financial assistance in February 2015 (see section on [Forms and Levels of Material Reception Conditions](#)).

## 2. Preliminary checks of third country nationals upon arrival

### Indicators: Preliminary checks at the arrival point

1. Are there any checks that are applied systematically or regularly at the point of entry when a person enters the territory?  Yes  No
2. Is the person considered under law to have entered the territory during these checks?  Yes  No

Under the law,<sup>193</sup> the SAR must inform the State Agency for National Security (SANS - Държавна агенция “Национална сигурност”) of the registration of every asylum application. The SANS then conducts security assessments based on interviews with applicants, which are often held as soon as they are arrested by police, border and immigration officers (see, [3. Registration of the asylum application](#)).

In 2020, amendments to the law introduced a mandatory vulnerability assessment implemented by the SAR social experts with their vulnerability reports and recommendations referred to the case workers in order these circumstances to be taken into account in the decision-taking process. The SAR internal rules foresee that these two documents have to be added to the personal file to enable case worker to take them into account when examining the application. These activities have to be implemented also in the cases when the vulnerability or the special needs are established at a later stage of the asylum procedure. Additionally, an early identification questionnaire was created for applicants who experienced traumatising experiences in order to determine their special needs and to facilitate the referral to adequate psychological or medical care<sup>194</sup> (see, [1.1. Screening of Vulnerability](#)).

## 3. Registration of the asylum application

### Indicators: Registration

1. Are specific time limits laid down in law for making an application?  Yes  No  
❖ If so, what is the time limit for lodging an application?
2. Are specific time limits laid down in law for lodging an application?  Yes  No  
❖ If so, what is the time limit for lodging an application?
3. Are registration and lodging distinct stages in the law or in practice?  Yes  No
4. Is the authority with which the application is lodged also the authority responsible for its examination?  Yes  No
5. Can an application be lodged at embassies, consulates or other external representations?  Yes  No

An asylum application can be made either before the specialised asylum administration, the SAR, or before any other state authority, which will be obliged to refer it immediately to the SAR.<sup>195</sup> Thus, asylum

<sup>193</sup> Article 58 (10) LAR.

<sup>194</sup> Early Identification and Needs Assessment form (ФИОН), Individual Support and Referral Plan form (ФИПП) and Social Consultation form (ФСК).

<sup>195</sup> Article 58(4) LAR.

can be requested on the territory, at the borders before the Border Police staff, or in detention centres before the Migration Directorate staff of the Ministry of Interior. The asylum application should be made within a reasonable time after entering the country, except in cases of irregular entry or residence, when it ought to be made immediately after the irregular entry or upon expiration of the valid residence permit.<sup>196</sup> Failure to make an application within a reasonable time or immediately in those cases can be a ground for rejecting it as manifestly unfounded under the [Accelerated Procedure](#).<sup>197</sup>

If the asylum application is made before an authority different than the SAR, then status determination procedures cannot legally start until the asylum seeker is transferred from the border / detention centre and accommodated in any of the SAR's premises for registration to lodge the claim in person.<sup>198</sup> Under the law, this personal registration is to be implemented in any of the territorial units (see [Types of Accommodation](#)) of the SAR and within 3 working days after the making of the asylum application. Exceptions to this deadline are allowed only in cases where the asylum application is lodged before a different government authority or institution, in which case the deadline is set at 6 working days.<sup>199</sup>

No significant delays were noted with respect to the release and registration of asylum seekers who applied while in immigration detention centres. In 2025, the average duration of detention was of 5 calendar / 3 working days, within the statutory time-limit.<sup>200</sup> For comparison, in 2024 the average detention duration was of 6 calendar / 4 working days. Registration took place without any delay compared to the established EU minimum standard.<sup>201</sup>

An important improvement, firstly monitored in 2022<sup>202</sup> was maintained in 2025. It relates to the access to procedure of the so called 'self-reported asylum seekers', i.e. those who managed to enter and travel in Bulgaria undetected by the police to turn up on their own directly at a SAR reception centre (Sofia, Banya, Harmanli or Pastrogor) and seek protection. Since 2016 the SAR has been refusing to register the self-reported asylum seekers, instead it has been alerting the local police departments. As a result, the asylum seekers subjected to this practice have been arrested and detained in MOI pre-removal centres. For example, in 2021 this affected 196 newly arrived asylum seekers, among whom families with minor children and pregnant women. Since 2022, the practice was implemented in a more limited number of instances,<sup>203</sup> as was the case also in 2025,<sup>204</sup> when it affected 4 out of 3,895 persons (0.1%) who had lodged an asylum application.<sup>205</sup> The cases in which SAR refused to register self-reported asylum seekers were reported regarding the reception centres in Ovcha Kupel (Sofia) and Vrazhdebna (Sofia).

Another improvement made in 2022 and maintained until 2025 including relates to registrations and status determinations carried out - in violation of the law - by SAR in MOI immigration detention centres. Under existing legal provisions,<sup>206</sup> while SAR can in fact detain asylum seekers pending the asylum procedure, it has the power to do so only in closed SAR reception centres. Since 2015, SAR began to carry out registrations and asylum procedures in MOI immigration detention centres instead. In 2023, SAR reduced to a minimum this unlawful practice, carrying out only 1 procedure in a MOI immigration detention centre in Lyubimets, in 2024 no such procedures were carried out. In 2025 it was again applied, but only in 1 case.<sup>207</sup>

---

<sup>196</sup> Article 4(5) LAR.

<sup>197</sup> Article 13(1), items 11-12 LAR.

<sup>198</sup> Article 61a(1) LAR.

<sup>199</sup> Article 61a(1) LAR in conjunction with Article 58(4) LAR.

<sup>200</sup> Article 6(1) recast Asylum Procedures Directive.

<sup>201</sup> Article 6(1) recast Asylum Procedures Directive.

<sup>202</sup> Bulgarian Helsinki Committee, 2022 Annual RSD Monitoring Report, published on 1 March 2023, available at: <https://bit.ly/3Jkd3t0>.

<sup>203</sup> Ibid.

<sup>204</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3OTqvGv>.

<sup>205</sup> Ibid.

<sup>206</sup> Article 45(b) etc. LAR.

<sup>207</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

At the end of the process, the asylum seeker receives a registration card (регистрационна карта) in paper format. It should be noted, however, that the registration card is not issued to subsequent applicants.<sup>208</sup>

Under the law,<sup>209</sup> the SAR must inform the State Agency for National Security (SANS - Държавна агенция “Национална сигурност”) of the registration of every asylum application. The SANS then conducts security assessments based on interviews with applicants, which are often held as soon as they are arrested by police, border and immigration officers. In practice, the SAR follows these assessments without conducting further investigations and rejects applications accordingly, even when the information is classified. National courts notoriously refuse to check or verify the facts raised by the SANS as security concerns in individual cases. As a result, in the past the European Court on Human Rights (ECtHR) repeatedly ruled that Bulgaria has been regularly violating the right to an effective remedy.<sup>210</sup> In 2023, a decision<sup>211</sup> of the Supreme Administrative Court referring to CJEU jurisprudence (*Országos Idegenrendészeti Főigazgatóság and Others*, C-159/21, 22 September 2022) upheld that the result of the SANS written opinion considering a certain person a threat to national security should not be mandatorily taken into account in SAR decisions. The court found that the asylum agency not only had the jurisdiction but also the obligation to assess whether the evidence for it was sufficient and satisfactory, and that SAR cannot automatically uphold the SANS opinion, and exclude asylum-seekers from international protection only on this basis.

## C. Procedures

### 1. Regular procedure

#### 1.1 General (scope, time limits)

##### Indicators: Regular Procedure: General

- |   |   |
|---|---|
| 1. Time limit set in law for the determining authority to make a decision on the asylum application at first instance:    | 6 months  |
| 2. Are detailed reasons for the rejection at first instance of an asylum application shared with the applicant in writing | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Backlog of pending cases at first instance of 31 December 2025:  | 1,632   |
| 4. Average length of the first instance procedure in 2025   | 3 to 6 months   |

The LAR sets a 6-month time limit for deciding on an asylum application admitted to the regular procedure.<sup>212</sup> The LAR requires that, within 4 months of the beginning of the procedure,<sup>213</sup> caseworkers draft a proposal for a decision on the asylum application concerned. The asylum application should firstly be assessed on its eligibility for refugee status. If the answer is negative, the need for subsidiary protection on the account of a general risk to the applicant’s human rights should also be considered and decided upon. The interviewer’s position is reported to the decision-maker, who has another 2 months for consideration and decision. If evidence is insufficient for taking a decision within 6 months, the law allows

<sup>208</sup> Article 76c(3) LAR.

<sup>209</sup> Article 58 (10) LAR.

<sup>210</sup> ECtHR, *Al-Nashif and other v. Bulgaria*, Case N50963/99, 20 September 2002; *Musa and other v. Bulgaria*, Case N61259/00, 11 January 2007; *Hassan v. Bulgaria*, Case 54323/00, 14 June 2007; *Bashir and other v. Bulgaria*, Case N65028/01, 14 June 2007; *C.G. and other v. Bulgaria*, Case N1365/07, 24 April 2008.; *Raza v. Bulgaria*, Case N31465/2008, 11 February 2010; *Kaushal and other v. Bulgaria*, Case N1537/08, September 2010; *GC and other v. Bulgaria*, Case N1365/07, 24 June 2008; *O.D. v. Bulgaria*, Case N34016/18, 10 October 2019; *M.A. and other v. Bulgaria*, Case N5115/18, 20 June 2020.

<sup>211</sup> Supreme administrative court, Decision №11467 from 22 November 2023, available in Bulgarian at: <https://bit.ly/3T9EZER>.

<sup>212</sup> Article 75 (1) LAR.

<sup>213</sup> Article 74 LAR.

for the deadline to be extended for another 9 months, but it requires the whole procedure to be limited to a maximum duration of 21 months. Determination deadlines are not mandatory, but only indicative. Therefore, even if these deadlines are exceeded, this does not affect the validity of the decision.

In 2025, according to the available independent reports<sup>214</sup> the general 6 months deadline for issuing an asylum decision was observed in 99% of the cases.<sup>215</sup> According to the SAR, the average duration of asylum procedures on the merit ranges from 3 to 6 months<sup>216</sup>.

In 2025, the number of new arrivals decreased to a total of 3,895 (-68%) in comparison with 12,250 in 2024 (-45%); 22,518 asylum seekers in 2023 (+10%); 20,407 asylum seekers in 2022 (+85%); 10,999 asylum seekers (+212% increase) in 2021 and 3,525 asylum seekers in 2020.

In 2025, SAR issued 7,090 decisions in total. Out of these, 62 were decisions granting refugee status, 897 decisions granting humanitarian status (i.e. subsidiary protection under the QD), 3,703 rejections and 2,428 decisions discontinuing the procedure, mainly due to absconding.<sup>217</sup> Despite this, at the end of 2025 1,632 asylum cases were still pending.<sup>218</sup> SAR staff competent to issue eligibility decisions counted 29 case-workers,<sup>219</sup> of whom 26 case-workers with competence to issue decisions on the substance of the asylum application and 3 case-workers with competence to issue decisions in Dublin procedure.

45% (2,428 persons) of the 5,527 asylum seekers with pending applications in 2025<sup>220</sup> abandoned their procedures in Bulgaria. This represented an increase (+16%) compared to the 30% (7,299) in 2024. The usual reasons motivating asylum seekers to abandon the asylum procedure in Bulgaria and abscond were the low recognition rate for certain nationalities, poor reception conditions, lack of integration opportunities, but most importantly their plans to reach other EU countries as a final destination from the onset of their migratory journey. While in 2022 the Afghan applicants for the first time in a decade enjoyed a significantly higher recognition rate than in previous years, with 49% overall recognition (14% refugee recognition / 35% subsidiary protection rate), in the following years recognition rates lowered once again, reaching 4% (0.3% refugee recognition / 3.7% subsidiary protection) in 2025, with the rejection rate standing at 96%. This likely motivated 78%<sup>221</sup> of them, much more than (32%) in 2024 and (68%) in 2023, though still less than 2022 (95%),<sup>222</sup> to abscond before their first instance decision, issued on the merits in 22%<sup>223</sup> of the caseload.

Out of the 7, 090 decisions taken, 34% of asylum procedures were terminated (discontinued) *in absentia*:

First instance SAR decisions on asylum applications: 2025		
In-merit decisions		
Refugee status	62	4,662
Subsidiary protection	897	
Unfounded	2,137	
Manifestly unfounded	1,566	
Abandoned applications		
Terminated	2,428	
<b>Total</b>		<b>7,090</b>

<sup>214</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

<sup>215</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

<sup>216</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>217</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>218</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>219</sup> SAR, reg. №АД-07-7 from 14 January 2025: in total 5,527 cases pending determination, of which 3,895 new applications and 1,632 applications cases pending from 2024.

<sup>220</sup> Ibid.

<sup>221</sup> SAR, reg. No. №РД05-31 from 15 January 2024: 1,969 discontinued procedures out of all 6,159 Afghan applicants pending in 2023, of whom 1,980 applied in 2024 and 4,179 were pending from 2023.

<sup>222</sup> See, AIDA 2023 and 2022 Updates on Bulgaria.

<sup>223</sup> See, Table Statistics, pages 12-13 of this report: 327 Afghan decisions on the merits.

Source: SAR.

## 1.2 Prioritised examination and fast-track processing

Prioritised examination is applied neither in law nor in practice in Bulgaria, although a specific procedure is applied with respect to [Subsequent Applications](#).

## 1.3 Personal interview

### Indicators: Regular Procedure: Personal Interview

1. Is a personal interview of the asylum seeker in most cases conducted in practice in the regular procedure?  
 Yes  No  
❖ If so, are interpreters available in practice, for interviews?  Yes  No
2. In the regular procedure, is the interview conducted by the authority responsible for taking the decision?  Yes  No
3. Are interviews conducted through video conferencing?  Frequently  Rarely  Never
4. Can the asylum seeker request the interviewer and interpreter to be of a specific gender?  
 Yes  No  
❖ If so, is this applied in practice during interviews?  Yes  No

After registration is completed, a date for an interview is set. The law requires that asylum seekers whose applications were admitted to the regular procedure be interviewed at least once regarding the facts and circumstances of their applications.<sup>224</sup> The law requires that the applicant be notified in due time of the date of any subsequent interviews. If the interview is omitted, decisions cannot be considered in accordance with the law, unless it concerns a medically established case of insanity or other mental disorder.<sup>225</sup> In practice, all asylum seekers are interviewed at least once to determine their eligibility for refugee or subsidiary protection (“humanitarian status”). Further interviews are usually only conducted if there are contradictions in the statements or if some facts need to be clarified.<sup>226</sup> In 2020, amendments to the LAR extended the opportunity to gather expert opinions, including on age, gender, medical, religious, and cultural issues as well as such specific to children.<sup>227</sup> The law also introduced instructions on COI sources and information gathering.<sup>228</sup>

The SAR uses the standard set of questions used during eligibility interviews and relied entirely on caseworkers’ decision regarding whether to ask open questions. However, such type of questions are rarely, if ever, asked during the interview. The standardized interview form is applied to all, including unaccompanied children, without any adaptation or account to children’s level of maturity. This has resulted in a poor quality of examination of asylum claims (i.e. little investigation of the individuals’ statements and refugee stories). At the beginning of 2023, the new SAR management introduced an interview set of questions adapted for asylum seeking children, including unaccompanied ones.<sup>229</sup> In 2025, these adapted questions were used in practice only in 37% cases<sup>230</sup> of interviewed children, while the interviews with the rest 63% of them were conducted using questions prepared for adult applicants. The monitoring demonstrated<sup>231</sup> that in the majority of the cases the use of interviewing template was counterproductive, as caseworkers not only limited the investigation of the case to the pre-set list of questions, but also did not in general provided applicants an opportunity to present their accounts freely

<sup>224</sup> Article 63a (3) LAR.

<sup>225</sup> Article 63a (7) LAR in conjunction with Article 61a (5) LAR.

<sup>226</sup> Article 63a (5) LAR.

<sup>227</sup> Article 61a (2)-(4) and (6) LAR.

<sup>228</sup> Article 63(3) LAR.

<sup>229</sup> SAR, reg. №ПД05-40 from 16 January 2023.

<sup>230</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

<sup>231</sup> Ibid.

and without interruptions. In its reply<sup>232</sup> to the findings of this report, the SAR indicated that in 2025 a new interview questionnaire was developed by SAR in cooperation with EUAA, which included open-type questions that encourage the applicants to tell their story in a detailed narrative. All caseworkers of SAR have undergone a training on the use of the new questionnaire before its official implementation in September 2025. In addition, as a part of the activities planned within the Operational plan of EUAA with SAR, the SAR indicated that an EUAA senior expert/team leader provided peer-to-peer support on the new asylum interview template and shadowed a number of interviews with each and every caseworker in order to guide them on how to implement it properly and efficiently.

There are no guidelines or a code of conduct for asylum caseworkers to elaborate on the methodology for conducting interviews specifically. Similarly, there are currently no age or gender-sensitive mechanisms in place in relation to the conduct of interviews, except for the asylum seekers' right to ask for an interpreter of the same gender.<sup>233</sup> In 2025,<sup>234</sup> considering all the cases in which the case-worker and the asylum seeker were of different gender, in 17% (13% in 2024) the asylum seeker was informed about the possibility to request that the interview be conducted by an interviewer of the same gender, and in 13% (45% in 2024) about the possibility to request an interpreter of the same gender. These percentages are far from the required standard of all asylum seekers being informed that they can request an interviewer and interpreted from the same gender.

### 1.3.1. Interpretation

The presence of an interpreter ensuring interpretation into a language that the asylum seeker understands is mandatory according to the LAR. The law provides for a gender-sensitive approach as interviews can be conducted by an interviewer and interpreter of the same sex as the asylum seeker interviewed upon request.<sup>235</sup> In practice, all asylum seekers are asked explicitly whether they would like to have an interviewer or interpreter of the same sex in the beginning of each interview, although cases when this obligation is omitted by the caseworker still occur in many cases (see above 1.3. Personal interview).

In 2025,<sup>236</sup> considering all the cases in which the interpreter and the asylum seeker were of different gender, in 13% (45% in 2024) the asylum seeker was informed about the possibility to request an interpreter of the same gender, where in the remaining 87% (55% in 2024) of the cases this information was not provided. As a result, in 63% of the cases where the SAR failed to provide this required information, the female applicants were interviewed with the assistance of male interpreters.<sup>237</sup>

For many years since 2014, the low fees paid for interpretation by the asylum agency SAR remained one of main reasons for the lack of proper interpretation during the eligibility interviews at first instance. In 2023, the SAR attempted to solve this problem by using shared interpretation services with the Ministry of Foreign Affairs.<sup>238</sup> However, this approach proved inadequate due to significant delays in interpreters' appointment in asylum procedures due to their workload and other MFA related commitments.<sup>239</sup> Following the beginning of EC-Bulgaria pilot project on accelerated procedure in mid-2023,<sup>240</sup> the Commission deployed additional interpreters to be used by SAR through the duration of the project. This support for interpretation was extended only until the end of 2024 under the EUAA and Bulgaria operational plan, signed in July 2023,<sup>241</sup> while the plan in itself was later amended and extended in

---

<sup>232</sup> SAR, reg. № КП-04-2611 from 5 May 2026.

<sup>233</sup> Article 63a (6) LAR.

<sup>234</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

<sup>235</sup> Article 63a(6) LAR.

<sup>236</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

<sup>237</sup> Ibid.

<sup>238</sup> SAR, reg. No. №ПД05-31 from 15 January 2024.

<sup>239</sup> 126<sup>th</sup> Coordination Meeting, held on 5 October 2023.

<sup>240</sup> See, AIDA 2023 Update on Bulgaria.

<sup>241</sup> EUAA, Operational Plan 2022-2023 agreed with the European Union Agency for Asylum and Bulgaria, July 2023, available at: <https://bit.ly/3le14fb>.

December 2024 until the end of 2026.<sup>242</sup> Thus, in 2025, the SAR continued to be supported by the EUAA in securing the interpretation in asylum procedures at the first instance. However, this support exhibited certain problems mainly related to the EUAA selection of interpreters being applied without any specific requirements other than proficiency in the language in question. According to the Bulgarian Helsinki Committee's evaluation, most of them were not properly instructed on national asylum procedures or appropriate and impartial behaviour. In several anecdotal cases in 2023<sup>243</sup> and 2024<sup>244</sup> asylum seekers hosted in the Pastrogor Transit Centre and Sofia reception centre complained that their assigned interpreters had been either providing misleading information or making inappropriate or abusive comments after the end of the interview. Following the submission of formal complaints to SAR, and subsequent communication to EUAA the contracts of the interpreters in question were terminated.<sup>245</sup> Similar reports were not submitted in the course of 2025. It should be noted that inadequate interpretation or delivery of wrong or misleading information is contrary to the main function of interpretation services in status determination procedure, where in worst cases it could result in failure to appeal on time negative first instance decisions.

Interpretation is provided mainly from English, French, Russian, Farsi, Dari, Pashto, Urdu and Arabic languages. Interpreters from other key languages such as Kurdish (Sorani or Pehlewani), Tamil, Ethiopian and Swahili are scarce and largely unavailable. In such cases, as well as in cases when an interpreter from the spoken language is available in another reception centre, the asylum administration organises videoconference interpretation. Communication interruptions and other technical problems are the most common obstacles during interpretation via videoconference. It often creates an environment which does not allow the applicant to present properly his accounts in a detailed and systematic way, thus preventing the case worker from clarifying the relevant facts and circumstances for the decision-making process.

100% of the monitored court hearings were assisted by interpreters in 2025.<sup>246</sup> In appeal proceedings before the national courts, in 90% of the monitored cases where the applicant attended the hearing the interpreter was present and assisting the appellant, and in 35% of these cases (55% in 2024) the court conducted documental verification of interpreters' qualifications.<sup>247</sup>

The lack of adequate budget for interpretation also affects the translation of written evidence, in cases where written evidence is submitted by applicants. In view of making savings and accelerating the procedure, caseworkers are told to advise the applicants to pay for translation fees of their documents themselves so as to be taken into consideration during the status determination or to accelerate the decision-making process.

### 1.1.1. Recording and report

The law provides for mandatory audio or audio-video tape-recording of all eligibility interviews as the best safeguard against corruption and for unbiased claim assessment.<sup>248</sup> This positive practice, instated from 2021, continued in the following years, as 100% of the monitored interviews were tape-recorded. This being said, the benefits of such a procedure are hindered by the fact that, in practice, caseworkers take a decision based on their own notes rather than the actual audio recording.

Videoconference interpretation during registration and eligibility interviews is also used, usually in **Pastrogor, Harmanli** and **Banya** (the reception centres outside the capital **Sofia**), where interpreters are harder to find and employ, in which case interviews are conducted with the assistance of the interpreters

---

<sup>242</sup> EUAA, Operational Plan 2024-2026 agreed with the European Union Agency for Asylum and Bulgaria, as amended in December 2024, available [here](#).

<sup>243</sup> Bulgarian Helsinki Committee, 2023 Annual Report on Human Rights, available in Bulgarian at: <https://bit.ly/3SX3ST7>.

<sup>244</sup> Bulgarian Helsinki Committee, reg. №Б-29 from 2 October 2024.

<sup>245</sup> SAR, reg. №ЛЙ-16-446-3 from 28.06.2024.

<sup>246</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

<sup>247</sup> Ibid.

<sup>248</sup> Article 63a(3) LAR.

who work in **Ovcha Kupel**, **Vrazhdebna** and **Voenna Rampa**, the reception centres and shelters in Sofia. This type of interpretation creates additional difficulties for the applicants, as video communication significantly delays the process of statements' collecting.

All interviews are conducted by staff members of the SAR, whose competences include interviewing, case assessment and preparing a draft decision on the claim. In practice, almost all interviews continue to be recorded also in writing by interviewers by summarising and typing questions / answers in the official protocol. A report of the interview is prepared and it shall be read to, and then signed by the applicant, the interpreter and by the caseworker.

Compliance with EU standards<sup>249</sup> in this respect is of paramount importance considering that, under such circumstances, the information recorded in the report of the interview could be prone to potential manipulation, and the applicant would require a phonetic expertise requested in eventual appeal proceedings to validly contest the content of the report in case of inaccuracies. Court expertise expenses in asylum cases have instead to be met by the appellants.<sup>250</sup>

Notwithstanding the small number of asylum seekers who presented any evidence to support their claims, in a small percentage of cases, caseworkers continued to omit at some instances their obligation to collect these pieces of evidence with a separate protocol, a copy of which should be served to the applicant. In 47% of monitored cases (98% in 2024),<sup>251</sup> asylum seekers were informed about their obligation to submit all the available evidence to support their statements. In the remaining 53% of monitored cases this was not done. In 32% of monitored cases, asylum seekers submitted evidence in support of their asylum claim; however, in none of them the evidence was properly protocolled. Hence, the important safeguard that the submitted evidence would be taken into consideration in the decision-making was not observed in 100% of the monitored cases, where applicants submitted evidence. This marked a regress when compared to 2023, when this omission was made in 38% of the cases (45% in 2024; 38% in 2023; 51% in 2022; 16% in 2021 and 12% in 2020).

## 1.4 Appeal

### Indicators: Regular Procedure: Appeal

1. Does the law provide for an appeal against the first instance decision in the regular procedure?
 

❖ If yes, is it	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
❖ If yes, is it suspensive	<input checked="" type="checkbox"/> Judicial	<input type="checkbox"/> Administrative
	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> Some grounds <input type="checkbox"/> No
2. Average processing time for the appeal body to make a decision: Up to 3 months

A negative decision taken in the regular procedure on the merits of the asylum application can be appealed within 14 days from its notification. In general, this time limit has proven sufficient for rejected asylum seekers to get legal advice, prepare and submit the appeal within the deadline. The SAR has to provide information - in the form of a list - to rejected asylum seekers as to where and how they can receive legal aid when serving a negative decision, an obligation that is respected in practice (see [Regular Procedure: Legal Assistance](#)).

Two levels of appeal are accessible in the regular procedure,<sup>252</sup> in contrast to appeal procedures for contesting decisions taken in [Dublin: Appeal](#), [Accelerated Procedure: Appeal](#) and inadmissibility of [Subsequent Applications](#) procedures, where first instance decisions are reviewed in only one court appeal instance.<sup>253</sup>

<sup>249</sup> See Court of Justice of the European Union (CJEU), Case C-348/16 Sacko, Judgment of 26 July 2017, para 35; Case C-249/13 Boudjlida, Judgment of 11 December 2014, para 37; Case C-166/13 Mukarubega, Judgment of 5 November 2014, para 47.

<sup>250</sup> Article 92 LAR.

<sup>251</sup> Bulgarian Helsinki Committee, 2024 Annual Report on Human Rights, available in Bulgarian at: <https://bit.ly/3SX3ST7>.

<sup>252</sup> Article 85(4) LAR

<sup>253</sup> Article 85(3) LAR in conjunction with Article 84(1)-(2) LAR.

Under Article 12 of Administrative Procedure Code asylum decisions, as other formal administrative decisions, are to be issued in Bulgarian language only. This obligates the administration to provide oral interpretation when the applicant does not speak Bulgarian. Therefore, the SAR does not translate its asylum decisions, but instead sends a summon to asylum seekers, when their decisions are ready, to come to the SAR reception centre, where their procedure was conducted in order to be served the decision with the assistance of an interpreter. The interpreter reads the decision aloud to the asylum seekers and signs the documents to verify it. In practice, the SAR organizes the serving of their first instance decisions on the date, when it is expected that the respective asylum seeker will appear in the SAR centre for some other administrative service, e.g. renewal of the temporary asylum card, which has 3 months of validity. In cases when the decision is not served within 14 days from the date of its formal issue by the SAR, the asylum agency is obligated by the law<sup>254</sup> to send a notification by post to the asylum seeker that the decision is ready. These notifications should be bilingual and should be sent only to asylum seekers who are not accommodated at SAR reception centres but live outside at the so called 'external domiciles' or 'external address'. In such cases, when asylum seekers have been posted a notification to go to SAR to be served a decision but failed to appear in 7 days after receiving the notification by post, their decision can be considered served and becomes final<sup>255</sup> without asylum seekers having a copy of the decision in written or knowing its content. Decisions, if negative, mandatory provide information about the right to appeal before the court, which is the respective court, as well as the appeal deadline stated in calendar days. During their initial registration asylum seekers are also provided a leaflet with comprehensive translated information in respective languages (English, French, Arabic, Farsi, Dari, Pashto, Kurdish, Urdu, Russian) about their rights, the procedures that follow and list of NGO who provide different type of support, however this list is outdated as many of the NGOs do not operate anymore due to lack of project-based funding. Similar type of information leaflet is provided when the decision is positive.

Appeal procedures are only judicial; the law does not envisage an administrative review of asylum determination decisions. Since 2014, competence for appeals in the regular procedure is distributed among all Regional Administrative Courts, designated as per the residence of the asylum seeker who has submitted the appeal.<sup>256</sup> Up to the present moment, however, this model did not succeed in redistributing the caseload among the national courts, as the majority of asylum seekers reside predominantly in reception centres or in private accommodation in **Sofia** and **Harmanli**. Therefore, the **Sofia** and **Haskovo** Regional Administrative Courts continue to be the ones with the highest caseload, dealing with the appeals against negative first-instance decisions.

Both appeals before the first and second-instance appeal courts have automatic suspensive effect.

The first appeal instance conducts a full review of the case, both on the facts and the points of law. Asylum seekers are summoned and questioned in a public hearing as to the reasons they applied for asylum. Decisions are published,<sup>257</sup> but also served personally to the appellant.

If the first instance appeal decision is negative, asylum seekers can bring their case to the second (final) appeal court, the Supreme Administrative Court (SAC); in this case, the appeal can only regard points of law and does not entail an in-merit examination of the case. At the end of 2019, the Chairperson of the Supreme administrative court took the controversial decision to move the asylum cases from the 3<sup>rd</sup> to 4<sup>th</sup> department. While the 3<sup>rd</sup> department of the SAC had been dealing with asylum cases for more than twenty-two years since the establishment of the Supreme Administrative Court in 1997, the 4<sup>th</sup> department had never been assigned such cases prior to the decision. The arrangement led to a deterioration of the quality of the decisions issued on asylum cases at this highest court instance, whose jurisprudence sets the standards for all lower national administrative courts. Starting from the beginning of 2024 the SAC's

---

<sup>254</sup> Article 76(3) LAR.

<sup>255</sup> Article 76 (4) LAR.

<sup>256</sup> Article 84(2)-(4) LAR in conjunction with Article 133 Administrative Procedure Code.

<sup>257</sup> The Court decisions are available at: <https://bit.ly/2OZU62r> (Sofia court), <https://bit.ly/39nuVjv> (Haskovo court), <https://bit.ly/2MOgihu> (Sliven court) and <https://bit.ly/2Xxki0P> (Supreme administrative court).

3<sup>rd</sup> department resumed to deal with the asylum cases. However, in 2025 an increased number of appeals reached this highest court instance due to increased rejection rates, applied since mid-2024 to Syrian applicants<sup>258</sup>. Therefore, SAC first halted almost entirely the asylum hearings for nearly two months in February and March 2025, and then re-distributed asylum cases among all of its departments, including those of them which have never dealt such case. As a result, in 2025, the SAC issued negative decisions in 92% of the examined asylum cases,<sup>259</sup> the overwhelming majority of the asylum cases brought before this last court instance.

First instance appeal courts must issue their decisions within one month. The next and last court instance SAC is not bound by such deadline. However, even for the first instance court this deadline is indicative and therefore in the past it was not respected, with an average duration of an appeal procedure before the court at both judicial instances up to 12 months. In 2025, regional courts issued their decisions in a period of one month on average, while the Supreme administrative courts did it in a period between 1 to 3 months on average. If the court reverts the first instance decision back, the SAR has 3 months to issue a new decision,<sup>260</sup> complying with the court's instructions on the application of the law. As in previous years, SAR did not fully observe these deadlines, but in 2025 it did not issue any repeated refusals going against the court's instructions.<sup>261</sup> In the past, repeated appeal procedures against the second SAR negative decisions issued in breach of the court instructions, caused some asylum procedures to extend for over 2-3 years. Therefore, the fact that, in 2025, as in 2024, 2023 and 2022, SAR observed court instructions, significantly improved the effectiveness of the judicial control in particular, and in general the length of the asylum procedure.

## 1.5 Legal assistance

### Indicators: Regular Procedure: Legal Assistance

1. Do asylum seekers have access to free legal assistance at first instance in practice?
 

<input type="checkbox"/> Yes	<input type="checkbox"/> With difficulty	<input checked="" type="checkbox"/> No
❖ Does free legal assistance cover:		
<input type="checkbox"/> Representation in interview		
<input type="checkbox"/> Legal advice		
  
2. Do asylum seekers have access to free legal assistance on appeal against a negative decision in practice?
 

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> With difficulty	<input type="checkbox"/> No
❖ Does free legal assistance cover:		
<input checked="" type="checkbox"/> Representation in courts		
<input type="checkbox"/> Legal advice		

The general legal aid system was introduced in Bulgaria in 2005, extending it to court representation in all types of cases beyond its mandatory provision in criminal, child protection and tort disputes. In 2017 the scope of the legal aid was extended<sup>262</sup> to include oral consultations at the national help line<sup>263</sup> or in regional legal aid centres. The condition for the legal aid to be provided is for the person in need of support to lack means and resources to engage a lawyer privately against remuneration.

Since 2013, the Law on Legal Aid provides mandatory legal aid for asylum seekers at all stages of the status determination procedure, funded through the state budget.<sup>264</sup> In practice, due to insufficient funding, free legal aid is only provided to vulnerable persons<sup>265</sup> upon their explicit request. Amendments to the law

<sup>258</sup> See, AIDA 2024 Update on Bulgaria; also, Table Applications and granting of protection status at first instance, page 8 of this report.

<sup>259</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>260</sup> Article 85(5) LAR.

<sup>261</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>262</sup> Articles 30d to 30o Law on Legal Aid, as amended St.G. №13 from 7 February 2017.

<sup>263</sup> National Legal Aid Bureau, tel. 0700 18 250.

<sup>264</sup> Article 22(8) Law on Legal Aid.

<sup>265</sup> §1(17) from Additional Clauses LAR, namely: children, unaccompanied children, disabled, elderly, pregnant, single parents taking care of underage children, victims of trafficking, persons with serious health issues, psychological disorders or persons who suffered torture, rape or other forms of psychological, physical or sexual violence.

in 2020 also entrusted to registered legal aid lawyers<sup>266</sup> the representation of unaccompanied asylum seeking and refugee children both during the procedure, but also after their recognition. Prior to 2022, the law did not explicitly provide that legal aid should be available for beneficiaries of international or temporary protection. The National Legal Aid Bureau in October 2022 put forward a draft proposal to amend the law and include these categories in the scope of the legal aid.<sup>267</sup> The amendment was adopted in December 2022 and entered into force on 26 December 2022.<sup>268</sup> Together with these amendments, the law included in the scope of the legal aid the legal counselling and the preparation of documents for initiating or conducting administrative proceedings, or to appeal the decisions, issued in such proceedings.<sup>269</sup>

### 1.5.1 Legal assistance at first instance

Asylum seekers have the right to ask for the appointment of a legal aid lawyer from the moment of the registration of their asylum application.

After the end of its 2017-mid-2021 AMIF funded project on provision of legal aid to asylum seekers during the administrative phase of the procedure,<sup>270</sup> the National Legal Aid Bureau agreed to continue representing vulnerable applicants under its general rules, which would require the asylum seekers to fill in and submit complicated legal aid applications. The NGO Bulgarian Helsinki Committee, funded by UNHCR, assisted the NLAB with the adaptation and translation of the legal aid forms in English, French, Russian, Arabic, Farsi, Dari, Pashto, Urdu, Kurdish and Turkish languages to facilitate the access to legal aid to vulnerable applicants. A problem persists, however, for those who are illiterate and where the assistance of case workers is the only way to get access to legal aid. Yet, some of them are reluctant to grant access to legal aid as it would mean that their role in and quality of the procedure would be assessed. Therefore, although 115 asylum seekers were identified as vulnerable or with specific needs by SAR in 2025, none of them, or any other applicants, was assisted to get free legal aid at first instance.<sup>271</sup> Over the last two years, this continued to be the most significant deterioration of national practices in this respect, vis-a-vis 50 vulnerable adult applicants assisted with state provided legal aid at first instance in 2021, and 818 vulnerable adult applicants in 2020.<sup>272</sup>

Amendments to the law introduced at the end of 2020 brought a major change in the legal representation of unaccompanied asylum seeking and refugee children.<sup>273</sup> The obligation to represent these children not only in the procedure, but also after the recognition and before all agencies and institutions with regard to their rights and entitlements, was shifted from the municipalities to the National Legal Aid Bureau.<sup>274</sup> The law also introduced conditions for the qualification of the appointed legal aid lawyers and requirements for a representation in the child's best interest. Starting from July 2021, 16 lawyers from the Sofia Bar, 8 lawyers from Haskovo Bar and 3 lawyers from Sliven Bar began implementing the representation of unaccompanied asylum seeking and refugee children. In February 2024, NLAB recruited 20 additional lawyers (18 in Sofia and 2 in Haskovo), vis-à-vis its planned expansion of the Article 25 selected list of representatives.<sup>275</sup> In September 2023, the non-governmental organisation Bulgarian Helsinki Committee communicated its first annual report assessing the quality of the representation provided by Article 25 legal aid lawyers. The general feedback from children in 2025 remained predominantly positive with

---

<sup>266</sup> National Legal Aid Register, available in Bulgarian at: <https://bit.ly/42Syzxe>.

<sup>267</sup> National parliament, Draft amendment of the Law on Legal Aid, reg.No. 48-202-01-19 from 28 October 2022, available in Bulgarian at: <https://bit.ly/3ygoCei>.

<sup>268</sup> State Gazette No.102 from 23 December 2022.

<sup>269</sup> Article 21 (1) Law on Legal Aid, as amended St.G. №102 from 2022.

<sup>270</sup> National Legal Aid Bureau, 'Обява за конкурс за адвокати за работа по проект', 29 January 2018, available in Bulgarian at: <http://bit.ly/2DP376C>.

<sup>271</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>272</sup> SAR, reg. №РД05-40 from 16 January 2023.

<sup>273</sup> National Parliament, Amendments on the Law on Asylum and Refugees (LAR), State Gazette No.89 from 16 October 2020, available at: <https://bit.ly/2LoUMiG>.

<sup>274</sup> Article 25 LAR.

<sup>275</sup> It is important to note that not all listed legal aid lawyers can serve as representatives of unaccompanied children. Only those who meet certain additional criteria, when recruitment is announced by NLAB, can be listed among the limited number of those selected as fit to represent unaccompanied children.

respect to legal aid lawyers acting in Sofia reception centres and predominantly reserved to negative with respect to legal aid lawyers acting in Harmanli reception centre, although certain slight improvement were reported with respect to assistance to appeal negative decisions.<sup>276</sup> The monitoring was extended in 2025, based on a formal agreement<sup>277</sup> between the Ministry of Justice and UNICEF. The next report, due in May 2026 has to provide both general findings about the overall quality of the legal representation as well as individual assessment of acting legal aid lawyers. On 14 March 2024, the NLAB Executive Committee decided that quality assessments of legal aid providers ought to be introduced in the law in order to allow striking of underperforming representatives out of the limited Article 25 list. Such amendments had been already proposed and included in the draft law, submitted by SAR in February 2024,<sup>278</sup> however the draft never made to the Parliament due to the continued constitutional crisis experienced by the country since mid-2022. The national plan for the EU Migration and Asylum Pact's Implementation<sup>279</sup> adopted on 19 December 2024 envisaged a revision of the ordinance's provisions to make them correspond to the Pact's rules and procedures with a deadline for these amendments set for December 2025. Such amendments however were not formally adopted until 31 December 2025 (see [Overview](#)).

Other asylum seekers, who were not recognised as having specific vulnerabilities, did not enjoy access to legal aid at the first instance of the asylum procedure even in previous or following years.

### 1.5.2 Legal assistance in appeals

The aforementioned AMIF-funded pilot project on legal aid, which was carried out up until 31 January 2021, also covered assistance in the preparation of appeals before the court. As mentioned above, it ended on 31 July 2021.

Otherwise, for regular applicants on appeal, national legal aid arrangements only provide for state-funded legal assistance and representation after a court case has been initiated, i.e. after the appeal has been drafted and lodged. In principle the law allows legal aid to be requested and awarded by the National Legal Aid Bureau (NLAB) before that, which for asylum seekers mean that they can approach NLAB and be assigned legal aid for submission of an appeal against served SAR refusal, especially after the amendments of the law<sup>280</sup> in 2022. However, NLAB is situated solely in the capital Sofia without regional offices across the country, and it functions with 23 staff members who are also responsible for all other national caseload where legal aid should be mandatory rendered, e.g. criminal trials, parental disputes, etc. Therefore, in practice it is impossible for refused asylum seekers to secure legal aid for submission of an appeal in the very tight 7- or 14-days deadlines.

As a result, since the establishment of the national asylum authority in 1994, asylum seekers rely entirely for their access to the court, namely for drafting and lodging the appeal, on NGOs or private practitioners for those who have sufficient financial means to afford it. Therefore, main support in this respect has ever been rendered by the non-governmental organisation Bulgarian Helsinki Committee as UNHCR's prime legal partner since 1994. However, due to UN financial crisis BHC was forced to close its legal reception offices on 1 January 2026 and thereafter<sup>281</sup>, thus leaving asylum seekers without a reliable free of charge legal assistance for access to court and timely submission of appeals before the court against negative decisions refusing or revoking international protection. The only free-of-charge legal assistance that remained readily available in this respect<sup>282</sup> is weekly in Sofia at the Red Cross's Information Bureau every Thursday from 10:30 to 12:30, provided by the non-governmental from Centre for Legal Aid – Voice

---

<sup>276</sup> Bulgarian Helsinki Committee/UNICEF, Annual report on quality of legal representation of unaccompanied children, 10 January 2025.

<sup>277</sup> Memorandum of Understanding and Cooperation between Ministry of Justice of the Republic of Bulgaria and the United Nations Children's Fund (UNICEF), signed on 19 September 2024.

<sup>278</sup> SAR, reg.№LJY-04-408 from 14 February 2024.

<sup>279</sup> COM №883 from 19 December 2024, available in Bulgarian [here](#).

<sup>280</sup> Article 22, Para 1(8) of Law on Legal Aid (St.G.№102/2022).

<sup>281</sup> Bulgarian Helsinki Committee, The BHC Legal Aid Reception for Refugees and Migrants ceased its operation on 1 January 2026, published on 12 January 2026, available [here](#).

<sup>282</sup> UNHCR Representation in Bulgaria, Legal Awareness, available [here](#).

in Bulgaria, as well as also weekly in Harmanli at UNHCR's COMPASS centre, provided by one BHC lawyer.

## 2. Dublin

### 2.1 General

Dublin statistics: 1 January – 31 December of 2025

Outgoing procedure			Incoming procedure		
	Requests	Transfers		Requests	Transfers
<b>Total</b>	<b>93</b>	<b>41</b>	<b>Total</b>	<b>5,400</b>	<b>434</b>
<b>Take charge</b>	<b>28</b>	<b>34</b>	<b>Take charge</b>	<b>1,138</b>	<b>90</b>
Malta	1	-	Austria	16	3
Sweden	2	3	Belgium	126	4
France	1	-	Croatia	111	-
Germany	16	17	Czech Republic	12	1
Romania	5	-	Denmark	13	-
Ireland	1	-	Finland	3	9
Italy	1	-	France	244	7
Norway	1	2	Germany	373	38
Austria	0	9	Greece	66	2
Spain	0	1	Iceland	4	-
Netherlands	0	2	Ireland	1	-
			Italy	49	-
			Luxembourg	2	-
			Netherlands	57	3
			Norway	10	9
			Poland	5	3
			Portugal	3	-
			Slovenia	4	-
			Sweden	13	8
			Switzerland	26	3
<b>Take back</b>	<b>65</b>	<b>7</b>	<b>Take back</b>	<b>4,262</b>	<b>344</b>
Austria	5	-	Austria	234	71
Belgium	3	1	Belgium	172	16
Switzerland	4	-	Croatia	406	1
Germany	28	5	Czech Republic	1	5
Denmark	1	-	Denmark	2	-
Spain	1	-	France	613	5
France	2	-	Germany	1,218	183
Greece	11	-	Greece	7	2
Croatia	1	1	Hungary	10	7
Italy	2	-	Ireland	100	-
Netherlands	4	-	Italy	190	-

Romania	1	-	Lithuania	3	-
Sweden	2	-	Luxembourg	8	2
			Malta	7	-
			Netherlands	108	28
			Norway	10	2
			Poland	5	2
			Portugal	1	-
			Romania	42	2
			Slovakia	1	2
			Slovenia	929	1
			Spain	6	-
			Sweden	10	4
			Switzerland	180	11

Source: SAR.

Outgoing Dublin requests by criterion: 2025		
Dublin III Regulation criterion	Requests sent	Requests accepted
<b>“Take charge”: Articles 8 to 17</b>	<b>46</b>	<b>8</b>
Article 8 (minors)	23	4
Article 9 (family members granted protection)	6	2
Article 10 (family members pending determination)	11	2
Article 11 (family procedure)	0	0
Article 12 (visas and residence permits)	0	0
Article 13 (entry and/or remain)	0	0
Article 14 (visa free entry)	6	0
“Take charge”: Article 16	0	0
“Take charge” humanitarian clause: Article 17(2)	0	0
<b>“Take back”:</b>	<b>65</b>	<b>15</b>
Article 18 (1) (b)	65	15
Article 18 (1) (c)	0	0
Article 18 (1) (d)	0	0
Article 20(5)	0	0

Source: SAR.

Incoming Dublin requests by criterion: 2025		
Dublin III Regulation criterion	Requests received	Requests accepted
<b>“Take charge”: Articles 8</b>	<b>1,127</b>	<b>859</b>
Article 8 (minors)	0	0
Article 9 (family members granted protection)	48	4
Article 10 (family members pending determination)	12	1
Article 11 (family procedure)	22	5
Article 12 (visas and residence permits)	907	832
Article 13 (entry and/or remain)	137	17

Article 14 (visa free entry)	1	0
“Take charge”: Article 16	0	0
“Take charge” humanitarian clause: Article 17(2)	11	6
<b>“Take back”: Articles 18 and 20(5)</b>	<b>4,262</b>	<b>2,578</b>
Article 18 (1) (b)	4,260	2,577
Article 18 (1) (c)	0	0
Article 18 (1) (d)	2	1
Article 20(5)	0	0

Source: SAR.

The LAR does not establish criteria to determine the state responsible but simply refers to the criteria listed in the Dublin Regulation.

### 2.1.1 Application of the Dublin criteria

Family unity criteria are applied fully, though in practice the prevailing type of cases relate to joining family members outside Bulgaria, not the opposite. If the family link cannot be established or substantiated through relevant documents, some EU Member States (e.g., the **Netherlands**) require DNA tests in cases of unaccompanied children to prove their origin. In such cases the parent or parents are usually advised to travel to Bulgaria and provide blood samples to be matched, tested, and compared with the unaccompanied child or children’s DNA. Considering that the majority of asylum seekers arrive in Bulgaria via **Türkiye** and **Greece**, cases when the responsibility of another EU Member State can be established under any other of the Dublin criteria, except the family provisions, are scarce.

The most common criteria that continue to be applied in incoming cases are previously issued documents and first Member State of entry, as well as “take back” cases. Bulgaria accepts responsibility for the examination of asylum applications based on the humanitarian clause, and mostly vis-à-vis document and entry reasons. In 2025<sup>283</sup>, Bulgaria received 1,127 incoming requests and made 46 outgoing requests, compared to 10,691 incoming and 118 outgoing requests in 2024; 17,899 incoming and 136 outgoing requests in 2023; 20,014 incoming and 175 outgoing requests in 2022; 7,811 incoming and 190 outgoing requests in 2021; 1,904 incoming requests and 116 outgoing requests in 2020; and 3,088 incoming and 80 outgoing requests in 2019.

Incoming / Outgoing Dublin requests ratio: 2019 - 2025		
Year	Incoming requests	Outgoing requests
2019	3,088	80
2020	1,904	116
2021	7,811	190
2022	20,014	175
2023	17,889	136
2024	10,691	118
2025	5,400	93

### 2.1.2 The dependent persons and discretionary clauses

In the past, the sovereignty clause under Article 17(1) of the Regulation was used in few cases, mainly for family or health condition reasons. The sovereignty clause has never been applied for reasons different than humanitarian ones. From 2017 until 2021, Bulgaria did not apply the sovereignty clause. In 2022,

<sup>283</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

Bulgaria applied the humanitarian clause of Article 17(2) in 1 case, but none in the following 2023 and 2024. However, in 2025 Bulgaria accepted and applied the humanitarian clause in 6 out of 11 requested cases.<sup>284</sup>

## 2.2 Procedure

### Indicators: Dublin: Procedure

1. Is the Dublin procedure applied by the authority responsible for examining asylum applications?  
 Yes  No
2. On average, how long does a transfer take after the Dublin Unit has sent a request?  
3 and a half months<sup>285</sup>

The LAR establishes the Dublin procedure as a non-mandatory stage, which is applied only following a decision from the caseworker assigned to the specific case, only if there are indications regarding the possibility to establish that another Member State is responsible to examine the asylum application in question.<sup>286</sup> In June 2022 the government adopted amendments<sup>287</sup> to the ordinance<sup>288</sup> regulating the coordination between the asylum and police (border and immigration) administrations while implementing Dublin III Regulation. The amendments updated and clarified the division of responsibilities among these authorities, but did not bring any noticeable change as they only formalised the already existing practical arrangements. The national plan for the EU Migration and Asylum Pact's Implementation<sup>289</sup> adopted on 19 December 2024 envisaged a revision of the ordinance's provisions to make them correspond to the Pact's rules and procedures with a deadline for these amendments set for December 2025. Such amendments however were not formally adopted until 31 December 2025.

Eurodac has been used as an instrument for checking the status records of all irregular migrants. Fingerprints taken by the Border or Immigration Police are uploaded automatically in the Schengen Information System (SIS) and can be used to implement the Dublin Regulation. Nonetheless, all asylum seekers are systematically fingerprinted again by the Dublin Unit of the SAR for technical reasons. The national plan for the EU Migration and Asylum Pact's Implementation<sup>290</sup> envisaged revision and amendments of series of national rules and procedures, which safeguard the functioning of Eurodac at national level. No progress was made until 31 December 2025.

In 2020, the law was amended to optimise the decision-making in Dublin procedures by obliging the asylum agency to issue formal decisions only if another Member State has taken charge of or taken back the responsibility to examine the case. If this is not the case, asylum applications are automatically referred for eligibility determination without any written referral decision required, which has been the rule before the amendment. However, many problems are still created by the fact that the decision-making process remains centralised as far as the Dublin decisions are concerned, as such decisions can be issued only by the SAR's Dublin Unit, which is located in the headquarters of the SAR in **Sofia**.<sup>291</sup> It used to create problems with meeting the 3-month deadline under the Dublin Regulation for issuing a request to another Member State, due to the congested communications between the Dublin Unit and the local reception centre outside Sofia. Presently, problems in this respect still rarely occurs due to the fact that the paperwork has to be prepared by the respective case-workers, who are presently not overburdened with their status determination caseload due to the overall decrease in the number of the new arrivals.

<sup>284</sup>

Ibid.

<sup>285</sup>

SAR, reg. No. №РД05-31 from 15 January 2024.

<sup>286</sup>

Article 67a(2) LAR.

<sup>287</sup>

State Gazette No.46 from 21 June 2022.

<sup>288</sup>

COM No.332/2007: Наредба за отговорността и координацията на държавните органи, осъществяващи действия по административно сътрудничество при прилагането на регламент Дъблин и регламент Евродак.

<sup>289</sup>

COM №883 from 19 December 2024, available in Bulgarian [here](#).

<sup>290</sup>

Ibid.

<sup>291</sup>

SAR, Annual report on procedures for international protection in 2023, available in Bulgarian at: <https://bit.ly/3lgTCjm>.

Therefore, no delays are being presently observed in the preparation of the relevant documentation and its referral to the Dublin Unit in the headquarters in order to make a proper Dublin request.

### 2.2.1 Individualised guarantees

In practice, Bulgaria does not seek individualised guarantees to ensure that asylum seekers will have adequate reception conditions upon transfer. The overwhelming part of outgoing transfers relating to vulnerable groups were carried out with respect to unaccompanied children since 2016 and up until the end of 2024.<sup>292</sup> Since all transfers were based on family reunification and consent from the children and family members, the Dublin Unit did not request guarantees from receiving countries.

It is also a general understanding among national stakeholders that the reception conditions in the countries of transfer, e.g. such as Germany, Norway, Sweden and even the neighbouring Romania in 2025, are better in most aspects than those in Bulgaria.

### 2.2.2 Transfers

In cases where another Member State accepts the responsibility to examine the application of an asylum seeker who is in Bulgaria, the outgoing transfer was usually implemented within 3 months on average, while the take back requests were usually implemented within one and a half months.<sup>293</sup>

Asylum seekers are usually not detained upon notification of the transfer. However, in certain cases, transferred asylum seekers can be detained for up to 7 days before the transfer as a precautionary measure to ensure their timely boarding of the plane. In all cases the transfer is carried out without an escort. It should be noted that in the past asylum seekers sometimes agreed to be detained for a couple of days before the flight to the responsible Member State as this was the only way for them to avoid any procedural problems that can delay their exit. No cases of detention based on this ground were reported in 2025.<sup>294</sup>

Asylum seekers due to be transferred under the Dublin Regulation to another Member State are given a written decision stating the grounds for applying the Dublin III and the right to appeal the transfer to the other Member State before the court. However, asylum seekers are not informed of the fact that requests have been made for “take back” or “take charge” requests to the Member State deemed responsible, nor of any progress made with regard to such requests, unless the applicants actively require information on the progress, when the information is provided by SAR in due course.

In 2025, 43 outgoing transfers were carried out compared to 93 requests, indicating a 44% outgoing transfer rate. In the same time period, out of 5,400 incoming requests, just 434 transfers were carried out in practice, thus marking 8% incoming transfer rate. The majority of outgoing Dublin transfers were of unaccompanied or accompanied children or other family members.

## 2.3 Personal interview

### Indicators: Dublin: Personal Interview

Same as regular procedure

1. Is a personal interview of the asylum seeker in most cases conducted in practice in the Dublin procedure?  Yes  No

❖ If so, are interpreters available in practice, for interviews?  Yes  No

2. Are interviews conducted through video conferencing?  Frequently  Rarely  Never

<sup>292</sup> SAR, reg. №ΠΟ-02-115 from 22 February 2026: 41 out of 93 outgoing requests in total.

<sup>293</sup> Ibid.

<sup>294</sup> Ibid.

The law does not require to conduct a personal interview in the Dublin procedure. Instead, it gives the interviewer an opportunity to decide whether an interview is necessary in light of all other relevant circumstances and evidence.<sup>295</sup> If an interview is conducted, it is mostly follows the same rules and practices as eligibility interviews in the [Regular Procedure](#), except relating to the type of questions asked in order to verify and apply Dublin criteria. Similar to the regular procedure, an audio or audio-video recording is now mandatory and applied in the majority of cases.<sup>296</sup>

## 2.4 Appeal

### Indicators: Dublin: Appeal

Same as regular procedure

1. Does the law provide for an appeal against the decision in the Dublin procedure?

- |                            |  |   |
|----------------------------|--|---|
| ❖ If yes, is it            | <input checked="" type="checkbox"/> Yes      | <input type="checkbox"/> No             |
| ❖ If yes, is it suspensive | <input checked="" type="checkbox"/> Judicial | <input type="checkbox"/> Administrative |
|                            | <input type="checkbox"/> Yes                 | <input checked="" type="checkbox"/> No  |

Contrary to appeal against other decisions, appeals against decisions in the Dublin procedure are heard only before the Administrative Court of **Sofia** and only at one instance. Dublin appeals do not have automatic suspensive effect, but it can be awarded by the court upon an explicit request from the asylum seeker.

The time limit for lodging the appeal is 7 calendar days, which is equal to the time limit for appeal in the [Accelerated Procedure: Appeal](#). Appeal procedures are held in an open hearing, and legal aid can also be awarded.

In practice, the court accepts all kinds of evidence in support of the appeal, including on the level of reception conditions and procedural guarantees to substantiate its decision. The court's practice however is quite poor, as very few Dublin decisions on transfers to other Member States are challenged and even fewer overturned. For this reason, no clear conclusions can be made as to whether the Administrative Court of **Sofia** takes into account the reception conditions, procedural guarantees and recognition rates in the responsible Member State when reviewing the Dublin decision.

## 2.5 Legal assistance

### Indicators: Dublin: Legal Assistance

Same as regular procedure

1. Do asylum seekers have access to free legal assistance at first instance in practice?

- |                                     |  |  |  |
|-------------------------------------|--|--|--|
|                                     | <input type="checkbox"/> Yes                         | <input type="checkbox"/> With difficulty | <input checked="" type="checkbox"/> No |
| ❖ Does free legal assistance cover: | <input type="checkbox"/> Representation in interview |  |  |
|                                     | <input type="checkbox"/> Legal advice                |  |  |

2. Do asylum seekers have access to free legal assistance on appeal against a Dublin decision in practice?

- |                                    |  |   |                             |
|------------------------------------|--|---|-----------------------------|
|                                    | <input type="checkbox"/> Yes                                 | <input checked="" type="checkbox"/> With difficulty | <input type="checkbox"/> No |
| ❖ Does free legal assistance cover | <input checked="" type="checkbox"/> Representation in courts |   |                             |
|                                    | <input type="checkbox"/> Legal advice                        |   |                             |

The Law on Legal Aid provides for state-funded representation at first instance and appeal. As a result, legal aid financed by the state budget should have become available to asylum seekers during the Dublin procedure since 2013, in addition to the already available legal aid during an appeal procedure before the court. However, in practice in 2025, legal aid to initiate and undergo a Dublin procedure was only provided to unaccompanied asylum-seeking children in order to assist their reunion with parents, relatives or family members in other European countries. This special legal aid was provided under the adopted 2020 amendment to the law, when the obligation to represent unaccompanied children was shifted from the

<sup>295</sup> Article 67b(2) LAR.

<sup>296</sup> Article 63a(3) LAR.

municipalities to the National Legal Aid Bureau (see section [Regular Procedure: Legal Assistance](#)).<sup>297</sup> The statutory legal aid lawyers who represented unaccompanied children were assisted with training, interpretation and support to make sure that they are able to provide adequate and child-friendly information, and to manage their Dublin cases in accordance with the *ad-hoc* arrangements established jointly by NGO BHC and SAR's Dublin Unit since August 2019. These ad-hoc arrangements were funded by UNICEF and ended on 31 December 2023. In 2023-2024, BHC lawyers and paralegals in all SAR reception centres, whose activity was funded by UNHCR, were assisting the interaction and communication of unaccompanied children in Dublin procedures with their appointed legal aid representatives as neither the asylum agency, nor the NLAB were able to provide for such communication or interpretation. The presence of BHC lawyers or paralegals in SAR reception centres however ended on 31 December 2024 as the UNHCR funding for these activities was not extended in 2025. Therefore, in 2025 no such assistance was provided.

## 2.6 Suspension of transfers

### Indicators: Dublin: Suspension of Transfers

1. Are Dublin transfers systematically suspended as a matter of policy or jurisprudence to one or more countries?  Yes  No
- ❖ If yes, to which country or countries?

Bulgaria had suspended all Dublin transfers to **Greece** in 2011, based on the European Commission Fourth Recommendation,<sup>298</sup> thereby assuming responsibility for examining the asylum applications of the asylum seekers concerned.

In 2023, Bulgaria resumed take back request to Greece with 2 requests sent, however, no transfers were implemented. In 2025, Bulgaria made 0 take charge and 11 take back requests to Greece, with no transfers implemented.

Suspensions of transfers are not automatic, as there might be cases of “take charge” requests where applicants have family members in other EU Member States or other circumstances that engage the responsibility of another state. Due to the level of material reception conditions in Bulgaria, there have just several appeals against Dublin transfer decisions to other EU Member States.

## 2.7 The situation of Dublin returnees

In 2025, Bulgaria received 5,400 incoming requests under the Dublin Regulation and 434 incoming transfers.<sup>299</sup> In 2025, the number of Dublin returns actually implemented to Bulgaria decreased by 26% while during the previous year these were, respectively a decrease by 1,3% compared to 2023, increased by 192% compared to 2022, increased by 158% compared to 2021 and increased 1,342% compared to 2020 (see table below). Overall, the percentage of actual transfers remains moderate compared to the number of incoming requests.

<sup>297</sup> Article 25 LAR.

<sup>298</sup> Commission Recommendation on the resumption of transfers to Greece under Regulation (EU) No. 604/2013, C(2016) 8525, 8 December 2016.

<sup>299</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

Incoming Dublin requests and transfers: 2015-2025											
	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Requests	8,131	10,377	7,934	3,448	3,097	1,904	7,811	20,014	17,899	10,691	5,400
Transfers	262	624	446	86	73	14	78	202	590	589	434

Source: Eurostat, migr\_dubro and migr\_dubto; SAR.

Asylum seekers who are returned from other Member States in principle do not face any obstacles in accessing the territory of Bulgaria upon return. Prior to the arrival of Dublin returnees, the SAR informs the Border Police of the expected arrival and indicates whether the returnee should be transferred to a reception centre or to immigration pre-removal detention facility. This decision depends on the **phase of the Bulgarian asylum procedure of the Dublin returnee** as outlined below:

- ❖ If the returnee has a pending asylum application in Bulgaria, or the procedure was terminated because of the returnee's absconding, he or she is transferred to a SAR reception centre. In the past, the SAR usually suspended asylum procedures when asylum seekers had left Bulgaria before their procedures were completed. After the amendments of the law in 2020, the SAR obtained the right to directly terminate (discontinue) the asylum procedure in such cases without passing through a stage of suspension. In both cases, no decision on the merits is issued, therefore the procedure can be reopened.<sup>300</sup>
- ❖ If, however, the returnee's asylum application was rejected with a final decision on the merits before, or after, leaving Bulgaria, and the decision was served *in absentia* and therefore became final,<sup>301</sup> the returnee is transferred to one of the immigration pre-removal facilities, usually to the **Busmantsi** detention centre in Sofia, but also to the **Lyubimets** detention centre near the Turkish border. Such refusal and serving of the refusal's decision *in absentia* is legally possible,<sup>302</sup> if an interview has been conducted<sup>303</sup> with the returnee prior their absconding from Bulgaria and if based on the information gathered from the interview the case worker could form an opinion about the credibility of the asylum claim. In the case of families, when returned, parents whose application was finally rejected are usually detained together with their children. In exceptional cases children may be placed in childcare social institutions while their parents are detained in immigration facilities, however it is applied only when an expulsion order on account of threat to national security is issued to any of the parents.

Since 2020, the LAR explicitly provides for the mandatory reopening<sup>304</sup> of an asylum procedure with respect to an applicant who is returned to Bulgaria under the Dublin Regulation, provided that s/he has **not** been issued a decision on merits while *in absentia*.<sup>305</sup> The SAR's practice following this particular amendment has been so far in line with the law, and returnees whose asylum procedures had been only terminated (discontinued) after their absconding do not face obstacles in principle to have their determination procedures reopened. However, it does not secure their access to state provided food and accommodation in reception centres as these are guaranteed only to vulnerable applicants.<sup>306</sup>

For any other Dublin returnees, who are not considered vulnerable, food and accommodation are contingent to the limited national reception capacity and availability. If there is no available place for

<sup>300</sup> Article 77(3) LAR.

<sup>301</sup> Articles 18(1)(d) and (2) Dublin III Regulation.

<sup>302</sup> Article 76(4) LAR.

<sup>303</sup> Article 63a(1), (5) and (7) LAR.

<sup>304</sup> Article 77(3) LAR.

<sup>305</sup> Article 18(2) Dublin III Regulation.

<sup>306</sup> Article 29(7) LAR.

accommodation in reception centres of the asylum agency SAR, Dublin returnees will have to secure accommodation and nutrition at their own expenses. In 2025, despite the overall decrease in the number of the new arrivals, SAR continued to refuse<sup>307</sup> accommodation in its reception centres the Dublin returnees who were not identified as vulnerable, despite the decreasing number of new arrivals (-68% in 2025, -45% in 2024, +10% in 2023, +55% in 2022; +205% in 2021),<sup>308</sup> on account of the continuously shrinking reception capacity due to multiannual lack of funding for repairs and refurbishment, which is why in practice only 3,125<sup>309</sup> out of 5,160 official accommodation places were assessed as fit for living (3,225 in 2024; 3,592 in 2023; 3,932 in 2022)<sup>310</sup> (see [Overview of the main changes since the previous report update, Reception capacity](#)). In its reply<sup>311</sup> to the findings of this report, the SAR indicated that in 2025 all Dublin returnees, whose procedures have not been finalised with an effective decision on the merits, and who arrived in Bulgaria following a transfer decision from another EU MS, have been accommodated in the RRCs of SAR, mainly in the shelter in Vrazhdebna, though it did not provide the actual number of Dublin returnees who benefitted of this change in their practice.

Although the access to the national health care system is automatically reinstated after the Dublin return,<sup>312</sup> the national health care package is generally scarce and does not provide for any tailored medical or psychological treatment or support, nor for the treatment of many chronic diseases or surgical interventions, prosthetics, implants or other necessary medications or supplies.<sup>313</sup> Therefore the patients need to pay for them at their own expense.

Access to the labour market is guaranteed to asylum seekers after a period of three months from their personal registration and for the duration of the procedure.<sup>314</sup> However, the national economic situation remains challenging. Any improvements which finally started to occur after the end of COVID-19 pandemic were reverted in the beginning of 2022 by the war in Ukraine and the following economic recess across Europe. It further complicated asylum seekers and refugees' employment and self-sufficiency. In 2025, the State Refugee Agency issued 847 work permits to asylum seekers who were looking to support themselves while their asylum claims were being processed.<sup>315</sup> Out of them, only 2% or 3 asylum seekers and 16 persons granted international protection were employed through employment programs, while the rest found work independently and on their own initiative.<sup>316</sup>

If, however, the Dublin returnee is among those, whose asylum procedures ended prior their return to Bulgaria with a refusal *in absentia* on the merits (substance), they are treated as irregular migrants with no access to the labour market, health care system or any other services that require legal residence and an identity document. In the majority of cases, these returnees are arrested upon return and detained in **Busmantsi** or **Lyubimets** pre-removal immigration centres to further enable their removal. In the few cases when the returnees are not detained after their arrival, usually – due to administrative or institutional entanglements, they may face homelessness and destitution because of their irregular status in Bulgaria and the lack of valid residence and/or identity documents. This means that even, if the returnees do have financial means, their access to the labour market and most of the basic public services (health care, social support, bank services, etc.) is nearly impossible.

In principle, no “take back” requests have been made so far under the Dublin Regulation regarding individuals with special needs. In the few cases in the past where the return of families with minor children, the requesting Member states usually asked the assurances of SAR for accommodation, adequate reception conditions as well as the nature of the services that will be provided. Usually, these individual

---

<sup>307</sup> SAR, 137<sup>th</sup> Coordination Meeting, held on 27 March 2025.

<sup>308</sup> MOI statistics, December 2023, available in Bulgarian at: <https://bit.ly/48C57wC>.

<sup>309</sup> SAR, reg. №П0-02-115 from 22 February 2026.

<sup>310</sup> See, AIDA Updates on 2024, 2023 and 2022.

<sup>311</sup> SAR, reg. № КП-04-2611 from 5 May 2026.

<sup>312</sup> Article 29(8) LAR.

<sup>313</sup> National Health Insurance Office, statutory health care package, available in Bulgarian at: <https://bit.ly/3nDcrU1>.

<sup>314</sup> Article 29 (3) LAR.

<sup>315</sup> SAR, reg. №П0-02-115 from 22 February 2026.

<sup>316</sup> Employment Agency, reg. No. ПД-08-16 from 7 January 2026.

guarantees are not made via DubliNet, but by using the available diplomatic channels, in most cases by the respective Member State's embassy in Bulgaria.

Several courts in other European countries ruled on cases of transfer decisions towards Bulgaria.

In 2025, several administrative courts in Germany addressed Dublin transfers to Bulgaria, with varying outcomes. The Administrative Court Würzburg, for example prevented with its decision of 13 January 2025, an Armenian mother and her disabled daughter from being removed to Bulgaria. The applicants had challenged the BAMF's order to transfer them to Bulgaria.<sup>317</sup> The court found that Bulgaria's asylum and reception system contained systemic deficiencies for highly vulnerable individuals, including inadequate medical care, poor living conditions, and lack of protection mechanisms.<sup>318</sup> These deficiencies created a real risk of inhuman or degrading treatment under Art. 3 ECHR and Art. 4 EU Charter, justifying Germany's assumption of responsibility for examining their asylum claims.<sup>319</sup> Similarly, the Administrative Court Düsseldorf prevented the transfer of an Armenian man in a wheelchair to Bulgaria due to serious health conditions requiring treatment unavailable there.<sup>320</sup> Both decisions emphasized that Dublin transfers can be blocked when systemic shortcomings in the receiving country expose highly vulnerable persons to risks of extreme material deprivation or threats to human dignity, even if general economic hardship alone would not suffice. On the other hand, in three publicly available decisions, administrative courts held that transfers could proceed when the risk of inhuman or degrading treatment was not sufficiently high. The Administrative Court Saarland in a case pertaining to a family with minor children concluded that the living conditions and childcare options did not amount to a risk of inhuman or degrading treatment and the family could be transferred to Bulgaria.<sup>321</sup> Similarly, the Administrative Court Cologne held in May 2025 that a family seeking international protection in Germany could not prevent their transfer, with the court noting that while Bulgaria's asylum system was imperfect, it did not create a real risk of violations of fundamental rights.<sup>322</sup> Finally, the Higher Administrative Court Baden-Württemberg upheld a removal order, as the court found no systemic deficiencies in Bulgaria sufficient to trigger protection.<sup>323</sup> The Bavarian Refugee Council, a local NGO, reported about a dramatic case relating to a transfer to Bulgaria unfolding in spring of 2025. A seriously ill Syrian woman in her 60s with cancer was deported from Germany to Bulgaria on 26 March 2025, despite her medical condition and family ties to Germany, where her two sons live and one works as a doctor who had pledged to cover all her medical costs.<sup>324</sup> After a court in Würzburg ruled on April 7 that she should be allowed to return, her repatriation became impossible because the Central Foreigners Authority had retained her Syrian passport during the deportation - a critical error that prevents the German embassy in Sofia from issuing the necessary visa for her return.<sup>325</sup> Weeks later, she remained stranded in Bulgaria in deteriorating health conditions, urgently needing tumor surgery and authorities have failed to respond to repeated requests to return the passport or provide assistance.<sup>326</sup>

In France, the administrative court of Nantes established that in 2025 the situation of asylum applicants in Bulgaria still justified cancellation of transfers to this country.<sup>327</sup>

In the Netherlands, In a judgment of 4 April 2017, the Council of state confirmed that the principle of mutual trust applies to Bulgaria.<sup>328</sup> In 2022, various Regional Courts referenced the Council of State judgement regarding pushbacks in Croatia (see above) and ruled that the widespread practice of

---

<sup>317</sup> Administrative Court Würzburg, 13 January 2025 – W 6 K 24.50451, available [here](#).

<sup>318</sup> Ibid.

<sup>319</sup> Ibid.

<sup>320</sup> Administrative Court Düsseldorf, 21.07.2025 – 29 K 1083/25, available [here](#).

<sup>321</sup> Administrative Court Saarland, 07 November 2025, 3 L 1857/25, available [here](#).

<sup>322</sup> Administrative Court Cologne, 15 May 2025, 23 L 1145/25.A, available [here](#).

<sup>323</sup> Higher Administrative Court Baden-Württemberg, 12 March 2025, A 4 S 256/24, available [here](#).

<sup>324</sup> Bayerischer Flüchtlingsrat, "Krebskranke Frau aus Krankenhaus nach Bulgarien abgeschoben," April 11, 2025, available [here](#) and Bayerischer Flüchtlingsrat, "Update Abschiebung nach Bulgarien: Fataler Fehler der Ausländerbehörde," April 2025, available [here](#).

<sup>325</sup> Ibid.

<sup>326</sup> Ibid.

<sup>327</sup> Administrative court of Nantes, 6 February 2025, n°2500780.

<sup>328</sup> Council of State, ECLI:NL:RVS:2017:885, 4 April 2017, available in Dutch at: <https://bit.ly/41RrsVQ>.

pushbacks in Bulgaria also stands in the way of Dublin transfers to that Member State.<sup>329</sup> The Council of State ruled on 16 August 2023 that the Minister did not need to conduct further research regarding the Bulgarian situation, because the pushbacks in Bulgaria only happen at the borders.<sup>330</sup> Dublin returnees have limited moving space, and as such will not be subjected to pushbacks. Additionally, the accommodation situation was not deemed severe enough to contradict the principle of mutual trust. As a result, Dublin transfers to Bulgaria continued, also in 2025.

Additional information on the access of Dublin returnees to reception and healthcare can be found in the sections on [Access and forms of reception conditions](#) and [Health care](#).

### 3. Admissibility procedure

#### 3.1 General (scope, criteria, time limits)

The admissibility assessment is no longer part of the [Accelerated Procedure](#), but a separate procedure that can be applied prior or during the status determination.<sup>331</sup>

The examination can result in finding the asylum application inadmissible, where the applicant:<sup>332</sup>

1. Following a timely invitation, the applicant does not appear for an interview and, in 30 days thereof, does not present any objective reasons for his omission;
2. The applicant failed twice to be found at the registered address of residence or at another address indicated by him/her;
3. The applicant changes the address of residence without notifying the State Agency for Refugees and within 30 days does not indicate any objective reasons for the change;
4. The applicant refuses on three or more occasions to cooperate with the staff of the State Agency for Refugees to clarify the circumstances related to his application;
5. The applicant withdraws the application for international protection;
6. Has been granted international protection in another EU Member State;
7. Is granted asylum by the President of the Republic;
8. Is deceased;
9. Is issued a decision Article 67c, para. 1, item 1<sup>333</sup>, which allows his transfer to another EU Member State.

In the hypotheses from 1 to 5, the application can be rejected under the [Accelerated Procedure](#), if sufficient evidence has been gathered to consider the application as manifestly unfounded.<sup>334</sup>

Out of all inadmissibility grounds set out in the LAR and mirroring the recast Asylum Procedures Directive, Bulgaria applies solely the ground relating to [Subsequent Applications](#). It provides the opportunity to consider them based on a preliminary examination whether new elements or findings have arisen or been presented by the applicants relating to their personal situation or country of origin.<sup>335</sup> The admissibility assessment of subsequent applications differs in many aspects from the rules, deadlines and guarantees applicable when an inadmissibility decision is taken on the basis of the other admissibility grounds. The provisions listed above which refer to grounds for terminating asylum procedure could be re-open once on the applicant's request within 9 months from the date of termination.<sup>336</sup> Whenever the admissibility procedure is applied in the case of a subsequent application, said application can be deemed inadmissible

---

<sup>329</sup> Regional court of Utrecht, NL22.7820 and NL22.7821, 15 May 2022; Regional Court Haarlem, NL22.12598, 29 July 2022.

<sup>330</sup> Council of State, ECLI:NL:RVS:2023:3133, 16 August 2023, available in Dutch at: <https://bit.ly/42z1eHq>.

<sup>331</sup> Article 15 LAR.

<sup>332</sup> Article 13(2)(1)-(5) LAR.

<sup>333</sup> Dublin transfers.

<sup>334</sup> Article 15(2) LAR.

<sup>335</sup> Articles 75a to 76c-76d LAR.

<sup>336</sup> Article 77(2) LAR.

unless new circumstances are presented.<sup>337</sup> In such cases, the asylum authority refuses to open a new subsequent procedure to review the case once more after the first final refusal on its merits.

In 2025, 430 applicants submitted subsequent asylum claim and were dealt with in an admissibility procedure. Of these, 400 (95%) were declared inadmissible and 23 (5%) were granted access to a new procedure for a subsequent determination.<sup>338</sup>

### 3.2 Personal interview

The same rules and guarantees apply as in the [Regular Procedure: Personal Interview](#). In particular, if the interview is omitted, decisions cannot be considered in accordance with the law, unless it concerns a medically established case of insanity or other mental disorder.<sup>339</sup> In practice, all asylum seekers are interviewed at least once to determine their eligibility for refugee or subsidiary protection (“humanitarian status”). Further interviews are usually only conducted if there are contradictions in the statements or if some facts need to be clarified.<sup>340</sup>

### 3.3 Appeal

The same rules and guarantees apply as in the [Regular Procedure: Appeal](#). Applicants can access one instance appeal within 7 days since serving the termination of procedure<sup>341</sup> or the refusal to open a subsequent procedure based on a submitted subsequent application<sup>342</sup> before the respective regional administrative court.

### 3.4 Legal assistance

The same rules and guarantees apply as in the [Regular Procedure: Legal Assistance](#), namely that legal aid for asylum seekers at all stages of the status determination procedure is provided under the national legislation, funded through the state budget.<sup>343</sup> In practice, due to insufficient funding, free legal aid at the administrative stage of the asylum procedure is only provided to vulnerable persons<sup>344</sup> upon their explicit request. Access to legal aid at the court stage is provided to all applicants who do not have sufficient means to cover their legal fees.

### 3.5 Suspension of returns for beneficiaries of protection

#### 3.5.1 Suspended returns to another EU Member State

No returns to another EU member state were ever suspended. This was the case also in 2025.<sup>345</sup>

#### 3.5.2 Relevant national jurisprudence

There is no national jurisprudence suspending returns of beneficiaries of international protection following inadmissibility decisions or finding applications admissible due to the impossibility to return beneficiaries of international protection to another EU member state or any other country, which granted the protection.

---

<sup>337</sup> Article 13(2) LAR.

<sup>338</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>339</sup> Article 63a (7) LAR in conjunction with Article 61a (5) LAR.

<sup>340</sup> Article 63a (5) LAR.

<sup>341</sup> Article 15 LAR.

<sup>342</sup> Article 84(2) LAR.

<sup>343</sup> Article 22(8) Law on Legal Aid.

<sup>344</sup> §1(17) from Additional Clauses LAR, namely: children, unaccompanied children, disabled, elderly, pregnant, single parents taking care of underage children, victims of trafficking, persons with serious health issues, psychological disorders or persons who suffered torture, rape or other forms of psychological, physical or sexual violence.

<sup>345</sup> SAR, reg. №АД-07-7 from 14 January 2025.

## 4. Border procedure (border and transit zones)

There is no border procedure in Bulgaria and Article 43 of the recast Asylum Procedures Directive has not been implemented at national level.

## 5. Accelerated procedure

### 5.1. General (scope, grounds for accelerated procedures, time limits)

The accelerated procedure is designed to examine the credibility of the asylum application, but also the likelihood of the application being fraudulent or manifestly unfounded.<sup>346</sup> The asylum application can also be found manifestly unfounded if the applicant did not state any reasons for applying for asylum related to grounds of persecution at all, or, if his or her statements were unspecified, implausible or highly unlikely. In the upcoming amendment of the national asylum law<sup>347</sup> following recommendations by the Commission, provided during the negotiations and implementation<sup>348</sup> of the EC-Bulgaria pilot project on accelerated procedure, both admissibility and accelerated procedure's grounds were re-worded<sup>349</sup> and reorganized in the text of the relevant national law to fully correspond to the respective provisions of the APD. However, these amendments were put aside in 2025 in the context of expected entirely new Law on Asylum and Refugees, which had to be adopted until 31 December 2025 (see, [Overview](#)).

In accordance with the transposition of Article 31(8) and 39 of the recast Asylum Procedures Directive, the asylum application can be found manifestly unfounded, if:

1. The applicant raised issues that are not relevant to the examination of whether he or she qualifies as a beneficiary of international protection;<sup>350</sup>
2. The applicant has made clearly inconsistent and contradictory, clearly false or obviously improbable representations which contradict country-of-origin information, thus making his or her claim clearly unconvincing;<sup>351</sup>
3. The applicant has misled the authorities by presenting false information or documents or by withholding relevant information or documents or destroying documents with respect to his or her identity and/or nationality;<sup>352</sup>
4. The applicant refuses to comply with an obligation to have his or her fingerprints taken;<sup>353</sup>
5. The applicant entered or resides the territory or stays lawfully and, without good reason, has not presented himself or herself within a reasonable time to the authorities to submit an application for international protection;<sup>354</sup>
6. The applicant entered the territory or stays unlawfully and, without good reason, has not presented himself or herself immediately to the authorities to submit an application for international protection as soon as possible;<sup>355</sup>
7. The applicant comes from a safe country of origin;<sup>356</sup>
8. The applicant arrives from a safe third country, provided that s/he will be accepted back to its territory<sup>357</sup>; which cannot be used as a sole ground for considering the application manifestly unfounded unless:

---

<sup>346</sup> Article 13(1) LAR.

<sup>347</sup> Law on Asylum and Refugees draft amendments, published for public consultations on 5 January 2024, available in Bulgarian at: <https://bit.ly/3TbGP8m>.

<sup>348</sup> SAR, Annual report on procedures for international protection in 2023, available in Bulgarian at: <https://bit.ly/3lgTCjm>.

<sup>349</sup> Articles 13 and 4 LAR.

<sup>350</sup> Article 13(1)(1)-(2) LAR.

<sup>351</sup> Article 13(1)(3)-(4) LAR.

<sup>352</sup> Article 13(1)(6)-(9) LAR.

<sup>353</sup> Article 13(1)(10) LAR.

<sup>354</sup> Article 13(1)(11) LAR.

<sup>355</sup> Article 13(1)(12) LAR.

<sup>356</sup> Article 13(1)(13) LAR.

<sup>357</sup> Article 13(1)(14) LAR.

- a. there is a connection between the applicant and the third country concerned on the basis of which it would be reasonable for that person to go to that country and, a case-by-case consideration is implemented of the safety of the country for a particular applicant; and,
  - b. the applicant is provided with a document informing the authorities of the third country, in the language of that country, that the application has not been examined in substance, or
9. The applicant is making an application merely in order to delay or frustrate the enforcement of an earlier or imminent decision which would result in his or her removal.<sup>358</sup>

The authority responsible for taking decisions at first instance on asylum applications in the accelerated procedure is the SAR, through caseworkers specially appointed for taking decisions in this procedure. The accelerated procedure is a non-mandatory phase of the status determination, applied only by a decision of the respective caseworker, if and when information or indications are available to consider the asylum application as manifestly unfounded.<sup>359</sup>

This decision should be taken within 14 working days from applicants' formal registration by the SAR. If the decision is not taken within this deadline the application has to be examined fully following the rules and criteria of the [Regular Procedure](#), with all respective safeguards and deadlines applied.

The law provides that, upon receiving the asylum application, caseworkers are obliged to request a written opinion from the State Agency for National Security (SANS) which, however, is to be taken into consideration if and when a decision on the substance of the claim is taken within the regular ("general") procedure.<sup>360</sup> The law explicitly provides that such an opinion should not be requested in the accelerated procedure.

All grounds are applied in practice. In 2025, the top 5 nationalities dealt under the accelerated procedure as manifestly unfounded applicants were Morocco (930 cases), Iraq (382 cases), Pakistan (73 cases), Algeria (54 cases) and Türkiye (51) cases.<sup>361</sup>

In 2023 a pilot project, initially funded by Austria and subsequently by the European Commission,<sup>362</sup> was implemented at SAR Pastrogor Transit centre near Bulgarian-Turkish border. Although the pilot project ended on 31 August 2023,<sup>363</sup> the SAR continued<sup>364</sup> to process applicants mainly from Morocco, Tunisia and Algeria, adding Egypt in 2024 and Iraq in 2025 among others, in this transit centre with their applications for international protection continued to be deemed manifestly unfounded in the majority of cases. (see [Applications and granting of protection status at first instance: 2025](#)).

## 5.2. Personal interview

### Indicators: Accelerated Procedure: Personal Interview

Same as regular procedure

1. Is a personal interview of the asylum seeker in most cases conducted in practice in the accelerated procedure?  Yes  No
  - ❖ If so, are questions limited to nationality, identity, travel route?  Yes  No
  - ❖ If so, are interpreters available in practice, for interviews?  Yes  No
2. Are interviews conducted through video conferencing?  Frequently  Rarely  Never

<sup>358</sup> Article 13(1)(15) LAR.

<sup>359</sup> Article 70(1) LAR.

<sup>360</sup> Article 58(10) LAR.

<sup>361</sup> SAR, reg. №ΠΟ-02-115 from 22 February 2026.

<sup>362</sup> European Commission, Press corner, The European Commission launches a pilot project with Bulgaria, 20 March 2023, available at: <https://bit.ly/3x3sPER>.

<sup>363</sup> See, AIDA Update on 2023.

<sup>364</sup> SAR, Periodic report on asylum procedure for the first trimester of 2024, available in Bulgarian [here](#).

The questions asked during interviews in the accelerated procedure aim at establishing facts relating to the individual story of the applicant, although in less detail in comparison with the interviews conducted during the regular procedure. Facts such as travel routes, identity and nationality are in principle exhaustively addressed prior to the accelerated procedure at the stages of registration and/or in the context of the Dublin procedure.

### 5.3. Appeal

#### Indicators: Accelerated Procedure: Appeal

Same as regular procedure

1. Does the law provide for an appeal against the decision in the accelerated procedure?

❖ If yes, is it

❖ If yes, is it suspensive

Yes

No

Judicial

Administrative

Yes

Some grounds  No

Appeals in the accelerated procedure have to be submitted within 7 calendar days (excluding public holidays) after notification of the negative decision, as opposed to the 14-calendar-day deadline in the [Regular Procedure: Appeal](#). Another major difference with the regular asylum procedure is related to the number of judicial appeal instances. In the accelerated procedure, there is only one judicial appeal possible, whereas in the regular procedure there are two appeal instances.

Lodging an appeal has automatic suspensive effect *vis-à-vis* the removal of the asylum seeker. The court competent to review first instance decisions in the accelerated procedure is the Regional Administrative Court of the county in which the appellant resides. The court has the obligation to ascertain whether the assessment of the credibility or the manifestly unfounded character of the claim is correct in view of the facts, evidence and legal provisions applicable. Asylum seekers have to be summoned for a public hearing and are asked to shortly present their reasons for fleeing their country of origin and seek protection elsewhere.

In general, asylum seekers do not face significant obstacles to lodging an appeal in the accelerated asylum procedure within the 7-day deadline. The obstacles referred to under the regular procedure appeal apply, e.g. lack of legal aid and interpretation issues.

### 5.4. Legal assistance

The same rules and guarantees apply as in the [Regular Procedure: Legal Assistance](#).

## 6. National protection statuses and return procedure

### 6.1. National forms of protection

The only other existing form of national protection status different from asylum, international and temporary protection is the possibility for regularization of unaccompanied children. Following a proposal by the Bulgarian Helsinki Committee<sup>365</sup> as a member of the expert working group convened for a revision of the national Law on Foreigners,<sup>366</sup> the latter was amended in April 2019 and entered into force in October of the same year to introduce a regularization ground for unaccompanied migrant children who have not claimed asylum or who have been finally rejected asylum, and therefore residing irregularly. The law envisages<sup>367</sup> that if the irregular unaccompanied migrant children entered the country alone, or was abandoned after entering the country's territory, they can apply for a long-term residence until reaching

<sup>365</sup> Council of Ministers, Draft Proposal for Amendment of the Law on Foreigners in the Republic of Bulgaria, 21 December 2018, available in Bulgarian [here](#).

<sup>366</sup> National Parliament, reg. № 902-01-5 from 19 February 2019, Law on Foreigners in the Republic of Bulgaria, St.G.№34 from 23 April 2019, enforced on 24 October 2019.

<sup>367</sup> Article 28a(1) LARB.

the age of majority. Once granted, the long-term residence can be extended<sup>368</sup> indefinitely after the age of majority on humanitarian grounds. Such grounds can be reasons which require, in their best interest, for the child to be admitted to or left to remain in the territory of the country.<sup>369</sup> The law however prohibits<sup>370</sup> family reunification to unaccompanied migrant children who have been granted such legal residence in both cases – prior or after reaching adulthood. In November 2019<sup>371</sup> the rules of this regularization procedure were also adopted and enforced. In immigration procedures, unaccompanied migrant children are legally represented by an appointed social worker<sup>372</sup> from the local child protection services of the Agency for Social Assistance. This regularization procedure aimed to provide additional legal safeguards mainly to unaccompanied children whose asylum application were finally rejected in order to secure their access to rights and services, e.g. accommodation, health care, access to education, etc., which otherwise would be either seriously compromised or fully inaccessible. Until 2025, this regularization procedure has not been applied in practice. Among others, the main reason was and still is the high absconding rate of unaccompanied children who reach the country (see, 4. Legal representation of unaccompanied children) as well as the fact that the majority of unaccompanied children arriving are within 16-17 years of age group<sup>373</sup> and they reach adulthood prior, or shortly after their final rejection as applicants for international protection. However, in April 2025 the non-governmental organization Bulgarian Helsinki Committee in cooperation with UNICEF achieved the first ever regularization of a finally rejected unaccompanied 15 years old boy from Iraq<sup>374</sup>, although the immigration authorities refused to alleviate or waive the required government fee for the regularization, notwithstanding his age, vulnerability and socioeconomic status.

## 6.2. Return procedure

Under the general immigration law LARB return orders are issued automatically to any migrant at the very moment of their identification as in irregular stay.<sup>375</sup> Therefore, the overwhelming majority of the asylum seekers in Bulgaria apply for asylum after they have been apprehended by the police<sup>376</sup> upon entry, exit or inside the country's territory, and served a return order. The LARB envisages<sup>377</sup> that a return or expulsion order can be issued by the police authorities – border, immigration or regular police -, or the State Agency for the National Security (SANS). Presently, the asylum agency SAR does not have competence to issue return orders. If a return order is issued to an applicant prior the submission of his asylum application or during the asylum procedure, its implementation is automatically suspended by virtue of the law (*ex lege*) until the asylum procedure is completed with a final decision.<sup>378</sup> If this decision is granting asylum the return order is again automatically considered revoked by the virtue of the law.<sup>379</sup> The asylum law LAR explicitly envisage<sup>380</sup> that when applicants whose decision for a refusal, cessation or exclusion from asylum, or termination of the procedure has become final should be considered falling within the scope of the general immigration law, rules and procedures. The asylum agency (SAR) has an obligation to inform police authorities that a certain applicant is no longer under the protection of the asylum law.

In general, the national return rates are not significant. In 2025, the MOI returned 1,359 migrants while during the previous years the implemented returns were, respectively: 1,015 returned migrants in 2024;

---

<sup>368</sup> Article 28a(2) LARB.

<sup>369</sup> §1(16) LARB.

<sup>370</sup> Article 28a(6) LARB.

<sup>371</sup> Article 63l of the LARB Regulations.

<sup>372</sup> Article 7a LARB.

<sup>373</sup> 2025: 75% (428 unaccompanied children) in 16-17 age group, 20% (117 unaccompanied children) in 14-15 age group, and 5% (28 unaccompanied children) in 0-3 age group.

<sup>374</sup> Bulgarian Helsinki Committee, Monthly Child Protection report, 5 May 2025.

<sup>375</sup> Article 41 LARB.

<sup>376</sup> Bulgarian Helsinki Committee, 2024 Annual RSD Monitoring report, 31 January 2025, available in Bulgarian at: <https://bit.ly/3SX3ST7>: 12,250 asylum seekers vs. 10,182 persons (83%) apprehended by the MOI.

<sup>377</sup> Article 44(1) LARB.

<sup>378</sup> Article 67(1) LAR

<sup>379</sup> Article 67(2) LAR.

<sup>380</sup> Article 66 LAR.

565 returned migrants in 2023, 582 returned migrants in 2022, 770 returned migrants in 2021 and 428 returned migrants in 2020.<sup>381</sup>

## D. Guarantees for vulnerable groups

### 1. Identification

#### Indicators: Identification

1. Is there a specific identification mechanism in place to systematically identify vulnerable asylum seekers?  Yes  For certain categories  No
2. Does the law provide for an identification mechanism for unaccompanied children?  Yes  No

Applicants who are children, unaccompanied children, disabled, elderly, pregnant, single parents taking care of underage children, victims of trafficking, persons with serious health issues, psychological disorders or persons who suffered torture, rape, or other forms of psychological, physical or sexual violence are considered as individuals belonging to a vulnerable group.<sup>382</sup>

#### 1.1 Screening of vulnerability

Several initiatives on vulnerability were undertaken in previous years. In 2008, the SAR and UNHCR agreed on standard operating procedures (SOPs) to be followed with respect to treatment of victims of Sexual and Gender-based Violence (SGBV).<sup>383</sup> The SOPs were never applied in practice. A process for the revision of the SOPs has been pending since the end of 2013, which also aims to include new categories or vulnerable groups.<sup>384</sup> The revision of SGBV SOPs ended in December 2021 with their formal adoption by the SAR.<sup>385</sup> However, they were neither communicated to SAR staff working on the field, nor implemented in practice.<sup>386</sup> In its reply<sup>1</sup> to the findings of this report the SAR stated that in 2025, there was one reported case of violence against a child by the dissemination of photos of a girl by an adult at the Harmanli RRC, and the Social Assistance Directorate, the Ministry of Interior, and State Agency for Child Protection were notified about this case. However, the SAR did not provide the outcome of the notification and any measures taken, if any.

EUAA (formerly EASO), also cooperated with Bulgaria in order to improve the capacity to identify and refer vulnerable applicants and to improve exchange between relevant institutions. EASO's Special Support Plan to Bulgaria was originally in place from December 2014 until June 2016 but was extended until 31 October 2018.<sup>387</sup> The identification and referral mechanism was set to build on the Quality tool for the Identification of Persons with Special Needs (IPSN).

In 2020, amendments to the law introduced a mandatory vulnerability assessment implemented by the SAR social experts with their vulnerability reports and recommendations referred to the case workers in order these circumstances to be taken into account in the decision-taking process. The SAR internal rules foresee that these two documents have to be added to the personal file to enable case worker to take them into account when examining the application. These activities have to be implemented also in the

<sup>381</sup> MOI statistics, available in Bulgarian [here](#).

<sup>382</sup> §1(17) Additional Provisions, LAR.

<sup>383</sup> Standard Operating Procedures on sexual and gender-based violence, reg. No 630, 27 February 2008.

<sup>384</sup> UNHCR, SGBV Task Force, established on 15 February 2014.

<sup>385</sup> Reg. No. ЦД-172/и/23.12.2021 approved with resolution by SAR Chairperson.

<sup>386</sup> Bulgarian Helsinki Committee, 2022 Annual RSD Monitoring Report, published on 1 March 2023, available at: <https://bit.ly/3Jkd3t0>.

<sup>387</sup> EASO, Special support plan to Bulgaria – Amendment No.3, 27 October 2017, available at: <https://bit.ly/2U58pCF>; 'EASO successfully completes its special support in Bulgaria', 27 November 2018, available at: <https://bit.ly/2S9FwUQ>.

cases when the vulnerability or the special needs are established at a later stage of the asylum procedure. Additionally, an early identification questionnaire was created for applicants who experienced traumatising experiences in order to determine their special needs and to facilitate the referral to adequate psychological or medical care.<sup>388</sup>

In 2025, both vulnerability assessment and identification, but most of all follow-ups on identified cases, remained substandard, to the point this continued to represent the most significant violation of existing obligation in the context of the asylum procedure in the course of already several years.<sup>389</sup> SAR social workers conducted a total of 273 vulnerability assessments and identified 115 applicants<sup>390</sup> with vulnerabilities or specific needs. SAR acknowledged<sup>391</sup> to have dealt with 1,127 applicants with vulnerabilities as defined by the law in 2025 (see, the Table [Asylum seekers identified as vulnerable in Bulgaria: 2018-2025](#)). These figures obtained through monitoring indicated that just 24% of all asylum applicants with vulnerabilities received proper assessments of their needs. Moreover, SAR affirms<sup>392</sup> that the social experts who carry out the vulnerability assessment do file their assessments and support plans in the case management registry for the case worker to be able to review and collect them into the respective individual file, while copies of these documents remain with the social experts for subsequent work with the vulnerable person, according to the planned activities. In 2025, the monitoring of these processes established<sup>393</sup> that in 88% of the cases, an initial assessment form was present in the file of asylum seekers who were falling within the vulnerability definition under national law.<sup>394</sup> Thus, vulnerability assessment and support plans were still missing in 12% of the monitored cases of asylum seekers, who otherwise should have been assessed and supported as persons with specific needs or vulnerabilities. The subsequent support plan, however, was present in just 20% of the cases, and in 100% of them no information was available on whether any of the support measures, included in the plan were actually implemented. Therefore, in 2025 needs assessment as well as planning and provision of support measures with respect to applicants with identified vulnerabilities were still carried out unsystematically. In its reply<sup>1</sup> to the findings of this report the SAR stated that it took all necessary measures to meet the specific needs of persons from vulnerable groups, where all individuals from vulnerable groups were accompanied to medical facilities with interpretation and transport provided. The SAR also stated that where treatment was required outside the coverage of the National Health Insurance Fund (NHIF), assistance was sought from NGOs for funding, and there were also cases where the staff from reception centers purchased medicines for children and individuals. The SAR pointed out two examples in 2025 in this respect, namely, of a person with a physical disability from Ovcha Kupel shelter who was placed in a specialized residential care, and another case of a person with a mental disorder from Voenna Rampa shelter, to whom SAR purchased medications under its budget.

The most serious violation in this respect continued to affect unaccompanied children's files continue in many cases to lack the mandatory BID reports<sup>395</sup>. Under the law,<sup>396</sup> their best interest assessment and individual social report ought to be implemented by the statutory social workers from child protection services of the Agency for Social Assistance (ASA). In 2025, monitoring found that in 100%, a form for a rapid assessment was attached to the child's file, but only in 15% the required follow-up full assessment was available, representing a serious systemic deterioration in comparison with the previous 2024, when a full assessment was made in 50% of cases, but particularly compared to 2023, when a full assessment was carried out in 61% of cases. The mandatory social reports with needs assessment were present in

---

<sup>388</sup> Early Identification and Needs Assessment form (ФИОН), Individual Support and Referral Plan form (ФИПП) and Social Consultation form (ФСК).

<sup>389</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>; see, also AIDA 2024 and 2023 Country Updates.

<sup>390</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>391</sup> Ibid.

<sup>392</sup> Ibid.

<sup>393</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

<sup>394</sup> §1(17) Additional Provisions, LAR.

<sup>395</sup> Articles 16-18 Law on Social Support's Regulations.

<sup>396</sup> Article 15(6) Law on Child Protection.

just 46% of the monitored children's files in 2025.<sup>397</sup> In 20% of the cases (1 out of 5 casefiles) the social reports were entirely generic and formal, without any real risk or best interest assessment regarding the case of the child concerned. In addition, the mandatory plan for necessary measures to adopt in the specific case was not established in any (0%) of the monitored cases. If properly prepared and communicated, these social reports could play a vital role not only in the asylum procedure, but also after it to outline the measures which need to be taken with respect to the child depending on the outcome of the procedure – rejection or recognition. The failure of the statutory child protection services to implement this basic safeguard vis-à-vis unaccompanied asylum seeking and refugee children have continued for over a decade.<sup>398</sup>

Although moderate, the efforts made for the vulnerability identification resulted in a notable increase in the absolute number of asylum seekers formally recognised to have special needs or vulnerabilities. While this concerned 797 asylum seekers in 2019; 1,259 in 2020, 3,928 asylum seekers in 2021 and 5,482 asylum seekers in 2022, 6,155 asylum seekers in 2023, and 4,136 asylum seekers in 2024. In 2025, this number dropped to 1,127 asylum seekers, or 29% of asylum applicants on the backdrop of a 68% decrease in the overall number of new applicants throughout the year.<sup>399</sup> However, it has to be noted that 89% of them were children (573 unaccompanied children and 426 accompanied children), i.e. cases where the vulnerability identification is straightforward and almost automatic as it derives from the child's statement about his or her age, or from the identity documents, if available.

The SAR collects statistics on the number of asylum seekers identified as vulnerable at the end of any given month rather than cumulative data on the number of vulnerable persons applying for asylum in a given year. At the end of December 2025, the following vulnerable groups were identified among asylum seekers:

Asylum seekers identified as vulnerable in Bulgaria: 2018-2025								
Category of vulnerable group	2018	2019	2020	2021	2022	2023	2024	2025
Unaccompanied children	52	524	799	3,172	3,483	3,843	2,601	573
Accompanied children	n.a.	207	326	561	1,793	1,877	1,420	426
Single parents	16	20	28	57	69	130	35	17
Pregnant women	0	8	18	34	24	34	5	20
Elderly persons	3	4	0	15	108	30	25	10
Disabled persons	3	10	20	21	42	54	13	11
Persons with chronic or serious illnesses	19	13	42	52	72	147	26	57
Persons with serious psychiatric issues	0	8	24	12	15	31	2	8
Victims of physical, psychological or sexual violence	6	3	2	3	5	3	1	4
Other (LGTBI)	n.a.	n.a.	n.a.	1	2	6	8	0
Victims of trafficking	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	1
<b>Total</b>	<b>99</b>	<b>797</b>	<b>1,259</b>	<b>3,928</b>	<b>5,482</b>	<b>6,155</b>	<b>4,136</b>	<b>1,127</b>

Source: SAR.

NGOs continue to play key role in early identification and assessment of applicants' vulnerability and their referral and according treatment. Organisations specialise in specific groups and issues, namely: poverty,

<sup>397</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

<sup>398</sup> Bulgarian Helsinki Committee, 2012 Annual Refugee Status Determination Monitoring Report, 31 January 2013, available at: <https://bit.ly/49TvJdp>.

<sup>399</sup> SAR, reg. №АД-07-7 from 14 January 2025.

destitution and social inequality (Red Cross; Council of Refugee Women, Caritas Sofia); health issues and disabilities (Red Cross); mental and psychological problems (Animus, Nadya Centre, replacing ACET which ceased activities at the end of 2016), domestic abuse (Bulgarian Gender Research Foundation, Mission Wings) and unaccompanied children (Bulgarian Helsinki Committee).

## 1.2 Age assessment of unaccompanied children

The caseworker is not obliged to request an age assessment unless there are doubts as to whether the person is a child.<sup>400</sup> In practice, age assessment is used only to disprove asylum seekers declaring being underage.

The law does not state the method of the age assessment which should be applied. As a rule, the wrist X-rays method is applied systematically in all cases, based on the assumption that this method is more accurate than a psycho-social inquiry. The Supreme Administrative Court, however, considers this test as non-binding and applies the benefit of the doubt principle,<sup>401</sup> which is also explicitly laid down in the LAR.<sup>402</sup>

The age assessment cannot be contested by means of a separate appeal to the one lodged against a potential negative decision. Therefore, if a positive decision is issued, but the age is wrongly indicated to be 18 years or above, the decision cannot be appealed on that account as a part of the status determination process and the child granted the protection will be treated as an adult. The sole legally available option in such case is to initiate lengthy and usually costly civil proceedings to establish the actual age, but unless documentary or other irrefutable evidence is provided these proceedings generally have negative results.

In December 2023 a bilateral Age Assessment Instruction,<sup>403</sup> was formally adopted by SAR and State Agency for Child Protection (SACP) and published in December 2023. The instruction, entered into force on 1 March 2024, introduced a structured multi-disciplinary age assessment rules and procedures and is the first ever formally adopted one in the European context. The Age Assessment Instruction was widely endorsed by all national stakeholders, including UNHCR and UNICEF.<sup>404</sup>

In 2025, the SAR implemented just 2 age assessments. However, the asylum agency continued to use equally X-ray medical age assessment, which was conducted as a sole assessment method in 1 (50%) of the cases, where in the other one of them (50%) the SAR applied the non-medical method of assessment. Under the Age Assessment Instruction,<sup>405</sup> the medical assessment ought to be conducted only if and when the non-medical ones failed to reach a conclusion about the age of the applicant. 1 non-medical assessment was conducted by the SACP's age assessment teams in 2025, all of them concluding applicants to be underage. Thus, despite the adoption of the instruction, the SAR continued to conduct the age assessment by means of X-ray expertise of the wrist bone structure and without any evidence of prior consent by the children's representatives.<sup>406</sup> Reports from medical organisations consider the X-ray as invasive but, more importantly, inaccurate with an approximate margin of error of 2 years.<sup>407</sup>

---

<sup>400</sup> Article 61(2) LAR.

<sup>401</sup> Supreme Administrative Court, Decision No 13298, 9 November 2009.

<sup>402</sup> Article 75(3) LAR.

<sup>403</sup> State Agency for Refugees, Instruction on the Rules and Conditions on Age Assessment, published on 1 December 2023, available in Bulgarian [here](#).

<sup>404</sup> State Agency for Refugees, ДАБ при МС и ДАЗД въвеждат първата инструкция за определяне възрастта на непридружените деца-бежанци в България, published on 22 December 2023, available in Bulgarian at: <https://bit.ly/3OZmqAF>.

<sup>405</sup> Article 9(1) of the Age Assessment Instruction.

<sup>406</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>407</sup> Doctors of the World, Age assessment for unaccompanied minors, 28 August 2015. See also UNHCR, UNICEF and International Rescue Committee, The way forward to strengthened policies and practices for unaccompanied and separated children in Europe, July 2017, available at: <http://bit.ly/2BHGXLo>.

## 2. Special procedural guarantees

### Indicators: Special Procedural Guarantees

1. Are there special procedural arrangements/guarantees for vulnerable people?  Yes  For certain categories  No  
❖ If for certain categories, specify which: Unaccompanied children

In 2025 a needs assessment was carried out in 88% of the cases,<sup>408</sup> with an initial assessment form included in the case file of asylum seekers falling within the vulnerability definition under national law.<sup>409</sup> However, vulnerability assessment and support plans were still missing in 12% of the monitored cases of asylum seekers<sup>410</sup>, who otherwise should have been assessed and supported as persons with specific needs or vulnerabilities. The subsequent support plan was present in just 20% of the cases, and in 100% of them no information was available whether any of the support measures, included in the plan were actually implemented or not. Therefore, in 2025 needs assessment as well as planning and provision of support measures with respect to applicants with identified vulnerabilities were still carried out unsystematically. It also means that due to the missing or misplaced vulnerability assessment documents the case workers were unable to properly account their specific situation when determining the asylum application. Therefore, these circumstances could be easily omitted and not taken into consideration by caseworkers in their decision-making process. In its reply<sup>1</sup> to the findings of this report the SAR stated that the absence of a support plan in individual files did not mean that such plans have not existed as sometimes they were kept in the SAR registry office and only later added to the individual file. However, it has to be noted that the findings relating the missing support plans were based on monitoring of SAR decisions that had already entered into force,<sup>411</sup> and therefore there was no other procedural stage when a support plan, if such existed, could be joined into the individual file.

The law excludes the application of the **Accelerated Procedure** to unaccompanied asylum-seeking children, but not to torture victims.<sup>412</sup>

Despite the 2015 reform of the law which stripped the statutory social workers of the child protection services from the responsibility to represent unaccompanied children in asylum procedures (see **Legal Representation of Unaccompanied Children**), their obligation to provide a social report with an opinion on the best interests of the child concerned in every individual case remains nonetheless under the provisions of general child care legislation.<sup>413</sup> In 46% of the cases monitored in 2025, these reports were either not produced, or not communicated to the SAR's caseworkers for further consideration.<sup>414</sup> In addition, just 17% of interviews with unaccompanied children were conducted in the presence of the statutory social worker from the Child Protection Department of the Agency for Social Assistance (ASA). Only in 33% of the cases the statutory social workers of the ASA have carried out any intervention during the interview they attended, while in the remaining 67% of the cases their presence has been without any actions, participation or intervention carried out to clarify the case or support the child.<sup>415</sup>

At the end of 2017, the National Legal Aid Bureau - the national body assigned to provide state sponsored legal aid, - received funding under the AMIF national programme to commence for the first time ever in Bulgaria the provision of legal aid to asylum seekers during the administrative phase of the asylum procedure.<sup>416</sup> Legal aid under this 80,000 € pilot project was implemented until 31 January 2021 and was

<sup>408</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

<sup>409</sup> §1(17) Additional Provisions, LAR.

<sup>410</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

<sup>411</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

<sup>412</sup> Article 71(1) LAR.

<sup>413</sup> Article 15(4) and (6) Law on Child Protection.

<sup>414</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

<sup>415</sup> Ibid.

<sup>416</sup> National Legal Aid Bureau, 'Обява за конкурс за адвокати за работа по проект', 29 January 2018, available in Bulgarian at: <http://bit.ly/2DP376C>.

limited to the vulnerable applicants for international protection.<sup>417</sup> The project was extended until 31 July 2021 (see [Regular Procedure: Legal Assistance](#)). After the end of the project, the National Legal Aid Bureau agreed to continue representing vulnerable applicants under its general rules, which would require the asylum seekers to fill in and submit complicated legal aid applications. The non-governmental organisation Bulgarian Helsinki Committee funded by UNHCR assisted the NLAB with the adaptation and translation of the legal aid forms in English, French, Russian, Arabic, Farsi, Dari, Pashto, Urdu, Kurdish and Turkish languages in order to enable the access to legal aid of vulnerable applicants. A problem persists, however, for those who are illiterate and where the assistance of case workers is the only way to get access to legal aid. Yet, some of them are reluctant to grant access to legal aid as it would mean that their role in and quality of the procedure would be assessed. Similar to previous years, in 2025 legal aid was not provided to any other vulnerable asylum seekers at first instance apart for unaccompanied children.<sup>418</sup> This represents a deterioration in comparison to 2021, when 50 asylum seekers were provided legal aid, and 2020, when 818 asylum seekers were provided aid.<sup>419</sup> Other asylum seekers, i.e. who are not considered as vulnerable, did not enjoy access to legal aid at the first instance of the asylum procedure.

In 2022, the Minister of Labour and Social Policy approved<sup>420</sup> a coordination mechanism for interaction between the authorities and organisations working on cases of unaccompanied migrant children separated from their families in Bulgaria, including children seeking and/or receiving international or temporary protection.<sup>421</sup> However, this coordination mechanism was neither endorsed, nor signed by any other ministry or government agency, including SAR, therefore it is not formally binding or applied in practice, except by SAR, which indicated<sup>422</sup> to be applying in practice some of the Coordination mechanism's provisions when registering unaccompanied children.

### 3. Use of medical reports

#### Indicators: Use of Medical Reports

1. Does the law provide for the possibility of a medical report in support of the applicant's statements regarding past persecution or serious harm?  Yes  No  In some cases
2. Are medical reports taken into account when assessing the credibility of the applicant's statements?  Yes  No

The LAR includes a provision, according to which the caseworker, with the consent of the asylum seeker, can order a medical examination to establish evidentiary statements of past persecution or serious harm.<sup>423</sup> If consent is refused by the asylum seeker, this should not be an impediment to issuing the first instance decision. The law also envisages that the medical examination can be initiated by the asylum seeker, but in this case he or she should bear the medical expert's cost.

However, such reports are only exceptionally commissioned by SAR caseworkers. In most cases where medical reports were provided - if not all - this was at the initiative of the asylum seeker or his or her legal representative. The costs of such medical reports are covered by legal aid, which is awarded in the majority of cases which concern vulnerable applicants. If no legal aid is awarded, the costs of the medical report are borne by the asylum seeker.

The law only requires the caseworker to order a medical examination in one particular case, which is when there are indications that the asylum seeker might be mentally ill.<sup>424</sup> In this case, if the result of the medical examination report shows that the asylum seeker suffers from a disease or mental illness, the caseworker approaches the SAR's Chairperson, who refers the case to the court for appointment of a

<sup>417</sup>

Ibid.

<sup>418</sup>

SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>419</sup>

SAR, reg. №РД05-40 from 16 January 2023.

<sup>420</sup>

Ministry of Labour and Social Policy (MLSP), Order №РД-06-6 from 18 April 2022.

<sup>421</sup>

MLSP, Order No. RD-06-6 of 18 April 2022.

<sup>422</sup>

SAR 123rd Coordination meeting, held on 1 June 2023.

<sup>423</sup>

Article 61a(7) LAR.

<sup>424</sup>

Article 61a(5) LAR.

legal guardian to the asylum seeker which is required to be able to continue with the examination of the asylum application.

#### 4. Legal representation of unaccompanied children

##### Indicators: Unaccompanied Children

1. Does the law provide for the appointment of a representative to all unaccompanied children?  
 Yes  No

Since 2015, local municipalities are mandated to act as legal representatives of unaccompanied children.<sup>425</sup> Highly criticised when adopted, this approach proved to be more inadequate than previous arrangements. The municipalities lacked not only qualified staff, but also basic experience and expertise in child protection.<sup>426</sup> In addition to that, the number of legal representatives appointed – one or two per reception facility – was insufficient to meet the need of the population of unaccompanied children who, remained considerable in number.

At the end of 2020, amendments to the law introduced a major change in the legal representation of unaccompanied asylum seeking and refugee children.<sup>427</sup> The obligation to represent these children not only in the procedure, but also after the recognition and before all agencies and institutions regarding their rights and entitlements, was shifted from the municipalities to the National Legal Aid Bureau. It includes requirements related to the qualification of the appointed legal aid lawyers and representation implemented in the child's best interest.<sup>428</sup> It aimed at addressing the absence of guardians and ensure proper legal representation and care for the best interests of unaccompanied children in asylum procedures to mitigate high rates of absconding and related protection and safety risks.

Starting from July 2021, 16 lawyers from the Sofia Bar, 8 lawyers from Haskovo Bar and 3 lawyers from Sliven Bar began implementing the representation of unaccompanied asylum seeking and refugee children. In December 2023, UNHCR supported NLAB with training for legal aid lawyers vis-à-vis the planned expansion of the limited list of Article 25 representatives. In February 2024, NLAB recruited 20 additional lawyers (18 in Sofia and 2 in Haskovo) with a follow-up training, also organized and funded by UNHCR, held in December 2024. In December 2025, UNHCR held another training in cooperation with NLAB and Center for Continuing Education of the National Bar Association for legal practitioners, including Article 25 representatives. In April 2025, the non-governmental organisation Bulgarian Helsinki Committee communicated its second annual report covering the year of 2024, which assessed the quality of the representation provided by Article 25 legal aid lawyers. The general feedback from children continued to remain predominantly positive with respect to legal aid lawyers acting in Sofia reception centres, while it was mainly negative with respect to legal aid lawyers acting in Harmanli reception centre, with main concern related to required additional payment in violation of the law<sup>429</sup>. The next report, due in April 2026 has to provide both general findings about the overall quality of the legal representation as well as individual assessment of acting legal aid lawyers. This report and monitoring are based on a formal agreement<sup>430</sup> between the Ministry of Justice and UNICEF; however, it will not be conducted in 2026 due to financial constraints. On 14 March 2024 the NLAB Executive Committee decided that quality assessments of legal aid providers ought to be introduced in the law in order to allow striking of underperforming representatives out of the limited Article 25 list. Such amendments had been already proposed and included in the draft law, submitted by SAR in February 2024,<sup>431</sup> however the draft never made to the Parliament due to the continued constitutional crisis experienced by the country since mid-

<sup>425</sup> Former Article 25(1) LAR.

<sup>426</sup> Bulgarian Helsinki Committee, 2012, 2013, 2015 and 2016 Annual Refugee Status Determination Monitoring Reports, available at: <https://bit.ly/49TvJdp>.

<sup>427</sup> National Parliament, Amendments on the Law on Asylum and Refugees (LAR), State Gazette No.89 from 16 October 2020, available at: <https://bit.ly/2LoUMiG>.

<sup>428</sup> Article 25 LAR.

<sup>429</sup> Bulgarian Helsinki Committee/UNICEF, Monthly Progress Report on child protection, 10 January 2024.

<sup>430</sup> Memorandum of Understanding and Cooperation between Ministry of Justice of the Republic of Bulgaria and the United Nations Children's Fund (UNICEF), signed on 19 September 2024.

<sup>431</sup> SAR, reg.NoLJY-04-408 from 14 February 2024.

2022. The national plan for the EU Migration and Asylum Pact's Implementation<sup>432</sup> adopted on 19 December 2024 envisaged a revision of the ordinance's provisions to make them correspond to the Pact's rules and procedures with a deadline for these amendments set for December 2025. Such amendments however were not formally adopted until 31 December 2025. (see, [Overview](#))

In the past, the SAR used to significantly delay the notification to the National Legal Aid Bureau of the necessity to appoint a representative, reaching a period longer than 1 month in certain cases.<sup>433</sup> As a result, unaccompanied children left without a representative had no access to credible information on the asylum procedure and their rights, especially the right to be legally transferred under the Dublin III Regulation to other EU countries to reunite with their family members. In 2022 however, the practice in this respect improved significantly. NLAB agreed<sup>434</sup> with SAR to provide the latter with access to its automated individual database, which could be used not only to send an immediate notification by SAR to NLAB about requested new representative's appointments but also allowing the SAR to obtain immediately and directly information about the appointed representative. However, in 2025 the appointment of a representative to unaccompanied children decreased to 3 calendar days on average following the registration of the children, for making the request by SAR to NLAB, and 5 calendar days on average by NLAB to appoint the representative and send back the appointment information to the SAR.<sup>435</sup> In total, NLAB appointed a legal aid representative for 97% (553 out of all 573) of the unaccompanied children who applied for asylum in that year. This was improvement in comparison to 2024, when a legal aid representative was appointed for 91%<sup>436</sup> of the children (2023: 72% of the children). However, the representation of 845 of these children was discontinued due to their abandonment of the procedure and absconding the country<sup>437</sup>. Therefore, just 181 unaccompanied asylum-seeking children were represented by NLAB legal aid lawyers from start to end of their status determination<sup>438</sup>.

The immediate and written provision of information to unaccompanied children regarding the appointment of the respective representative and their contact details is a legal obligation of the SAR.<sup>439</sup> Fully omitted until the very end of 2021, when such information began to be partially provided in Ovcha Kupel and Voenna Rampa safe-zones, in 2025 in 99% of the relevant cases monitored, children were duly and timely informed about the appointment of their representative.<sup>440</sup> This represented an improvement in comparison to the 2024 practice, when 91% of unaccompanied children were duly provided this information, respectively 81% in 2023, and 96% in 2022.<sup>441</sup>

Since mid-2022 the SAR has been actively searching for opportunities to accommodate unaccompanied children in licensed family-type children's centres (ЛHCT). During the procedure such efforts were undertaken with regard mainly to minor asylum-seeking children, children with special needs or such identified as being at increased risk of trafficking or harm. After the recognition, these efforts targeted all unaccompanied children, excluding those in family reunification procedures, who were allowed to wait the reunification with their parents or other family members in SAR reception centres.<sup>442</sup> As a result of this positive practice, throughout 2025, 41 unaccompanied children were accommodated in specialized childcare centres. Out of the total, 11 were asylum seeking children and 30 children who had been granted international protection.<sup>443</sup> In this respect, it can be noted that the children positively impacted by these

---

<sup>432</sup> COM №883 from 19 December 2024, available in Bulgarian [here](#).

<sup>433</sup> Bulgarian Helsinki Committee, 2021 Annual RSD Monitoring Report, available at: <https://bit.ly/3Ad4wlt>.

<sup>434</sup> Teleconference with NLAB Chair Natalia Ilieva on 22 December 2022.

<sup>435</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

<sup>436</sup> 2024: 2,392 out of all 2,601 unaccompanied children appointed legal aid and representation.

<sup>437</sup> Including backlog cases, pending from 2024.

<sup>438</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

<sup>439</sup> Article 25(5) LAR.

<sup>440</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Report, 31 January 2026, available in Bulgarian at: <https://bit.ly/3SX3ST7>.

<sup>441</sup> Bulgarian Helsinki Committee, 2024, 2023 and 2022 annual RSD reports, available at: <https://bit.ly/3SX3ST7>.

<sup>442</sup> SAR, Rules and procedures on the accommodation of unaccompanied children granted international protection in foster families, social or integrated socio-medical care facilities for children of a residential type, adopted in October 2022.

<sup>443</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

measures continued to gradually increase<sup>444</sup> with more of them able to benefit by this type of accommodation compared to previous years. Altogether thirteen licensed childcare centres have engaged in this practice in localities across the country, namely in Sofia, Burgas, Vidin, Ruse, Kardzhali, Novo Selo and Zvanichevo. At the same time the lack of specialized training of the childcare centre's staff to work with unaccompanied children seeking or granted protection should be acknowledged and taken into account as well as the lack of secured interpretation at least for the initial period of accommodation and adjustment.

The number of unaccompanied child applicants continued to decrease to 573 in 2025, compared to 2,601 in 2024; 3,843 in 2023; 3,483 in 2022; 3,127 in 2021; 799 in 2020; 524 in 2019; 481 in 2018; 440 in 2017 and 2,772 in 2016:

Unaccompanied asylum-seeking children: 2025	
Country of origin	Number
Algeria	1
Congo	1
Egypt	75
Morocco	31
Senegal	1
Tunisia	3
Afghanistan	257
Iran	35
Iraq	105
Pakistan	5
Syria	58
Stateless	1

Source: SAR.

Out of all unaccompanied children whose asylum claims were assessed on the merits in 2025, none was recognised as a refugee, 20 were granted subsidiary protection, 161 were refused protection and 845 children absconded prior to being notified the decision, and therefore their procedures were terminated.

Hence, despite unaccompanied children being better informed about their rights and the asylum procedure, the vast majority (82%) still abandoned the asylum procedure and moved irregularly to the countries of their destination.<sup>445</sup>

## E. Subsequent applications

### Indicators: Subsequent Applications

1. Does the law provide for a specific procedure for subsequent applications?  Yes  No
2. Is a removal order suspended during the examination of a first subsequent application?
  - ❖ At first instance  Yes  No
  - ❖ At the appeal stage  Yes  No
3. Is a removal order suspended during the examination of a second, third, subsequent application?
  - ❖ At first instance  Yes  No
  - ❖ At the appeal stage  Yes  No

<sup>444</sup> Ibid., 2022: 26 children (2 asylum seeking and 24 granted protection); 2023: 43 children (2 asylum seeking and 41 granted protection); 2024: 62 children (4 asylum seeking and 58 granted protection).

<sup>445</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

The law provides, in line with the opportunity laid out by the recast Asylum Procedures Directive, to consider subsequent applications as inadmissible based on a preliminary examination of whether new elements or findings have arisen or been presented by the applicant relating to their personal situation or country of origin.<sup>446</sup> The inadmissibility assessment can be conducted on the sole basis of written submissions without a personal interview. The national arrangements, however, do not envisage exceptions to this rule as established in the recast Asylum Procedures Directive.<sup>447</sup>

Within the hypotheses adopted in national legislation, subsequent applications are not examined and the applicants are stripped from the right to remain when it is considered that the first subsequent application was submitted merely in order to delay or frustrate the enforcement of a removal decision; or where it concerns another subsequent application, following a final inadmissibility / unfounded decision considering a first subsequent application.

If the subsequent application is declared inadmissible within the preclusive 14 working days deadline, this decision can be appealed within a deadline of 7 days. The appeal has no suspensive effect; however, the court is obligated *ex lege* to consider whether the appellant should remain in the country until the judgement is delivered.<sup>448</sup> The competent court is the territorially competent regional administrative court,<sup>449</sup> which hears the appeal case in one instance. If the court rules the admission of the subsequent application, the SAR has to register the applicant within 3 working days from the date the admission has taken place (entered into force).

In 2025, 430 asylum seekers in total submitted subsequent applications. Out of them, 400 (93%) were declared inadmissible and 30 (7%) were granted access to further determination. A breakdown per country of origin is as follows:

Subsequent applications: 2025	
Country of origin	Number
Syria	361
Russian Federation	10
Nigeria	7
Haiti	2
Stateless	2
Iraq	14
Venezuela	2
Serbia	1
Lebanon	1
Jordan	1
Côte d'Ivoire	1
Pakistan	1
Uzbekistan	1
Iran	2
Türkiye	3
Tunisia	2
Morocco	4
Moldova	1

<sup>446</sup> Articles 75a to 76c LAR; Article 76d in conjunction with Article 13 (2) LAR.

<sup>447</sup> Article 42(2)(b) recast Asylum Procedures Directive.

<sup>448</sup> Article 84(6) LAR.

<sup>449</sup> Article 84(2) LAR.

Yemen	2
Algeria	1
Bangladesh	4
Israel	1
Afghanistan	4
Tajikistan	1
Congo	1

Source: SAR.

Subsequent applications supported by individualised evidence have been admitted to determination at the first instance. Albeit encouraging, this approach of the SAR can still not be considered as a common practice.

## F. The safe country concepts

### Indicators: Safe Country Concepts

- |  |   |
|--|---|
| 1. Does national legislation allow for the use of “safe country of origin” concept?  | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is there a national list of safe countries of origin?                              | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is the safe country of origin concept used in practice?                            | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. Does national legislation allow for the use of “safe third country” concept?      | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| ❖ Is the safe third country concept used in practice?                                | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. Does national legislation allow for the use of “first country of asylum” concept? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Prior to EU accession, national lists of safe countries of origin and third safe countries were adopted annually by the SAR and applied extensively to substantiate negative first instance decisions. The national courts adopted a practice that the concepts can only be applied as a rebuttable presumption that could be contested by the asylum seeker in every individual case.<sup>450</sup> In 2007, the national law was amended to regulate the adoption of national lists on the basis of EU common lists under Article 29 of the 2005 Asylum Procedures Directive. As a result, since the adoption of this amendment safe countries’ lists were not adopted for a period of nineteen years from 2005<sup>451</sup> until 2024. As a part of different institutional re-arrangements in effort to support the country’s full Schengen accession, on 3 April 2024 the government adopted<sup>452</sup> safe country of origin and safe third countries’ lists.

### 1. Safe country of origin

The LAR defines “safe country of origin” as a “state where the established rule of law and compliance therewith within the framework of a democratic system of public order do not allow any persecution or acts of persecution, and there is no danger of violence in a situation of domestic or international armed conflict.”<sup>453</sup> This concept is a ground for rejecting an application as manifestly unfounded in the [Accelerated Procedure](#).<sup>454</sup>

National legislation allows for the use of a safe country of origin and safe third country concept in the asylum procedure.<sup>455</sup>

<sup>450</sup> See e.g. Supreme Administrative Court, Decision No 4854, 21 May 2002.

<sup>451</sup> The last national annual lists were adopted with Decision №329/2005 of the Council of Ministers, in which Türkiye was not enlisted as a safe country of origin nor as a third safe country.

<sup>452</sup> COM №247 from 3 April 2024.

<sup>453</sup> Additional Provision §1(8) LAR.

<sup>454</sup> Article 13(1)(13) LAR.

<sup>455</sup> Article 13(1)(13)(14) LAR.

The law allows the SAR to propose to the government national lists of safe countries of origin and third safe countries, which are considered to establish a rebuttable presumption.<sup>456</sup> When approving the lists, the government has to consider information sources from other Member States, the EUAA, UNHCR, the Council of Europe and other international organisations in order to take into account the degree of protection against persecution and ill-treatment ensured by the relevant state by means of:

- ❖ The respective laws and regulations adopted in this field and the way they are enforced;
- ❖ The observance of the rights and freedoms laid down in the ECHR or the International Covenant on Civil and Political Rights, or the Convention against Torture;
- ❖ The observance of the non-*refoulement* principle in accordance with the Refugee Convention;
- ❖ The existence of a system of effective remedies against violations of these rights and freedoms.

Safe Countries of Origin: 2025
America
Cuba
Asia
Bangladesh
Pakistan
India
Africa and Middle East
Algeria
Morocco
Tunisia
Tanzania
Ghana
Senegal
Jordan
Eastern Europe and Central Asia
Kazakhstan
Azerbaijan
Armenia
Georgia
South Eastern Europe
Türkiye
Western Balkans
Albania
Bosnia and Herzegovina
Kosovo
Serbia
Montenegro
North Macedonia

## 2. Safe third country

<sup>456</sup> Articles 98-99 LAR.

A “safe third country” is defined in the LAR as “a country other than the country of origin where the alien who has applied for international protection has resided and:

- (a) There are no grounds for the alien to fear for his/her life or freedom due to race, religion, nationality, belonging to a particular social group or political opinions or belief;
- (b) The alien is protected against the refoulement to the territory of a country where there are prerequisites for persecution and risk to his/her rights;
- (c) The alien is not at risk persecution or serious harm, such as torture, inhuman or degrading treatment or punishment;
- (d) The alien has the opportunity to request refugee status and, when such status is granted, to benefit from protection as a refugee;
- (e) There are sufficient reasons to believe that aliens will be allowed access to the territory of such state.”<sup>457</sup>

Firstly adopted as a ground for inadmissibility in 2020 the “safe third country” concept was re-arranged as a ground to refuse the application as manifestly unfounded in [Accelerated Procedure](#).<sup>458</sup> The law presently requires more detailed investigation in order a country to be considered as a “safe third country” including findings that the applicants will be accepted back to its territory.<sup>459</sup> The “safe third country” concept cannot be used as a sole ground for considering the application manifestly unfounded unless there is a connection between the applicant and the third country concerned on the basis of which it would be reasonable for that person to go to that country and, a case-by-case consideration is implemented of the safety of the country for a particular applicant.

In 2020, the law transposed the requirement in Article 38(3)(b) of the recast Asylum Procedures Directive for an applicant to be granted a document in the language of the safe third country, stating that his or her claim was not examined on the merits.

As detailed in the section on [Safe Country of Origin](#), Article 98 LAR provides for the possibility of safe third country lists as well as safe country of origin lists.

Since the concept has not been applied in recent years in practice, implementation setting standards in this respect, both administrative and judicial, are limited to non-existent. In principle, refusals based on the “safe third country” concept relate to countries where the applicant lived or resided for prolonged period of time before departure. Transit or short stay in countries are not considered as sufficient for safe third countries.

Safe Third Countries: 2025
Asia
Bangladesh
Iran
Southeastern Europe
Türkiye

On 5th of February 2026, the Court of Justice of the European Union (CJEU) delivered its judgment in case [C-718/24 \(Aleb\)](#).<sup>460</sup> The case arose from a request for a preliminary ruling by the Administrative Court of Sofia. The CJEU clarified that the ‘safe third country’ concept under Article 33(2)(c) recast APD does not necessarily have to be applied when examining the merits of an application for international protection. An application under substantive examination may be rejected as inadmissible on the grounds that a third country is considered to be a safe third country for the applicant, even when the competent authority has found that the applicant meets the conditions for granting international protection laid down

<sup>457</sup> Additional Provision §1(9) LAR.

<sup>458</sup> Article 13(1)(14) LAR.

<sup>459</sup> Article 13(1)(14) LAR.

<sup>460</sup> Court of Justice of the European Union, Case C-718/24 (Aleb), Judgement from 5 February 2026.

in recast Qualification Directive. By contrast, such an application may be rejected as unfounded, or even manifestly unfounded, only under the conditions set out in Article 32 recast APD and may not, in any event, be rejected as unfounded on the grounds of inadmissibility. The Court further reiterated that, while national authorities may rely on publicly available information and on executive decisions designating certain countries as safe, the application of the “safe third country” must be based on an individual assessment. Member States must ensure that national law provides clear methods to assess, in light of the applicant’s personal circumstances, whether the third country can be considered safe for that applicant; and, in addition, that the sufficient connection between the applicant and the third country must be strong enough to make it reasonable to expect the applicant to travel to that country and cannot be presumed.

### 3. First country of asylum

In 2020, an amendment to the law re-arranged the approach towards the first country of asylum concept.<sup>461</sup> Presently, an application can be dismissed as inadmissible where the asylum seeker has been granted and can still enjoy refugee status or other effective protection in another EU Member State.

National asylum legislation does not envisage the first country of asylum concept separately from, or, in addition to, the “safe third country” lists.

## G. Information for asylum seekers and access to NGOs and UNHCR

### 1. Provision of information on the procedure

#### Indicators: Information on the Procedure

1. Is sufficient information provided to asylum seekers on the procedures, their rights and obligations in practice?  Yes  With difficulty  No
- ❖ Is tailored information provided to unaccompanied children?  Yes  No

The law explicitly mentions the obligation of the SAR to provide information to asylum seekers within 15 days from the submission of the application.<sup>462</sup> The SAR must provide the information orally, if necessary, in cases where the applicant is illiterate.

The information should cover both rights and obligations of asylum seekers and the procedures that will follow in general. Information on existing organisations that provide social and legal assistance has to be given as well. Information has to be provided in a language the asylum seeker declared that he or she understands or, when it is impossible, in a language the asylum seeker may be reasonably supposed to understand.

In practice, the information is always provided to asylum seekers in writing, in the form of a leaflet translated in the languages spoken by the main nationalities seeking asylum in Bulgaria, such as Arabic, Farsi, Dari, Urdu, Pashto, Kurdish, English and French. Information by leaflets or, where needed, in other ways (UNHCR or NGO info boards) is usually provided from the initial application (e.g. at the border) until the registration process is finished.<sup>463</sup> Since the end of 2017, information boards are placed in all reception centres, indicating the respective movement zones applicable for the asylum seekers there accommodated, to reflect the needs following the 2015 reform of the LAR (see [Freedom of Movement](#)).<sup>464</sup> SAR centres also display information boards which indicate the place and time where applicants can obtain information from the agency’s staff about the development of their status determination procedures.

<sup>461</sup> Article 15(1)(6) LAR.

<sup>462</sup> Article 58(8) LAR.

<sup>463</sup> EASO, Stock taking report on the asylum situation in Bulgaria, March 2014, 3.2. Asylum Determination Procedure.

<sup>464</sup> Article 29(1)(2) LAR.

The common leaflet and the specific leaflet for unaccompanied children drafted by the Commission as part of the Dublin Implementing Regulation are not being used in Bulgaria or being provided to asylum seekers.<sup>465</sup> The same applies to the information provided on the SAR's website, which is also available only in Bulgarian.

Since 2018, several animated videos provided by UNHCR are made available in the reception centres. This includes a video targeting children, which provides information on their daily routine and the importance of school attendance. The video is 1 hour and 40 minutes long and is available in Urdu, Pashto and Dari. Another video of 7 minutes, available in English, Arabic, Dari, Pashto and Kurdish Kurmanji, provides introductory information relating to the asylum procedure as well as rights and obligations during the procedure. Four other videos are dedicated to information on human trafficking and sexual exploitation. They are available in English with Pashto subtitles and address targeted messages to unaccompanied children. However, practice indicates that these videos are not screened on a regular basis. This considered, the obligation to deliver written introductory information is fulfilled in 99% of monitored cases.<sup>466</sup>

The applicants who are placed in closed centres should further receive information about the internal rules applicable to the respective centre as well as about their rights and obligations. Under national law, information should be provided in a language they understand.<sup>467</sup> In 2022, UNICEF developed for SAR special videos in Arabic and Farsi/Dari/Pashto languages targeting as audience the unaccompanied asylum seeking and refugee children. The videos aim to promote the specialized childcare facilities (ЛНСТ) where the children should be accommodated after the recognition but also can be accommodated during the asylum procedure. Since mid-2022, the SAR began to actively search for opportunities to accommodate unaccompanied children in licensed family-type children's centres (ЛНСТ). During the procedure such efforts were undertaken mainly regarding children below age of 14, children with specific needs or such identified as being at increased risk of trafficking or harm. Following the recognition and status granting these efforts targeted all unaccompanied children, excluding those in family reunification procedures, allowed to wait the reunification with their parents or other family members in SAR reception centres.<sup>468</sup> However, the majority of children hesitate to leave the familiar conditions of the reception centres. Therefore, the videos show-case other children who have been already accommodated in specialized childcare facilities who share their positive experience thus assisting to mitigate the existing prejudice among the children in reception centres and their anxiety of the unknown.

NGOs, in particular UNHCR's implementing partners, develop and distribute other leaflets and information boards that are simpler and easier to read and some do operate reception desks where this kind of information is also provided orally to the asylum seekers by BHC or the Red Cross. In 2018, the information on [asylum.bg](https://asylum.bg) – the online accessible tool, whose development was funded in 2014 by UNHCR - was revised and made available in audio version for illiterate users. In 2022, an additional [section on temporary protection](#) in Ukrainian was added. In 2025, [asylum.bg](https://asylum.bg) was visited by 21,234 individual users.<sup>469</sup>

---

<sup>465</sup> Commission Implementing Regulation (EU) No 118/2014 of 30 January 2014 amending Regulation (EC) No 1560/2003 laying down detailed rules for the application of Council Regulation (EC) No 343/2003 establishing the criteria and mechanisms for determining the Member State responsible for examining an asylum application lodged in one of the Member States by a third-country national.

<sup>466</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/49TvJdp>.

<sup>467</sup> Art. 45d (3) LAR.

<sup>468</sup> SAR, Rules and procedures on the accommodation of unaccompanied children granted international protection in foster families, social or integrated socio-medical care facilities for children of a residential type, adopted in October 2022.

<sup>469</sup> Bulgarian Helsinki Committee, 2025 Annual activity and financial reports, available in Bulgarian [here](#).

## 2. Access to NGOs and UNHCR

### Indicators: Access to NGOs and UNHCR

1. Do asylum seekers located at the border have effective access to NGOs and UNHCR if they wish so in practice?  Yes  With difficulty  No
2. Do asylum seekers in detention centres have effective access to NGOs and UNHCR if they wish so in practice?  Yes  With difficulty  No
3. Do asylum seekers accommodated in remote locations on the territory (excluding borders) have effective access to NGOs and UNHCR if they wish so in practice?  Yes  With difficulty  No

NGOs, lawyers and UNHCR staff have unhindered access to all border and inland detention centres and try to provide as much information as possible related to detention grounds and conditions.<sup>470</sup> Despite that, the subject remains difficult to explain, and an extremely high percentage of asylum seekers claim not to understand the reasons for being detained.

The LAR provides that, where there are indications that the individuals in detention facilities or at border crossing points may wish to make an asylum application, the government shall provide them with information on the possibility to do so.<sup>471</sup> The information should at least include how to apply for asylum and the procedures to follow, including in immigration detention centres, and interpreted in the respective language to assist asylum seekers' access to procedure. This obligation is not fulfilled in practice, as no one among SAR staff is visiting or consulting potential asylum seekers who are apprehended at the border or in immigration detention centres, where the provision of information depends entirely on legal aid NGOs' efforts and activity.

In those detention facilities and crossing points, Bulgaria is also legally bound to make arrangements for interpretation to the extent necessary to facilitate individual access to the asylum procedure. In practice, however, interpretation services are not secured by the authorities, and the only services in this respect are provided by the Bulgarian Helsinki Committee under UNHCR funding. Although Article 8(2) of the recast Asylum Procedures Directive, allowing organisations and persons providing advice and counselling to asylum applicants to have effective access to applicants present at border crossing points, including transit zones at external borders, is transposed in the national law,<sup>472</sup> in practice there are no other NGOs besides the Bulgarian Helsinki Committee which provide regular legal assistance in these areas. Other NGOs such as Centre for Legal Aid – Voice in Bulgaria, Bulgarian Lawyers for Human Rights and Foundation for Access to Rights provide project-based and targeted legal assistance in the **Busmantsi** pre-removal detention centre. At the end of 2016 the International Organisation for Migration (IOM) Bulgaria received the first of many AMIF funding cycles to also provide legal counselling on status determination procedure to asylum seekers in reception centres and to irregular migrants in detention centres regarding assisted voluntary return. This assistance however is not conditioned by requirements about the qualifications of assistance providers and is ensured through shifting mobile teams on a weekly schedule. During the period 2020-2021 IOM restricted its visits to detention centres in Busmantsi and Lyubimets, while during 2022 to 2024 including its reception rooms remained locked with no services provided. However, in 2025 IOM resumed, with a more limited scope, its activity, primarily in Busmantsi detention centre, by rendering assistance to immigration police in ongoing AVR<sup>473</sup> cases of detainees, most commonly with respect provision of information on available re-integration support or issuance of travel documents.

Concerning urban asylum seekers and refugees living in the **Sofia** region, UNHCR has funded an Information Centre, run by the Red Cross along with an Information Bureau for Third Country Nationals,

<sup>470</sup> For more information, see General Directorate Border Police, UNHCR and BHC, 2021 Annual Border Monitoring Report: Access to territory and international protection, May 2022, available at: <http://bit.ly/2jsyglh>, para 1.1.3.

<sup>471</sup> Article 58(6) LAR; Article 8(1) recast Asylum Procedures Directive.

<sup>472</sup> Article 23(3) LAR.

<sup>473</sup> Assisted voluntary returns.

co-funded by Sofia Municipality, both located in Sofia. In 2025, in these two centres, the Red Cross provided 14,512 consultations and different types of information, while in SAR reception centre in Harmanli the organization provided 2,491 social consultations and services.<sup>474</sup> These Red Cross centres however, except one centre in Sofia, closed operation on 1 January 2026 due to the financial crisis of the UN / UNHCR which has been the primary source of funding for these activities for over two decades.

In 2022, UNHCR and UNICEF opened and operated “Blue Dot” services at two main border entry points in Ruse and Durankulak as well as in the rest of the major hot-spots in Sofia, Varna, Dobrich and Burgas, which after the beginning of the war in Ukraine received and hosted large number of Ukrainian refugees.<sup>475</sup> These services were managed by the regional branches of the Red Cross, and assisted by the Helsinki Committee, the Council of Refugee Women and representatives from the refugee community. The Blue Dots were closed on 1 January 2024 and from mid-March 2024 replaced by the so-called Compass network of protection and inclusion centres, funded by UNHCR. These centres are run by different NGO partners of UNHCR such as Red Cross, Ukraine Support and Renovation Foundation, Energy Association Varna, Caritas Bulgaria, and Foundation for Access to Rights in Sofia, Plovdiv, Varna, Burgas, Dobrich, and Ruse. These centres were aimed to serve as protection and inclusion community hubs to promote collective empowerment, integration, and social cohesion for refugees of all nationalities and vulnerable people among the local host communities alike, through comprehensive support tailored to their diverse needs<sup>476</sup>.

Starting from 1 January 2025 the UNHCR ceased to support any legal or social counselling or assistance directly provided to asylum seekers in SAR reception centres through its NGO partners Red Cross, the Helsinki Committee, Council of Refugee Women and Caritas, and left these kinds of services to be provided exclusively in its Compass centres located in urban areas. Therefore, in 2025 no direct services or assistance by NGOs or UNHCR was provided to asylum seekers in the SAR reception centres, except in Harmanli, where the NGO Helsinki Committee has its regional office situated within the centre’s compound.

A similar or worse situation will be seen in 2026, with further reduction of services following the closure on 1 January 2026 of the Bulgarian Helsinki Committee’s legal aid receptions in Harmanli and Sofia<sup>477</sup>, which had been providing pro bono legal aid to asylum seekers, refugees, subsidiary and temporary protection holders for 30 years since 1996.

## H. Differential treatment of specific nationalities in the procedure

### Indicators: Treatment of Specific Nationalities

1. Are applications from specific nationalities considered manifestly well-founded?  Yes  No  
❖ If yes, specify which:
2. Are applications from specific nationalities considered manifestly unfounded?<sup>478</sup>  Yes  No  
❖ If yes, specify which: Algeria, Bangladesh, Morocco, Pakistan, Egypt and Tunisia

In 2025, the overall recognition rate decreased to 20% from 61% in 2024, 66% in 2023 and 91% in 2022 of all decisions on the merits. Both refugee recognition and subsidiary protection rates continued to decrease. Refugee recognition decreased to 0.1%<sup>479</sup> and subsidiary protection (defined as ‘humanitarian

<sup>474</sup> Teleconference with the Red Cross, Refugee service director on 13 February 2026.

<sup>475</sup> UNHCR Bulgaria, UNHCR and UNICEF open Blue Dot support hubs for Ukrainian refugees in Bulgaria, 9 May 2022, available at: <https://bit.ly/3eCAxgq>.

<sup>476</sup> UNHCR Bulgaria, Compass Bulgaria Network of Protection and Inclusion Centres, available [here](#).

<sup>477</sup> Bulgarian Helsinki Committee, The BHC Legal Aid Reception for Refugees and Migrants ceased its operation on 1 January 2026, published on 12 January 2026, available [here](#).

<sup>478</sup> Whether under the “safe country of origin” concept or otherwise.

<sup>479</sup> Previous refugee recognition rates: 0,7% in 2024; 1% in 2023; 2% in 2022; 4% in 2021; 13% in 2020; 13% in 2019; 15% in 2018; 14% in 2017; 25% in 2016; 76% in 2015; 69% in 2014.

status' under national law) rates fell to 19% in 2025.<sup>480</sup> The rejection rate reached 80%,<sup>481</sup> when considering only decisions issued on the substance of asylum claims. The top 5 countries of origin of asylum seekers entering Bulgaria in 2025 were Morocco, Afghanistan, Syria, Iraq and Egypt. For over a decade, applicants from Syria and Afghanistan constituted the majority of asylum applications in Bulgaria. The shift was caused by several factors. First, Afghan nationals continued to face reduced recognition in 2025, as in 2024 and 2023, with an overall recognition rate of just 4% (0.3% refugee status and 3.7% subsidiary protection) and a 96% rejection rate.<sup>482</sup> The majority (78%) of Afghan applicants<sup>483</sup> continued to abscond before receiving a first instance decision, which was issued on the merits in 22% of the caseload.<sup>484</sup> Additionally, more than 1.5 million Afghans have been forced back to Afghanistan from Iran in 2025<sup>485</sup>, followed by a blockade of the border between the two countries thus preventing to a large extent onward movements to EU. The most radical change, however, related to an overturn in recognition rates of Syrian applicants. Since 2014, Syrian applicants have been treated as *prima facie* refugees with the majority of them granted subsidiary protection based on the understanding that they flee from internal armed conflict.<sup>486</sup> Starting from mid-2024 the SAR initiated individual assessment of Syrian applications, which in 2025 resulted in a 64,2% rejection and 35,8% recognition rate (1.8% refugee recognition rate and 34% subsidiary protection).

## 1. Afghanistan

Between 2016 and 2021, Afghanistan has been the top country of origin of asylum applicants in Bulgaria. This changed in 2022, when the top country of origin became Syria. Yet, during this period, or arguably due to the focus on the situation in Syria, applications from Afghan nationals were arbitrarily considered as manifestly unfounded. They were predominantly channelled in the [Accelerated Procedure](#) and successively rejected, to the point that Bulgaria registered the lowest recognition rates for Afghans in Europe – 2.5% in 2016, 1.5% in 2017, 4% in 2019, and 1.8% in 2020. In the majority of cases, protection was granted following court decisions overturning the refusals of the asylum administration. The “striking discrepancy between the Bulgarian and the EU average recognition rate for Afghans” has been mentioned by the European Commission,<sup>487</sup> as well as jurisdictions in other Member States, as a matter of concern.<sup>488</sup>

Since mid- 2021, decisions on Afghan cases began to gradually change, also possibly due to the presence of some high-profile cases and increased claims regarding personal risk of persecution. As a result, the annual recognition rate of Afghan applicants reached a national record of 10%, although still far below the average EU recognition rate. In 2022 for the first time in a decade the Afghan applicants were treated in a non-discriminatory way, with 49% overall recognition rate (14% refugee recognition rate and 35% subsidiary protection rate) and 51% rejection rate.

However, in 2023, 2024 and especially in 2025 recognition rates for Afghan nationals started to drop once more.<sup>489</sup> In 2025, only 4% substantive protection rate (0.3% refugee recognition rate and 3.7% subsidiary

---

<sup>480</sup> Previous subsidiary protection rates: 60% in 2024; 65% in 2023; 89% in 2022; 57% in 2021; 47% in 2020; 15% in 2019; 20% in 2018; 18% in 2017; 19% in 2016; 14% in 2015; 25% in 2014.

<sup>481</sup> Previous rejection rates: 39% in 2024; 39% in 2023; 9% in 2022; 39% in 2021; 39% in 2020; 71% in 2019; 65% in 2018; 68% in 2017; 56% in 2016; 10% in 2015; 6% in 2014.

<sup>482</sup> 2024 AIDA update: 10% overall recognition rate with 0.3% refugee recognition rate and 9.7% subsidiary protection rate and a 90% rejection rate; 2023 AIDA update: 14% overall recognition with 5% refugee recognition rate and 9% subsidiary protection rate vs 65% rejection / 2022 AIDA update: 49% overall recognition with 14% refugee recognition rate and 35% subsidiary protection rate vs 51% rejection rate.

<sup>483</sup> 1,134 discontinued procedures out of all 1,461 decisions taken in 2025 with respect to Afghan nationals.

<sup>484</sup> See, Table Statistics, pages 8-12 of this report: 1,461 Afghan decisions on the merits.

<sup>485</sup> Office of the UN High Commissioner on Human Rights, UN experts appalled by mass forced returns of Afghan nationals, published on 18 July 2025, available [here](#).

<sup>486</sup> Article 15(c) of 2011/95/EC Directive.

<sup>487</sup> European Commission, Measures for improvement of the Bulgarian asylum system, 6 July 2017, available at: <http://bit.ly/2EudWMH>, 7.

<sup>488</sup> See e.g. (Switzerland) Federal Administrative Court, Decision E-3356/2018, 27 June 2018; (Belgium) Council of Alien Law Litigation, Decision No 185 279, 11 April 2017.

<sup>489</sup> 2024 AIDA Update: 10% overall recognition rate with 0.3% refugee recognition rate and 9.7% subsidiary protection rate vs 90% rejection; 2023 AIDA update: 14% overall recognition with 5% refugee recognition rate

protection rate), while the rejection rate surged to 96%. The majority (78%) of Afghan applicants<sup>490</sup> continued to abscond before receiving a first instance decision, which was issued on the merits only in 22% of cases.<sup>491</sup>

## 2. Türkiye

Similar to the situation of Afghan asylum seekers, the applications for protection lodged by Turkish nationals were treated as manifestly unfounded and considered as originating from a “safe country of origin” for many years (from 2014 to 2021), notwithstanding the fact that the Bulgarian asylum system presently does not officially apply any of the safe country concepts.<sup>492</sup> Prior to 2024, Bulgaria had not adopted a list of “safe countries or origin” since 2005.<sup>493</sup> Following the adoption<sup>494</sup> in April 2024 of the safe country of origin and safe third countries’ national lists, Türkiye is considered both a safe country of origin and a safe third country.

Moreover, despite settled case-law whereby the lodging of an application for international protection entitles the asylum seeker to apply for an immediate release from detention, many Turkish asylum seekers were kept in immigration detention centres for the entire duration of their asylum procedure, in violation of national law. They were subsequently subject to negative decisions and deported back to Türkiye. In such cases, the immigration police made every effort to prevent Turkish detainees from accessing lawyers and legal advice. This practice has been publicly recognised and acknowledged by the former Prime Minister,<sup>495</sup> and seemed to be the result of an informal political agreement between the Bulgarian and Turkish governments.<sup>496</sup> It was a long-standing practice of the Bulgarian authorities to prevent the Turkish nationals from access to procedure and international protection, as well as to expedite their return to the country of origin including, in several cases, in violation of the *non-refoulement* principle. In return, the Turkish authorities divert to a large extent the migratory pressure from the Bulgarian border to the Greek one.<sup>497</sup> It was presumed that similar arrangements were reached mid-2023, since after the summer peak of 5,025 individuals who entered Bulgaria during August alone,<sup>498</sup> the number of the new arrivals gradually decreased to only 546 individuals (-88%) in December 2023.<sup>499</sup>

In July 2021, the European Court of Human Rights (ECtHR) ruled that Bulgarian authorities had violated European human rights law by summarily returning a man to Türkiye, thus condemning the longstanding practice of denying Turkish refugees protection from persecution and handing them straight back to Türkiye.<sup>500</sup> On 8 July 2021 the MOI’s General Border Police Directorate, UNHCR and the Bulgarian Helsinki Committee signed an annex to 2010 Tripartite Memorandum of Understanding including the readmission procedures in the scope of the national monitoring. The aim was to assist the third country nationals who wish to apply for asylum in Bulgaria to be safeguarded from refoulement perpetrated by the means of readmission, among whom the Turkish nationals were designated as a special target group.

---

and 9% subsidiary protection rate vs 65% rejection / 2022 AIDA update: 49% overall recognition with 14% refugee recognition rate and 35% subsidiary protection rate vs 51% rejection rate.

<sup>490</sup> 1,134 discontinued procedures out of all 1,461 decisions taken in 2025 with respect to Afghan nationals.

<sup>491</sup> See, Table Statistics, page 9 of this report: 327 Afghan decisions on the merits.

<sup>492</sup> Bulgaria has not adopted a list of “safe countries or origin” since 2001; the last national annual lists were adopted with Decision №205/19.04.2000 of the Council of Ministers, in which Türkiye was not enlisted as a safe country of origin nor as a third safe country.

<sup>493</sup> The last national annual lists were adopted with Decision №329/2005 of the Council of Ministers, in which Türkiye was not enlisted as a safe country of origin nor as a third safe country.

<sup>494</sup> COM №247 from 3 April 2024.

<sup>495</sup> Businessinsider, ‘Strasbourg Court Quizzes Bulgaria over Gullenists Extradition’, 25 April 2018, available at: <https://bit.ly/2S0ZPGU>.

<sup>496</sup> Businessinsider, ‘Turkey’s plan to flood Europe with millions of refugees is a real and dangerous threat, officials warn’, 11 October 2019, available at: <https://bit.ly/31szogj>.

<sup>497</sup> Offnews, The Turkish Ambassador promised to sustain the migrant pressure towards Bulgaria at a zero level, 3 May 2020, available in Bulgarian at: <https://bit.ly/397W2Ph>.

<sup>498</sup> MOI statistics, December 2023, available in Bulgarian at: <https://bit.ly/48C57wC>.

<sup>499</sup> Ibid.

<sup>500</sup> ECtHR, D v. Bulgaria (application №29447/17), Judgement of 20 July 2021. See also: ecchr.eu, ‘European Court of Human Rights: Bulgaria’s pushback practice violates human rights’, 20 July 2021, available at: <https://bit.ly/3niDVyf>.

In 2022, a gradual improvement in Turkish applicants' treatment was registered. Just 33% of cases were dealt as manifestly unfounded in accelerated procedure, while in 2021 these were 83% of the decided cases. In 2023, their treatment once more deteriorated – a 100% rejection rate was registered, with 58% of Turkish applicants receiving a rejection in accelerated procedures after their claim was considered as manifestly unfounded.<sup>501</sup> This might be related to the renewed assistance by the Turkish authorities to prevent the migratory pressure on the Bulgarian border in the second half of the year (see above in this paragraph). In 2024, the recognition of Turkish applicants slightly improved, with a 14% overall recognition rate (0% refugee recognition rate and 14% subsidiary protection rate) and an 86% rejection rate. In 2025, once more registered a 100% rejection rate<sup>502</sup> was once more registered for Turkish applicants, with 82% of applications dealt in an accelerated procedure, and 18% with examined in a regular procedure.

### 3. Iraq

For many years, Iraqi applicants enjoyed relatively fair assessments and an overall recognition rate ranging from 40% to 55%.<sup>503</sup> However, in 2017 their recognition drastically dropped. In general, the arguments in the negative decisions of both asylum authority and the Courts refer to the defeat of ISIS and to improvements in the safety and security across the country's conflict areas and war zones. Claims by applicants from Central and Southern Iraq are considered manifestly unfounded in general. Moreover, it was publicly recognised that Bulgaria has been exploring possible diplomatic avenues to increase the possibility of both forced and voluntary returns and is in a process of consultation for concluding a Memorandum of Understanding with Iraq.<sup>504</sup> No information is available as to whether the memorandum was indeed agreed. Despite that, Iraq was not included<sup>505</sup> neither in the safe countries of origin list, nor in the list of safe third countries (see, [F. The safe countries concepts](#)) adopted in April 2024. In 2025, Iraqi applications continued to be treated as manifestly unfounded in most cases, with 94% of applications dealt with in accelerated procedures. The recognition rate for Iraqi cases was of just 1.7% (0.2% refugee recognition and 1.5% subsidiary protection rates), with an overall 98.3% rejection rate.

### 4. Syria

Between 2014 to mid-2015, the SAR established the so-called *prima facie* approach to assessing Syrian applications for protection as “manifestly well-founded”. From 2015<sup>506</sup> to 2023<sup>507</sup> including, Syrian applicants topped the chart of the nationalities with highest recognition rates ranging, respectively, between 99% to 98% recognition. This approach is no longer applied.

This situation changed radically in October-December 2024 when the SAR announced<sup>508</sup> to have started applying an individual approach when assessing and determining Syrian asylum applications. During this period alone, the SAR issued in total 1,125 refusals to Syrian asylum seekers. After the fall of Bashar al-Assad's regime on 8 December 2024 the SAR suspended<sup>509</sup> until 31 January 2025 both to conduct interviews and issue decisions to Syrian nationals. However, these were resumed in February 2025. Therefore, in 2025 Syrian applicants registered a 38% overall recognition rate (1.8% refugee recognition rate and 34% subsidiary protection rate) and an 64.2% rejection rate. This approach, applied since mid-2024, drastically reduced with 89% the new arrivals from Syria in 2025<sup>510</sup> in comparison with the previous year, and also increased to 30% their absconding and secondary movement.

---

<sup>501</sup> SAR, reg. No. №PД05-31 from 15 January 2024.

<sup>502</sup> See, above [Applications and granting of protection status at first instance](#) Table, pages 11-12.

<sup>503</sup> For example, in 2015: 22% refugee status, 20% subsidiary protection; 2016: 33% refugee status, 10% subsidiary protection.

<sup>504</sup> European Commission, Reporting on progress made on the Pilot Project for fast asylum and return procedures with Bulgaria, available at: <https://bit.ly/4bTun4k>.

<sup>505</sup> COM №247 from 3 April 2024.

<sup>506</sup> 2015: 4520 refugee statuses, 802 subsidiary protection statuses, 61 refusals with respect to Syrian applicants.

<sup>507</sup> 2023: 72 refugee statuses, 5550 subsidiary protection statuses, 136 refusals with respect to Syrian applicants.

<sup>508</sup> 134<sup>th</sup> Coordination Meeting, held on 19 December 2024.

<sup>509</sup> Ibid.

<sup>510</sup> 2025: 823 Syrian applications; 2024: 7,646 Syrian applications.

## 5. Other nationalities

Applications of nationals from certain countries are treated as manifestly unfounded with low to zero recognition rates and overwhelming rejection rates, such as **Algeria, Tunisia and Bangladesh** (100% rejection rate), **Morocco** (99.5%), **Egypt** (98.6%) and **Pakistan** (95%). In the majority of the cases for these nationalities, status determination is conducted under an [Accelerated Procedure](#).

## Reception Conditions

### Short overview of the reception system

- ❖ **Access to reception:** The national asylum agency SAR is the authority responsible for the reception of asylum seekers.<sup>511</sup> Their access to reception is guaranteed under the law, though not from the application's submission, but from the moment of their registration as asylum applicants by the SAR.<sup>512</sup> The right to accommodation applies to asylum seekers subject to Dublin, accelerated and general procedures.<sup>513</sup> Asylum seekers who submitted a subsequent application, and which were admitted to the determination procedure, are excluded from access to reception centres, food, accommodation and social support unless they are considered to be vulnerable.<sup>514</sup>
- ❖ **Reception centres:** SAR operates two types of collective reception facilities - transit centres and reception-and-registration centres.<sup>515</sup> Both types can be used for registration, accommodation, medical examination and implementation of asylum procedure. They can also both operate as open or closed type centres. Originally, the transit centres were designed to operate in border areas and to accommodate only the asylum seekers subject to the accelerated procedure, while the reception-and-registration centres had to accommodate those who have been admitted to a general procedure.<sup>516</sup> This difference was gradually erased with series of amendments from 2002 to 2015. Moreover, safe zones for unaccompanied children were recently opened, the first one in mid-2019, and then the second one in early-2020.<sup>517</sup> Both are located in the reception-and-registration centre (RRC) in Sofia at the Voenna Rampa and Ovcha Kupel shelters, where children were provided round-the-clock care and support tailored to their specific and individual needs. These two safe-zones in Sofia, with an initial total capacity of 288 places, are operated by the International Organisation for Migration (IOM) - Bulgaria and funded by the EC's financial instruments. In July 2022 a report by the national Ombudsperson recommended to SAR to establish a new safe zone in the Harmanli reception centre.<sup>518</sup> In May 2024, a third safe zone with a capacity for 98 children was open<sup>519</sup> in the biggest reception centre in Harmanli, following a collaboration with UNICEF and IOM, funded by the Swiss State Secretariat for Migration (SEM). Thus, the total capacity of the safe-zone reached 346 places. Despite the decreasing numbers of arrivals of unaccompanied children (- 78% in 2025, -48% in 2024),<sup>520</sup> and even at increased capacity, the three safe zones would still be insufficient to shelter all newcomers if it was not for the extremely high 82%<sup>521</sup> absconding rate which continued to be most typical and systemic issue with respect to treatment of unaccompanied children. Starting in 2022, SAR began to invest systematic efforts in providing unaccompanied children with accommodation in specialized child care facilities. By 2025, the percentage of children benefiting from this most suitable form of care continued to gradually increase.<sup>522</sup>

<sup>511</sup> Article 47(2) in conjunction with Article 48(1)(11) LAR.

<sup>512</sup> Article 68(1)(1) LAR.

<sup>513</sup> Article 29(2) LAR.

<sup>514</sup> Article 29(7) LAR.

<sup>515</sup> Article 47(2) LAR.

<sup>516</sup> Law on Asylum and Refugee, as adopted St.G. №54 from 31 May 2002.

<sup>517</sup> IOM, 'Official opening of the first Safety Zone for unaccompanied asylum-seeking children in Bulgaria', 29 May 2019, available at: <https://bit.ly/2RnAG7N>.

<sup>518</sup> Ombudsperson of the Republic of Bulgaria, Доклад на Националния превантивен механизъм за извършени проверки в структури на Дирекция „Миграция“ към Министерство на вътрешните работи и Държавна агенция за бежанците към Министерски съвет, available at: <https://bit.ly/3leBgzJ>.

<sup>519</sup> SAR, Откриване на сигурна зона за непридружени деца-бежанци в РГЦ-Харманли, 16 May 2024, available in Bulgarian [here](#).

<sup>520</sup> 2025: 573 unaccompanied children; 2024: 2,601 unaccompanied children; 2023: 3,843 unaccompanied children / 2022: 3,348 unaccompanied children / 2021: 3,172 unaccompanied children.

<sup>521</sup> 2025: 181 substantive decisions, 845 discontinuations of procedure due to absconding.

<sup>522</sup> 2025: 7% or 41 (11 asylum seeking and 30 granted protection) of 573 unaccompanied children; 2024: 3% or 62 children (4 asylum seeking and 58 granted protection) of 2,061 unaccompanied children; 2023: 1% or 43 children (2 asylum seeking and 41 granted protection) of 3,843 unaccompanied children; 2022: 0,8% or 26 children (2 asylum seeking and 24 granted protection) of 3,348 unaccompanied children.

In 2022, an internal revision of the reception centres' capacity conducted by SAR revealed it<sup>523</sup> was far below the 5,160 places available that had been indicated for a long time, mainly because the designated premises were unfit for living. In 2025, SAR reported just 3,125 places available for accommodation<sup>524</sup> in all its reception centres, which marked yet another 4% decrease in comparison with previous year.

Accommodation outside the reception centres in individual dwellings is permitted, but accessible only to asylum seekers who can financially afford to meet their rent/utilities costs and under the condition to have alleviated their right to receive any other material or social support during the procedure.<sup>525</sup>

In 2018 the UN Human Right Committee raised concerns relating the identified need to further improve conditions for persons seeking international protection by ensuring that reception centres provide basic services, protecting asylum seekers and migrants from attacks and abuse, and by ensuring adequate access to social, psychological, rehabilitation and health-care services and benefits in practice.<sup>526</sup> These concerns had not been entirely addressed as of the end of 2025, mainly due to the SAR being severely underfunded during the course of the last four years. The SAR annual budgets were,<sup>527</sup> respectively, in 2021: 10,689,700 BGN; in 2022:14,095,300 BGN; in 2023: 12,038,218 BGN and in 2024: 11,717,200 BGN. The only budget allocated for repairs or refurbishment<sup>528</sup> of the reception centres was of 145,000 BGN in 2022, with no such means allocated in the 2020, 2021, 2023 or 2024 annual budgets of the asylum agency. In 2025 however, the new politically appointed SAR leadership<sup>529</sup> received a budget of BGN 16,000,000, of which BGN 3,900,000 solely for capital investments and refurbishment. Notwithstanding, reception centres accommodating applicants during their asylum procedure continued to face persistent issues related to infrastructure and living conditions, often falling below basic standards.

❖ **Reception capacity:** In 2025, the number of new arrivals in Bulgaria decreased by 68%. This reflected on the occupation rate in reception centres, which dropped to 11%<sup>530</sup> by the end of the year, when the country usually experiences the lowest numbers of the new arrivals due to winter weather conditions. Notwithstanding, the constantly decreasing reception capacity of the SAR (see, [Overview of the main changes, Reception centers](#)) would be raising serious concerns due to the high likelihood of over-crowding throughout spring to autumn months, if it was not for the high (78%)<sup>531</sup> absconding rate of Afghan applicants and the rising (30%)<sup>532</sup> absconding rates registered for Syrian applicants at the end of 2025. The absconding rate for Syrians increased significantly after the SAR shifted its policy, from treating these applications as manifestly founded to conducting individual assessment and determination, which resulted in higher refusal rates (see, [H. Differential treatment of specific nationalities in the procedure](#)). The main reason for Afghan absconding can be likely found in the low recognition rates for this nationality (see, [H. Differential treatment of specific nationalities in the procedure](#)). Therefore, many Afghan applicants do not wish to continue their asylum process in Bulgaria (see [Differential treatment of specific nationalities in the procedure](#)).

---

<sup>523</sup> 118<sup>th</sup> Coordination meeting held on 22 December 2022.

<sup>524</sup> SAR, reg. №П0-02-115 from 22 February 2026.

<sup>525</sup> Article 29(9) LAR.

<sup>526</sup> Human Right Committee, Concluding observations on the fourth periodic report of Bulgaria, CCPR/C/BGR/CO/4, 15 November 2018, available at: <https://bit.ly/39rxz7T>.

<sup>527</sup> SAR reg. №АД-07-47 from 9 December 2024.

<sup>528</sup> SAR reg.№ЦУ-РД05-123/27.02.2024.

<sup>529</sup> See, the paragraph above, National context.

<sup>530</sup> 143rd Coordination meeting held on 16 December 2025.

<sup>531</sup> 1,969 terminated procedures out of all 1,980 Afghan applicants.

<sup>532</sup> 4,357 terminated procedures out of all 7,646 Syrian applicants.

## A. Access and forms of reception conditions

### 1. Criteria and restrictions to access reception conditions

#### Indicators: Criteria and Restrictions to Reception Conditions

1. Does the law allow access to material reception conditions for asylum seekers in the following stages of the asylum procedure?
- |                          |   |  |  |
|--------------------------|---|--|--|
| ❖ Regular procedure      | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No            |
| ❖ Dublin procedure       | <input type="checkbox"/> Yes            | <input type="checkbox"/> Reduced material conditions | <input checked="" type="checkbox"/> No |
| ❖ Accelerated procedure  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No            |
| ❖ First appeal           | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No            |
| ❖ Onward appeal          | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Reduced material conditions | <input type="checkbox"/> No            |
| ❖ Subsequent application | <input type="checkbox"/> Yes            | <input type="checkbox"/> Reduced material conditions | <input checked="" type="checkbox"/> No |
2. Is there a requirement in the law that only asylum seekers who lack resources are entitled to material reception conditions?  Yes  No

Asylum seekers are entitled to material reception conditions according to national legislation during all types of asylum procedures, except in those implemented to admit or assess subsequent applications.<sup>533</sup> Although there is no explicit provision in the law, asylum seekers without resources are accommodated with priority in the reception centres in case of restricted capacity to accommodate all new arrivals. Circumstances such as specific needs and risk of destitution are assessed in each case. The criteria to assess whether a risk of destitution exists<sup>534</sup> are set to take into account the individual situation of the asylum seeker of concern, such as resources and means of self-support, profession and employment opportunities if work is formally permitted, and the number and vulnerabilities of dependent family members. Nevertheless, asylum seekers have the right to withdraw from these benefits if their application is pending in the regular procedure and they declare that they have the means and resources to support themselves and chose to live outside reception centres. In practice, SAR provides for accommodation and access to the benefits provided therein, to all asylum seekers without a formal assessment procedure and applies such assessment only in the cases of Dublin returnees vis-à-vis their access to accommodation and nutrition at SAR reception centres (see 2.7. [The situation of Dublin returnees](#)).

The law provides that every applicant shall be entitled to receive a registration card in the course of the procedure.<sup>535</sup> In addition, the law implies a legal fiction,<sup>536</sup> according to which the registration card does not certify the foreigner's identity due to its temporary nature and the specific characteristics of establishing the facts and circumstances during the refugee status determination (RSD) procedures which are based, for the most part, on circumstantial evidence.<sup>536</sup> Hence, the registration card serves the sole purpose of certifying the identity declared by the asylum seeker and the right to remain in the territory of the country during the procedure.<sup>537</sup>

Nevertheless, this document is a key prerequisite for access to the rights enjoyed by asylum seekers during the asylum procedure, namely remaining on the territory, receiving shelter and subsistence, social assistance (under the same conditions as Bulgarian nationals and receiving the same amount), health insurance, access to health care, psychological support and education. Since the end of 2015, during the procedure asylum seekers enjoy only shelter, food and basic health care, as none of the other entitlements is secured or provided by the government in practice.

In 2017, the Committee against Torture raised concerns around substandard material conditions in reception centres, the absence of an adequate identification mechanism for persons in vulnerable situations, the removal of their monthly financial allowance, and insufficient procedural safeguards

<sup>533</sup> Article 29(1) and (7) LAR.

<sup>534</sup> Article 29(4) LAR, assessed according the specific guidelines, issued by the SAR Chairperson.

<sup>535</sup> Article 29(1)(7) LAR.

<sup>536</sup> Article 40(3) LAR.

<sup>537</sup> National Commission for Consumers Protection, Payment Disputes Committee, Ref. №ЛЦ-03-5033 from 1 September 2020.

regarding the assessment of claims and the granting of international protection.<sup>538</sup> Despite the period of time which has passed since the CAT report, there have been only moderate improvements to limit the continued deterioration of reception centres' infrastructure,<sup>539</sup> due to lack of budget to implement any refurbishment for the period 2019 to 2023. Therefore, all the findings remain valid to a great extent as of the end of 2025 (see [Conditions in reception facilities](#)).

**Dublin procedure:** Certain asylum seekers channelled in an outgoing Dublin procedure are not automatically entitled to material reception conditions, as they only enjoy limited rights, namely the right to remain in the country's territory, the right to interpretation and the right to be issued a registration card. The LAR distinguishes between persons applying for asylum in Bulgaria, who have access to full reception conditions,<sup>540</sup> and persons found irregularly on the territory in Bulgaria and who have not claimed asylum, but to whom the Dublin procedure might be applied following a formal request submitted by the arresting police department or security services.<sup>541</sup>

Regarding Dublin returnees, the treatment depends on how their individual case has developed in Bulgaria while they were not present in the country:

- In cases where the asylum claim under the Dublin procedure has been rejected *in absentia*, the applicant is treated as an irregular migrant upon return to Bulgaria. This means that access to accommodation and medical assistance is unavailable, but also that the Dublin returnee faces a risk of being detained to secure their return. Only in few cases, applicants manage to restore their appeal deadlines and to bring the negative decisions before the court, but in such cases the chances of success remain extremely limited given the low recognition rates in Bulgaria.
- In cases where the Dublin returnee's procedure in Bulgaria has only been discontinued during their stay abroad, the asylum procedure is re-opened and continues after they are transferred back to the country. Dublin returnees for whom the procedure can be reopened and continued are usually accommodated in an asylum reception centre upon request, although this depends on the occupancy in reception centres.

For more information on Dublin returnees' accommodation - see [2.7. The situation of Dublin returnees](#).

**Subsequent applications:** Subsequent applicants pending an admissibility assessment are excluded not only from all material conditions, but also from the right to receive a registration card. They only have a right to interpretation during the fast-track processing of the admissibility assessment prior to their registration, documentation and determination on the substance.<sup>542</sup> In cases where the first subsequent application is considered to be submitted merely in order to delay or complicate the enforcement of a removal decision, or where it concerns another subsequent application following a final inadmissibility / unfounded decision considering a first subsequent application, the applicants are also stripped from the right to remain on the territory. In 2025, this affected a total of 400 subsequent applicants, who received an inadmissibility decision. The law has set a 14-working days time limit for the admissibility determination. If the subsequent application is considered inadmissible, the determining authority should not open a determination procedure and the applicant is not registered and documented (see section on [Subsequent Applications](#)).

---

<sup>538</sup> Committee against Torture, Concluding observations on the sixth periodic report of Bulgaria, CAT/C/BGR/CO/6, 15 December 2017, available at: <http://bit.ly/2rV4mzR>.

<sup>539</sup> See, Overview of the main changes since the previous report update, Reception conditions.

<sup>540</sup> Article 67a(2)(1) LAR.

<sup>541</sup> Article 67a(2)(2) LAR.

<sup>542</sup> Article 76b LAR.

## 2. Forms and levels of material reception conditions

### Indicators: Forms and Levels of Material Reception Conditions

1. Amount of the monthly financial allowance/vouchers granted to asylum seekers as of 31 December 2025 (in original currency and in €): None

According to the law, reception conditions include accommodation, food, social assistance, health insurance and health care and psychological assistance. These rights, however, can be enjoyed only by asylum seekers accommodated in the reception centres. Asylum seekers who have either opted on their own will to live outside reception centres or to whom the accommodation is refused (see [Reduction or Withdrawal of Reception Conditions](#)) do not have access to food or psychological assistance. Access to the basic health care is otherwise ensured as health insurance is in principle covered by the state budget to all asylum seekers regardless of their place of residence.

From February 2015, the SAR ceased the provision of the monthly financial allowance to asylum seekers accommodated in reception centres, based on the argument that food was to be provided in reception centres three times a day.<sup>543</sup> This situation remained unchanged until 27 July 2025, when the monthly allowance was reinstated with an amendment of the internal rules of the asylum agency<sup>544</sup> and provided in amount of BGN 20, increased to BGN 30 from 1 August 2025<sup>545</sup>. This amount can be increased with 20 BGN more if the applicant participates in the maintenance, hygiene and development activities of the area, as well as to protect the property provided for their use. In 2025, three meals per day were thus distributed to all asylum seekers accommodated in reception centres. The food distribution to adults is provided once a day, while for unaccompanied children the food is distributed three times a day in order to prevent the excess meals to be taken from them by the adults. Since 2017, the food has been delivered by catering services and the quality, but also quantity of the food became one of the most common complaints from asylum seekers, accommodated in reception centres, along with poor hygiene and dismal living conditions (see [Conditions in reception facilities](#)).

## 3. Reduction or withdrawal of reception conditions

### Indicators: Reduction or Withdrawal of Reception Conditions

1. Does the law provide for the possibility to reduce material reception conditions?  
 Yes  No
2. Does the legislation provide for the possibility to withdraw material reception conditions?  
 Yes  No

The reduction of material reception conditions is not possible under the law. Withdrawal is admissible under the law in cases of disappearance of the asylum seeker when the procedure is discontinued.<sup>546</sup>

The SAR applies this ground of withdrawal in practice to persons returned under the Dublin Regulation. In their majority, they are refused accommodation in the reception centres, although this approach is usually not applied to families with children, unaccompanied children and other vulnerable applicants, who are provided shelter and food.

Under the law, the directors of transit / reception centres are competent to decide on whether an asylum applicant should be provided accommodation.<sup>547</sup> These decisions should be issued in writing as all other acts of administration,<sup>548</sup> but in practice asylum seekers are informed orally. Nonetheless, the refusal to provide accommodation can be appealed before the relevant Regional Administrative Court within 7 days from the notification. Legal aid is available for representation before the court once the appeal is

<sup>543</sup> SAR, Order No 31-310, 31 March 2015, issued by the Chairperson Nikola Kazakov.

<sup>544</sup> SAR, Order [No. and date unspecified] 2025, issued by the Chairperson Ivan Ivanov.

<sup>545</sup> SAR, Order [No. and date unspecified] 2025, issued by the Chairperson Ivan Ivanov.

<sup>546</sup> Article 29(8) LAR.

<sup>547</sup> Article 51(2) LAR.

<sup>548</sup> Article 59(2) Administrative Procedure Code.

submitted. In this case, however, asylum seekers face difficulties proving before the court when they have been informed about the accommodation refusal, which may result in cessation of the court proceedings.

Destitution is defined based on the monetary indicator of the national poverty threshold. From 1 January 2025, the threshold is set at BGN 638, equivalent to 327.17€ monthly.<sup>549</sup> The law defines as “basic needs” sufficient food, clothing and housing provided according to the national socio-economic development.<sup>550</sup> The risk of destitution is not formally assessed but the SAR takes it into account in the majority of cases.

Bulgaria does not apply sanctions for serious breaches of the rules of accommodation centres and violent behaviour, except for destruction of a reception centre’s property, which is sanctioned with a fine between 50 to 200 BGN (25.50-102 €) plus the value of the destroyed property.<sup>551</sup> The grounds laid down in Article 20(2) and (3) of the Recast Reception Conditions Directive are not transposed into national legislation.

Relating to subsequent applicants, see [Criteria and Restrictions to Access Reception Conditions](#).

#### 4. Freedom of movement

Indicators: Freedom of Movement		
1. Is there a mechanism for the dispersal of applicants across the territory of the country?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2. Does the law provide for restrictions on freedom of movement?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Asylum seekers’ freedom of movement can be restricted to a particular area or administrative zone within Bulgaria, if such limitations are deemed necessary by the asylum authority, without any other conditions or legal prerequisites.<sup>552</sup> The asylum seeker can apply for a permission to leave the allocated zone and if the request is refused, it must be motivated. Such a permission is not required when the asylum seeker has to leave the allocated zone in order to appear before a court, a public body or administration or if he is in need of emergency medical assistance. The permitted zones of free movement should be indicated in each individual asylum identification card.<sup>553</sup>

Consecutive failure to observe the zone limitation can result in placement in a closed centre until the asylum procedure ends with a final decision.<sup>554</sup> From September 2017, the government formally designated the “movement zones”.<sup>555</sup> These consist of zones covering designated geographical areas around the respective reception centres. The following map illustrates the zone around **Sofia**:

<sup>549</sup> COM No 328 of 30 September 2024.

<sup>550</sup> Article 1(1) Law on Social Assistance.

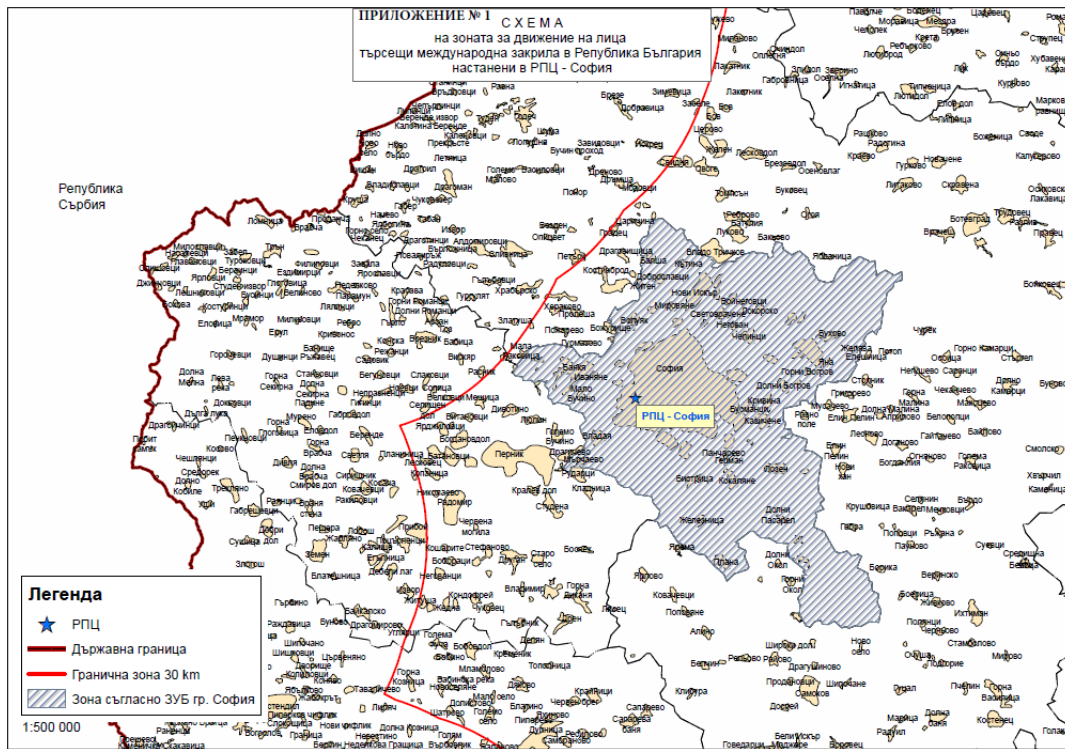
<sup>551</sup> Article 93 LAR.

<sup>552</sup> Article 30(2) and (3) LAR.

<sup>553</sup> Article 44(1)(11) LAR.

<sup>554</sup> Article 95a LAR.

<sup>555</sup> Council of Ministers, Decision No 550 of 27 September 2017.



At the end of 2017, information boards were placed in all reception centres indicating the respective movement zones applicable for the asylum seekers accommodated therein. However, since then, the SAR has not applied this as a ground for detention in a closed centre. In 2025, the SAR applied asylum detention based solely on the person’s attempts to leave Bulgaria to 22 asylum seekers and to 4 asylum seekers on basis of absconding and other conditions for detention pending asylum procedure combined.

## B. Housing

### 1. Types of accommodation

#### Indicators: Types of Accommodation

- |  |                      |
|--|----------------------|
| 1. Number of reception centres: <sup>556</sup>   | 4                    |
| 2. Total number of places in the reception centres:  | 3,125 <sup>557</sup> |
| 3. Total number of places in private accommodation:  | 362 <sup>558</sup>   |
| 4. Type of accommodation most frequently used in a regular procedure:  |                      |
| <input checked="" type="checkbox"/> Reception centre <input type="checkbox"/> Hotel or hostel <input type="checkbox"/> Emergency shelter <input type="checkbox"/> Private housing <input type="checkbox"/> Other |                      |
| 5. Type of accommodation most frequently used in an accelerated procedure:   |                      |
| <input checked="" type="checkbox"/> Reception centre <input type="checkbox"/> Hotel or hostel <input type="checkbox"/> Emergency shelter <input type="checkbox"/> Private housing <input type="checkbox"/> Other |                      |

Reception centres are managed by the SAR. As of the end of 2025, there were 4 reception centres in Bulgaria. The total capacity as of 31 December 2025 was as follows:

<sup>556</sup> Both permanent and for first arrivals. Note that the Refugee Reception Centre Sofia has 3 reception shelters, namely Ovcha Kupel, Vrazhdebna and Voenna Rampa.  
<sup>557</sup> SAR, reg. №ПО-02-115 from 22 February 2026.  
<sup>558</sup> Ibid.

Reception centre	Location	Capacity	Occupancy at the end of 2023	Occupancy at the end of 2024	Occupancy at the end of 2025
Sofia	Western Bulgaria	1,179	1,154	592	210
	<i>Ovcha Kupel shelter</i>	213	568	158	23
	<i>Vrazhdebna shelter</i>	300	307	269	62
	<i>Voenna Rampa shelter</i>	650	270	142	115
	<i>Closed reception ward in Busmantsi</i>	16	9	23	10 <sup>559</sup>
Banya	Central Bulgaria	70	64	54	0
Pastrogor	South-Eastern Bulgaria	300	108	35	0
Harmanli	South-Eastern Bulgaria	1576	1,410	898	63
	<b>Total</b>	<b>3,125</b>	<b>2,736</b>	<b>1,579</b>	<b>273</b>

Source: SAR.<sup>560</sup> Note that the occupancy rate includes asylum seekers accommodated in the closed reception ward within the premises of Busmantsi immigration detention centre - a closed type asylum facility under SAR jurisdiction.

For many years, SAR has been claiming that the maximum capacity of its reception centres was of 5,160 individuals.<sup>561</sup> However, in December 2022 the appointed earlier during that year new SAR management shared<sup>562</sup> that the actual reception capacity was up to a maximum of 3,932 individuals, since the remaining 1,228 places were located in premises unfit for living. In 2025, the national reception capacity continued to decrease to 3,125 places in all SAR reception centres<sup>563</sup> despite the country having registered 3,895 asylum applicants in 2025 alone. This situation is mostly due to the fact that the SAR did not receive any of the funding requested for repairs or refurbishment<sup>564</sup> in its annual budgets from 2020 to 2024. Just BGN 120,000 including VAT were provided in 2022, and no additional funding was provided in 2023, while SAR estimated at the end of 2023<sup>565</sup> to be in need of at least BGN 10,953,746 in order to be able to conduct the most necessary refurbishment, while its entire 2024 budget was of BGN 11,717,200.<sup>566</sup> In 2025 however, the new politically appointed SAR leadership<sup>567</sup> received a budget of BGN 16,000,000, of which BGN 3,900,000 solely for capital investments and refurbishment. Notwithstanding, reception centres accommodating applicants during their asylum procedure continued to face persistent issues related to infrastructure and living conditions, often falling below basic standards. Temporary protection holders were not accommodated in SAR reception centres as due to the large number of arrivals their housing in the spring of 2022 was secured outside them under a Humanitarian Aid Program<sup>568</sup> adopted in March by the regular government (see [Temporary Protection](#)). In 2025, the number of new arrivals in Bulgaria decreased by 68%, which also led to the occupancy rate dropping to 11%<sup>569</sup> by the end of the year, when

<sup>559</sup> SAR closed ward in Busmantsi detention centre (Sofia) was closed on 17 December 2025 with all of its occupants transferred to Pastrogor Transit centre, therefrom designated to operate as the new SAR closed reception facility.

<sup>560</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>561</sup> 110th Coordination meeting held on 10 January 2022.

<sup>562</sup> 118th Coordination meeting held on 22 December 2022.

<sup>563</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>564</sup> SAR, reg. №АД-07-7 from 14 January 2025.

<sup>565</sup> SAR reg.№ЦУ-РД05-123/27.02.2024.

<sup>566</sup> SAR, reg. №АД-07-7 from 14 January 2025.

<sup>567</sup> See, the paragraph above, National context.

<sup>568</sup> COM No.145 from 10 March 2022.

<sup>569</sup> 143rd Coordination meeting held on 16 December 2025.

the country usually experiences the lowest numbers of the new arrivals due to winter weather conditions. Notwithstanding, the constantly decreasing reception capacity of the SAR (see, [Overview of the main changes, Reception centers](#)) would be raising serious concerns due to the high likelihood of overcrowding throughout spring to autumn months, if it was not for the high (78%)<sup>570</sup> absconding rate of Afghan applicants and the rising (30%)<sup>571</sup> absconding rates registered for Syrian applicants at the end of 2025. The absconding rate for Syrians increased significantly after the SAR shifted its policy, from treating these applications as manifestly founded to conducting individual assessment and determination, which resulted in higher refusal rates (see, [H. Differential treatment of specific nationalities in the procedure](#)). The main reason for Afghan absconding is likely attributable the low recognition rates for this nationality (see, [H. Differential treatment of specific nationalities in the procedure](#)). As a consequence, many Afghan applicants do not wish to continue their asylum process in Bulgaria (see [Differential treatment of specific nationalities in the procedure](#)).

273 asylum seekers resided in reception centres as of the end of 2025, thereby marking an occupancy rate of 11%.

Wherever possible, there is a genuine effort to accommodate nuclear families together and in separate rooms. Single asylum seekers are accommodated together with others, although conditions vary considerably from one centre to another. Some of the shelters are used for accommodation predominantly of a certain nationality or nationalities. For example, **Vrazhdebna** shelter in Sofia accommodated predominantly Syrians and Iraqis, **Voenna Rampa** shelter in Sofia accommodates predominantly Afghan and Pakistani asylum seekers, while the other reception centres accommodate mixed nationalities, such as in **Harmanli** reception centre, **Banya** reception centre and **Ovcha Kupel** shelter in Sofia. Since the end of 2024 and throughout 2025, the oldest reception facility of Ovcha Kupel shelter in Sofia which is at a state of complete dilapidation remained to be used as accommodation solely for unaccompanied children in the safe-zone area, managed by IOM.

Alternative accommodation outside the reception centres is allowed under the law, but only if it is paid by asylum seekers themselves and if they have consented to waive their right to social and material support.<sup>572</sup> They must submit a formal waiver from their right to accommodation and social assistance, as warranted by law, and declare to cover rent and other related costs at their own expenses.<sup>573</sup> Except for the few asylum seekers who are able to finance private accommodation on their own, another group of individuals living at external addresses is that of Dublin returnees, to whom the SAR applies the exclusion from social benefits, including accommodation, as a measure of sanction in accordance with the law (see [Withdrawal of Reception Conditions](#)).<sup>574</sup>

## 2. Conditions in reception facilities

### Indicators: Conditions in Reception Facilities

1. Are there instances of asylum seekers not having access to reception accommodation because of a shortage of places?  Yes  No
2. What is the average length of stay of asylum seekers in the reception centres? 1 to 18 months
3. Are unaccompanied children ever accommodated with adults in practice?  Yes  No
4. Are single women and men accommodated separately?  Yes  No

<sup>570</sup> 1,969 terminated procedures out of all 1,980 Afghan applicants.

<sup>571</sup> 4,357 terminated procedures out of all 7,646 Syrian applicants.

<sup>572</sup> Article 29(9) LAR.

<sup>573</sup> Ibid.

<sup>574</sup> Article 29(4) LAR.

## State of the facilities

Since 2015 conditions in national reception centres in general have been deteriorating and as a whole, substandard, with support limited to accommodation, nutrition and rudimentary medical help without provision of psychological care or assistance.<sup>575</sup> In 2022 an SAR internal revision of the reception centres' capacity revealed it<sup>576</sup> to be far below long-time stated 5,160 places, mainly because the designated premises were unfit for living. In 2025, SAR reported just 3,125 places available for accommodation<sup>577</sup> in all of its reception centres. The asylum agency continued to be severely underfunded in general. The SAR annual budgets were,<sup>578</sup> respectively, in 2021: 10,689,700 BGN; in 2022:14,095,300 BGN; in 2023: 12,038,218 BGN and in 2024: 11,717,200 BGN. The only budget allocated for repairs or refurbishment<sup>579</sup> of the reception centers was of 145,000 BGN in 2022 with no such means allocated in 2020, 2021, 2023 or 2024 annual budgets of the asylum agency. In 2025 however, the new politically appointed SAR leadership<sup>580</sup> received a budget of BGN 16,000,000, of which BGN 3,900,000 solely for capital investments and refurbishment. Notwithstanding, reception centres accommodating applicants during their asylum procedure continued to face persistent issues related to infrastructure and living conditions, often falling below basic standards.

As a consequence, reception centers where applicants are accommodated pending their asylum procedure continued to present recurring problems regarding infrastructure and material conditions, which in many instances were substandard and did not ensure even the most basic services relating nutrition and sanitation of personal and communal spaces. Regular water, hot water, repair of utilities and equipment in bathrooms, rooms and common areas remained extremely problematic due to the lack of budget. Vermin infestation, such as bedbugs, lice, cockroaches and rats also remain among the most persisting problems in reception centres for many years. The oldest reception facility of Ovcha Kupel shelter in Sofia is found to be at a state of complete dilapidation to the extent that at a certain point the SAR management considered its full closure.<sup>581</sup> At the end of 2025, the only space of this centre which continued to be used for accommodation was the safe zone for the unaccompanied children, managed by IOM. Occupants from all reception centres, except **Pastrogor** transit center, continued to complain about the living conditions, especially regarding bedbugs which regularly cause health issues, i.e. perpetual skin inflammations and allergic reactions. This problem arose after 2013, was continuously neglected until 2023 and remains a very serious issue to this day, despite the regular disinfections made throughout 2025.<sup>582</sup>

Food in reception centres was provided through catering arrangements to deliver three meals per day. As catering providers are selected regionally based on the lowest price offer<sup>583</sup> these vary among the different reception centres. Thus, in Ovcha Kupel, Voenna Rampa and Vrazhdebna shelters in Sofia reception centre these three meals per day were delivered at the price of BGN 5.38, equal to EUR 2.75; in Harmanli reception centre - at the price of BGN 6.54, equal to EUR 3.35; in Banya reception centre – at the price of BGN 6.24, equal to EUR 3.20; and in Pastrogor transit centre – at the price of BGN 6.01, equal to EUR 3.08 daily. The individual monthly allowance provided for in the law is not translated into practice as it is not provided since 2015.<sup>584</sup> For this reason, in 2025 asylum seekers continued to complain not only about food quality, but also about its insufficient quantity. The main factor that helped avoiding a point of critical malnutrition for asylum seekers remained the high rate of absconding and abandonment of the procedure, which in 2025 was 34% of all cases.

---

<sup>575</sup> See, AIDA Country Updates on Bulgaria: Forth Update from October 2015, 2016 Update from February 2017, 2017 Update from February 2018, 2018 Update from January 2019, 2019 Update from February 2020, 2020 Update from February 2021 and 2021 Update from February 2022.

<sup>576</sup> 118<sup>th</sup> Coordination meeting held on 22 December 2022.

<sup>577</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>578</sup> SAR reg. №АД-07-47 from 9 December 2024.

<sup>579</sup> SAR reg.№ЦУ-РД05-123/27.02.2024.

<sup>580</sup> See, [National context](#).

<sup>581</sup> 129<sup>th</sup> Coordination meeting, 9 May 2024.

<sup>582</sup> SAR, reg. №ПО-02-115 from 22 February 2026: disinfections carried out in all centres on a monthly basis.

<sup>583</sup> National Statistical Institute, Annual inflation rates: +2.2% in 2024; +9.5% in 2023; and +17% in 2022, available in Bulgarian [here](#).

<sup>584</sup> SAR, Order No 31-310, 31 March 2015, issued by the Chairperson Nikola Kazakov.

The access of asylum seekers to repeated and specialized healthcare and medical treatment remained impeded due to the country's fundamental shortage of general practitioners. Therefore, medical care of asylum seekers was mainly carried out in the surgeries organised in Sofia and Harmanli reception centres, with a total of 3,298 initial medical examinations and 2,144 outpatient examinations conducted in 2025,<sup>585</sup> provided in reception centres by 4 doctors, 1 dentist, and 5 nurses. Even though asylum seekers are health insured, due to its budget restraints SAR fail to meet the medical expenses, which are not covered by the National Health Insurance Fund (NHIF). These costs as well as those for prescribed medicines, lab tests or other medical interventions which are not covered in the health care package, as well as for purchase of baby formula, diapers and other personal hygiene products were provided by UNHCR, UNICEF and the Red Cross.<sup>586</sup>

For many years, the most serious concern relating national reception conditions remained the lack safety and security for asylum seekers accommodated in reception centres. These continued to be seriously compromised due to the presence of smugglers, drug dealers and sex workers who had access to all reception centres during the night hours without any interference from the private security guards. The SAR has been receiving many public disorder complaints both in Sofia and Harmanli, which escalated in public demonstrations and committees requesting the reception facilities to be either closed or turned to closed-type centres.<sup>587</sup> In 2022<sup>588</sup> and 2023,<sup>589</sup> a non-governmental organisation continued raising concerns regarding safety of reception centres. Starting from mid-2022, the SAR submitted several requests to the Ministry of Interior,<sup>590</sup> to engage the police in guarding of the reception centres, but the MOI initiated a procedure in this sense only by the end of 2023,<sup>591</sup> to investigate the possibility for SAR reception centres to be guarded by the national police and gendarmerie. In April 2024, additional amendments to the law were made,<sup>592</sup> but the MOI took over the guarding of the reception centres of the SAR as late as in October 2025.<sup>593</sup> This major change is expected to improve the safety and security of asylum seekers who are accommodated in the reception centres.

Some level of standardisation has taken place in the intake and registration procedure in reception centres. There is a basic database of residents in place, which is updated daily. However, there is an ongoing competition among asylum seekers to be accommodated in premises/rooms found to be in a better condition than others, thus corruption among SAR staff, who deals with accommodation issues, is widespread. For example, throughout 2023 and 2024 the BHC office in Harmanli and Sofia reception centres received accounts from asylum seekers that SAR employees continued to collect money from asylum seekers for different 'services', e.g. changing the room with one in better condition, accelerating the decision-making, etc. From 1 January 2025 UNHCR ceased funding Red Cross and Bulgarian Helsinki Committee's reception rooms at SAR centres, which prevented any further monitoring with respect to these, and other complaints or grievances of resident asylum seekers.

The law does not limit the length of asylum seekers' stay in a reception centre. Asylum seekers can remain in reception centres pending the appeal procedure against a negative decision.<sup>594</sup> In December 2025, the SAR reported to have its reception occupancy at 8%, i.e. 273 occupants out of 3,125 available places,<sup>595</sup> compared to 49% or 1,579 occupants at the end of 2024; 2,736 at the end of 2023; 2,412 occupants at

<sup>585</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>586</sup> Ibid.

<sup>587</sup> DW, 'След побоя в София: спусъкът с "Мигранти вълн!", 11 March 2024, available in Bulgarian [here](#); 24 Hours, 'Рехав протест против бежанците се проведе в София, 31 March 2024, available in Bulgarian [here](#); BTV, Протест срещу бежанците в Харманли: Хората настояват те да бъдат преместени извън града, 22 March 2024, available in Bulgarian [here](#); BNR, Жители на Харманли отново протестираха срещу бежанския център, 6 April 2024, available in Bulgarian [here](#).

<sup>588</sup> Bulgarian Helsinki Committee, reg.No.Б-67 from 4 August 2022.

<sup>589</sup> Bulgarian Helsinki Committee, reg.No.Б-88 from 18 September 2023.

<sup>590</sup> SAR, reg. No. №РД05-31 from 15 January 2024; SAR reg. №АД-07-7 from 14 January 2025.

<sup>591</sup> 127<sup>th</sup> Coordination meeting, held on 28 December 2023.

<sup>592</sup> Article 14, para 5 of the Law on Ministry of Interior, St.G. №33 from 12 April 2024; Bulgarian national television, 'МВР ще охранява центровете за бежанци, решиха депутатите', available in Bulgarian [here](#).

<sup>593</sup> SAR, 2024 Annual Activity Report, published in May 2025, available [here](#) in Bulgarian.

<sup>594</sup> Article 29(4)-(9) LAR.

<sup>595</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

the end of 2022; 2,447 occupants at the end of 2021; 1,032 occupants at the end of 2020, and 461 occupants at the end of 2019.

## C. Employment and education

### 1. Access to the labour market

#### Indicators: Access to the Labour Market

- |  |   |
|--|---|
| 1. Does the law allow for access to the labour market for asylum seekers?<br>❖ If yes, when do asylum seekers have access the labour market? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No<br>3 months |
| 2. Does the law allow access to employment only following a labour market test?  | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No             |
| 3. Does the law only allow asylum seekers to work in specific sectors?<br>❖ If yes, specify which sectors                                    | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No             |
| 4. Does the law limit asylum seekers' employment to a maximum working time?<br>❖ If yes, specify the number of days per year                 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No             |
| 5. Are there restrictions to accessing employment in practice?   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No             |

Currently, the LAR allows for access to the labour market for asylum seekers, if the determination procedure takes longer than 3 months from the lodging of the asylum application.<sup>596</sup> The permit is issued by the SAR itself in a simple procedure that verifies only the duration of the status determination procedure and whether it is still pending.

In January 2018, the Ministry of Labour and Social Policy attempted to amend the law and condition the asylum seekers' access to the labour market on numerous additional and unfeasible requirements,<sup>597</sup> but the joint lobbying of the SAR, UNHCR and non-governmental organisations prevented the amendment from being voted, and preserved the status quo.

Once issued, the permit allows access to all types of employment and social benefits, including assistance when unemployed. Under the law, asylum seekers also have access to vocational training.<sup>598</sup>

In 2025, the State Refugee Agency issued 847 work permits to asylum seekers who were looking to support themselves while their asylum claims were being processed.<sup>599</sup> Out of them, only 2% or 3 asylum seekers and 16 persons granted international protection were employed through employment programs, while the rest found work independently and on their own initiative.<sup>600</sup> At the same time, a total of 315 persons with temporary protection were employed through employment programs.<sup>601</sup>

In practice, it is still difficult for asylum seekers to find a job, due to the general difficulties resulting from language barriers, the recession and high national rates of unemployment. Comprehensive statistics on the number of asylum seekers in employment is not collected, except for those officially registered as seeking employment.<sup>602</sup>

<sup>596</sup> Article 29(3) LAR.

<sup>597</sup> National Parliament, Law on Amendment of the Law on Labour Migration and Labour Policy, 802-01-1, 2 January 2018, available in Bulgarian at: <https://bit.ly/2FGQ0sK>.

<sup>598</sup> Article 39(1)(2) LAR.

<sup>599</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>600</sup> Employment Agency, reg. No. РД-08-16 from 7 January 2026.

<sup>601</sup> Ibid.

<sup>602</sup> Ibid.

## 2. Access to education

### Indicators: Access to Education

1. Does the law provide for access to education for asylum-seeking children?  Yes  No
2. Are children able to access education in practice?  Yes  No

Access to education for asylum-seeking children is provided explicitly in national legislation without an age limit.<sup>603</sup> The provision not only guarantees full access to free of charge education in regular schools, but also to vocational training under the rules and conditions applicable to Bulgarian children.

In practice, there are some obstacles related to the methodology used to identify the school grade the child should be directed to, but this problem should be solved by the appointment of special commissions by the Educational Inspectorate with the Ministry of Education and Science. The increasing number of applicant children prompted more focus on their education. Overall, 27 asylum-seeking children started the school year in Bulgaria in 2025.<sup>604</sup>

In 2021 all children accommodated in reception centres were provided access to laptops, purchased by the Red Cross with AMIF co-funding, to secure children's online access to primary and secondary education. However, the management of the SAR, appointed in 2022, was not able to locate any of these laptops.<sup>605</sup>

Asylum-seeking children with special needs do not enjoy alternative arrangements other than those provided for Bulgarian children.<sup>606</sup>

Moreover, asylum-seeking children may be detained in closed reception centres or facilities following the detention of their parents.<sup>607</sup> This could deprive children of their right to education as accommodation in closed centres would effectively prevent them from accessing education, unless arrangements are put in place to secure their transportation to the public schools. No practice is yet applied in this respect.

Adult refugees and asylum seekers have the right to access vocational training. Practical obstacles may be encountered by asylum seekers in relation to access to universities as they have difficulties to provide proof regarding diplomas already acquired in their respective countries of origin. This is due to a lack of relevant information on diplomas. The academic autonomy of Bulgarian universities largely prevented the adoption of common government rules that would allow facilitated access for beneficiaries of international protection, taking into account their special circumstances and limited possibility to obtain official documents from their countries of origin.

## D. Health care

### Indicators: Health Care

1. Is access to emergency healthcare for asylum seekers guaranteed in national legislation?  Yes  No
2. Do asylum seekers have adequate access to health care in practice?  Yes  Limited  No
3. Is specialised treatment for victims of torture or traumatised asylum seekers available in practice?  Yes  Limited  No
4. If material conditions are reduced or withdrawn, are asylum seekers still given access to health care?  Yes  Limited  No

<sup>603</sup> Article 26(1) LAR.

<sup>604</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>605</sup> SAR, reg. No.РД05-72 from 26 February 2023 / SAR, reg. No. №РД05-31 from 15 January 2024.

<sup>606</sup> National Integration Plan for Children with Special Needs and/or Chronic Illness, adopted with Council of Ministers Ordinance No 6, 19 August 2002.

<sup>607</sup> Article 45e LAR.

Asylum seekers are entitled to the same level of health care as nationals.<sup>608</sup> Under the law, the SAR has the obligation to cover from its budget the health insurance fees of asylum seekers.

In practice, asylum seekers have access to available health care services but face the same difficulties as Bulgarian nationals in accessing them due to the general state of deterioration in the national health care system, that suffers from great material and financial deficiencies. In this situation, special conditions for treatment of torture victims and persons suffering mental health problems are not available. According to the law, medical assistance cannot be accessed if reception conditions are reduced or withdrawn.

Until 31 December 2018, Dublin returnees faced significant obstacles in accessing medical care upon return, mainly resulting from the delay for the asylum and health care administration to restore their insurance coverage in the national health care database. Since 1 January 2019 the health care database has been re-organised to automatically restore the Dublin returnees' health care status and register them as individuals with uninterrupted medical insurance as soon as their asylum procedures is being reopened at the SAR. However, this has not applied to those who left Bulgaria prior 1 January 2019, and who have been returned under Dublin III. In order for them to access medical care, the SAR must issue a written notification to the national IRS. Only then can the access to the medical care be restored, which takes couple of days in the majority of the cases, although there have been cases in which it took longer periods of time. To solve the issue, in 2020 the law was amended to explicitly provide uninterrupted health care rights for asylum seekers whose procedures were re-opened after being previously discontinued - a situation that typically applies to Dublin cases.<sup>609</sup> This arrangement, however, is not applicable to the Dublin returnees whose applications have been decided on the substance *in absentia* before their return to Bulgaria. In practice, Dublin returnees whose procedures were reopen experience delays of a couple of weeks before being able to re-access the health care system. The problem stems from the old system for electronic data sharing between SAR's and MOI's database, the latter used by all the rest government agencies to check current legal statuses of third country nationals, i.e. migrants, asylum seekers and beneficiaries of international protection.

Presently, all reception centres are equipped with consulting rooms and provide basic medical services, but their scope varies depending on the availability of medical service providers in the particular location. Bulgaria's fundamental shortage of general practitioners is the main reason the medical care of asylum seekers is mainly carried out in the surgeries organised in Sofia and Harmanli reception centres.

Basic medical care in reception centres is provided either through own medical staff or by referral to emergency care units in local hospitals. Also, in the framework of an AMIF project supported by Caritas in partnership with UNICEF, a new mobile ambulance unit operated in Sofia with a nurse providing health counselling and basic medical care, and an ambulance available to transport patients to health facilities.<sup>610</sup>

A total of 2,144 outpatient examinations were implemented in the reception centres' surgeries throughout 2025.<sup>611</sup> However the access of asylum seekers to following and specialized medical treatment remained impeded.

---

<sup>608</sup> Article 29(1)(5) LAR.

<sup>609</sup> Article 29(8) LAR.

<sup>610</sup> EUAA, Annual Asylum Report (2023), available at: <https://bit.ly/3JbdHYK>.

<sup>611</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

## E. Special reception needs of vulnerable persons

### Indicators: Special Reception Needs

1. Is there an assessment of special reception needs of vulnerable persons in practice?  
 Yes  No

The law provides a definition of vulnerability. According to the provision “applicant in need of special procedural guarantees” means an applicant from a vulnerable group who needs special guarantees to be able to benefit from the rights and comply with the obligations provided for in the law.<sup>612</sup> Applicants who are children, unaccompanied children, disabled, elderly, pregnant, single parents taking care of underage children, victims of trafficking, persons with serious health issues, psychological disorders or persons who suffered torture, rape or other forms of psychological, physical or sexual violence are considered as individuals belonging to a vulnerable group.<sup>613</sup>

There are no specific measures either in law or in practice to address the needs of these vulnerable categories, except for some additional practical arrangements in place to ensure the provision of medication or nutrition necessary for certain serious chronic illnesses, e.g. diabetes, epilepsy, etc. The law only requires that vulnerability has to be taken into account when deciding on accommodation, but this is applied discretionally, and no guidelines on the application of such a criterion are provided by the SAR. In 2018, the SAR adopted new internal rules of procedure whereby social experts provide assistance to its staff during the initial medical examination so as to enable the early identification of vulnerable applicants and their special needs.<sup>614</sup> If an applicant is identified as vulnerable, the new rules foresee that the vulnerability will be added to the registration form, including a detailed explanation and a follow-up assessment to be described in an appendix. Additionally, an early identification questionnaire was established for applicants who experienced traumatising experiences in order to determine their special needs and to facilitate the referral to adequate psychological or medical care.<sup>615</sup>

### Monitoring in 2025

In 2025, both vulnerability assessments and identification - as well as all follow-ups on identified cases -, remained substandard, to the point this continued to represent the most significant violation of existing obligation in the context of the asylum procedure in the course of already several years.<sup>616</sup> SAR social workers conducted a total of 273 vulnerability assessments and identified 115 applicants<sup>617</sup> with vulnerabilities or special needs. SAR acknowledged<sup>618</sup> to have dealt with 1,127 applicants with vulnerabilities as defined by the law in 2025. These figures obtained through monitoring indicated that just 24% of all asylum applicants with vulnerabilities received proper assessments of their needs. Moreover, SAR affirms<sup>619</sup> that the social experts who carry out the vulnerability assessment do file their assessments and support plans in the case management registry for the case worker to be able to review and collect them into the respective individual file, while copies of these documents remain with the social experts for subsequent work with the vulnerable person, according to the planned activities. In 2025, the monitoring of these processes established<sup>620</sup> that in 88% of the cases, an initial assessment form was present in the file of asylum seekers who were falling within the vulnerability definition under national law.<sup>621</sup> Thus, vulnerability assessments and support plans were still missing in 12% of the monitored cases of asylum

<sup>612</sup> Additional Provision 1(16) LAR.

<sup>613</sup> Additional Provision 1(17) LAR.

<sup>614</sup> Article 29 SAR Internal Rules of Procedure; SAR, Internal Rules of Procedure for assessing and granting international protection, adopted on 17 December 2018.

<sup>615</sup> Early Identification and Needs Assessment form (ФИОН), Individual Support and Referral Plan form (ФИПП) and Social Consultation form (ФСК).

<sup>616</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>; see, also AIDA 2024 and 2023 Country Updates.

<sup>617</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>618</sup> Ibid.

<sup>619</sup> Ibid.

<sup>620</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>.

<sup>621</sup> §1(17) Additional Provisions, LAR.

seekers, who otherwise should have been assessed and supported as persons with specific needs or vulnerabilities. The subsequent support plan however, was present in just 20% of the cases, and in 100% of them no information was available whether any of the support measures, included in the plan were actually implemented or not. Therefore, in 2025 need assessments as well as planning and provision of support measures with respect to applicants with identified vulnerabilities were still carried out unsystematically.

The situation of an applicant belonging to a vulnerable group has to be taken into account by the authorities when deciding on accommodation.<sup>622</sup> In practice, except the two safe-zones for unaccompanied children, other separate facilities for vulnerable applicants, families, single women or traumatised asylum seekers do not exist in the reception centres.

Families, single women and traumatised asylum seekers are not accommodated in separated facilities, but in separate floors in the reception centres' facilities, mainly due to the overall lack of SAR reception capacity.<sup>623</sup> There is no formal policy to prevent mixed-sex accommodation, however in practice the single women and the families are accommodated in separate floors in Sofia centres and separate buildings in Harmanli reception centre. These floors are equipped with separate toilets and bathrooms. No specific measures are put in place in reception centres to prevent gender-based violence, except separate accommodation of single women, families and safe-zone for the unaccompanied children. All SAR social workers are female; however, the interviewers and the interpreters often are not from the same sex as the asylum seeker, and the information about the right to have an interpreter or interviewer from the same sex is not provided in all cases. In 2025, just 17% of the cases the applicant was informed about the possibility to request an interviewer of the same gender, and only in 13% about the possibility to request an interpreter of the same gender.<sup>624</sup>

## 1. Reception of unaccompanied children

In July 2017, the State Agency for Child Protection and national stakeholders developed SOPs to safeguard unaccompanied migrant and refugee children identified to be present in Bulgaria. Although the SOPs for unaccompanied children were endorsed by the National Child Protection Council,<sup>625</sup> the final formal endorsement by the government has not been formally given up to the moment, which makes the developed SOPs for unaccompanied children inapplicable in practice. In 2025, despite the regular government which governed for the majority of the year from 16 January 2025 to 19 February 2026 (see, [Overview of the main changes](#)) in practice no legal or institutional arrangements were put forward in the field of asylum and international protection. As of 31 December 2025, no progress was achieved in this regard (see section on [Identification](#)).

The two safe zones for unaccompanied children at the Sofia reception centre continued to be maintained under an IOM project, funded by AMIF until the end of 2025. In May 2024, a third safe zone dedicated to hosting children with a capacity for 98 places was open<sup>626</sup> in the biggest reception centre in Harmanli, following a collaboration with UNICEF and IOM, funded by the Swiss State Secretariat for Migration (SEM). Overall, the conditions in the safe zones were better compared to all other SAR accommodation premises. The abovementioned serious security problems existing in reception centres and their surroundings in 2025 however affected the overall safety of unaccompanied children as well, although improvements in this respect are expected following the security being handed over to the police in November-December 2025 (see Conditions in reception facilities). In 2025, the number of unaccompanied

---

<sup>622</sup> Article 29(4) LAR.

<sup>623</sup> See [Overview of the main changes since the previous report update](#).

<sup>624</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring Report, 31 January 2026, available at: <https://bit.ly/3Jkd3t0>

<sup>625</sup> State Agency for Child Protection, 'Тридесет и шестото редовно заседание на Националния съвет за закрила на детето се проведе в зала „Гранитна“ на Министерски съвет', 11 July 2017, available in Bulgarian at: <http://bit.ly/2FzwLxk>.

<sup>626</sup> SAR, Откриване на сигурна зона за непридружени деца-бежанци в РПЛЦ-Харманли, 16 May 2024, available in Bulgarian [here](#).

children who sought protection in Bulgaria decreased by 48%.<sup>627</sup> Despite this drop, the capacity of the three safe zones (a total of 386 places<sup>628</sup>) would still be insufficient to shelter all newcomers were it not for the extremely high (92%) absconding rate for this group of asylum seekers.

The LAR provides that unaccompanied children are accommodated in families of relatives, foster families, child shelters of residential type, specialised orphanages or other facilities with special conditions for unaccompanied children.<sup>629</sup> In practice, none of these opportunities was used or applied until 2022, when the SAR began to actively search for opportunities to accommodate unaccompanied children in licensed family-type children's centres (ЦХСТ). During the procedure such efforts were undertaken with regard mainly to minor asylum-seeking children, children with special needs or such identified as being at increased risk of trafficking or harm. After the recognition these efforts targeted all unaccompanied children, excluding those in family reunification procedures, who were allowed to wait the reunification with their parents or other family members in SAR reception centres.<sup>630</sup> Starting from 2022, SAR has finally begun investing systematic efforts to accommodate unaccompanied children to specialized child care facilities, and in 2025 continued to gradually increase<sup>631</sup> the number of the children who were able to benefit by this type of accommodation that is well suited to address children's needs. As a result of this positive practice, in 2025 41 unaccompanied children were accommodated in specialized childcare centres. Out of this number, 11 were asylum seeking children and 30 children granted international protection. Altogether eleven licensed childcare centres have engaged in this practice in localities across the country, namely in Sofia, Burgas, Vidin, Ruse, Kardzhali, Novo Selo and Zvanichevo. At the same time, some challenges emerge in practice: first of all, the staff of the childcare centre lacks specialized training to work with unaccompanied children seeking or granted protection; secondly, the provision of interpretation services is not always ensured, at least for the initial period of accommodation and adjustment. Altogether ten licensed childcare centres have engaged in this practice in localities across the country, namely in Sofia, Burgas, Vidin, Ruse, Kardzhali, Novo Selo and Zvanichevo. At the same time the lack of specialized training of the childcare centre's staff to work with unaccompanied children seeking or granted protection should be acknowledged and taken into account.

## 2. Reception of victims of violence

Back in 2008, the SAR and UNHCR adopted standard operating procedures (SOPs) with respect to treatment of victims of Sexual and Gender-based Violence (SGBV).<sup>632</sup> In 2014, both agencies agreed that the SOPs need to be updated,<sup>633</sup> as they have never been applied in practice, but also to include other categories applicants with special needs. At the end of 2021, SAR endorsed the revisions, but the NGOs monitoring could not confirm any implementation of the SGBV SOPs in practice until the end of 2025.<sup>634</sup>

## F. Information for asylum seekers and access to reception centres

### 1. Provision of information on reception

There are no specific rules for information provided on rights and obligations relating to reception conditions. Asylum seekers obtain the necessary information on their legal status and access to the labour

---

<sup>627</sup> 2024: 2,601 unaccompanied children; 2023: 3,843 unaccompanied children / 2022: 3,348 unaccompanied children / 2021: 3,172 unaccompanied children.

<sup>628</sup> SAR reg. №АД-07-7 from 14 January 2025.

<sup>629</sup> Article 29(10) LAR.

<sup>630</sup> SAR, Rules and procedures on the accommodation of unaccompanied children granted international protection in foster families, social or integrated socio-medical care facilities for children of a residential type, adopted in October 2022.

<sup>631</sup> Ibid., 2022: 26 children (2 asylum seeking and 24 granted protection); 2023: 43 children (2 asylum seeking and 41 granted protection); 2024: 62 children (4 asylum seeking and 58 granted protection).

<sup>632</sup> Standard Operating Procedures on sexual and gender-based violence, Exh. No 630, 27 February 2008.

<sup>633</sup> UNHCR, SGBV Task Force, established on 15 February 2014.

<sup>634</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

market through the information sources with regard to their rights and obligations in general (see section on [Information on the Procedure](#)).

The SAR has an obligation to provide information in a language the asylum applicant can understand within 15 days from filing their application, which has to include information on the terms and procedures and rights and obligations of asylum seekers during procedures, as well as the organisations providing legal and social assistance.<sup>635</sup> However, in reality this is not provided within the 15-day time period laid down in Article 5 of the recast Reception Conditions Directive. In practice, prior to the increased number of asylum seekers, this information was given upon the registration of the asylum seeker in SAR territorial units by way of a brochure. Monitoring from the Bulgarian Helsinki Committee in 2025 established that oral guidance on determination procedures is provided by caseworkers in the majority of the cases (99%). It represented a significant progress in meeting legal requirements related to provision of information.<sup>636</sup>

Since 2018, some animated video information is available at the reception centres of the SAR to provide introductory information relating the rights and obligations during determination procedures. The animated videos are available in Arabic, Pashto, Dari and Kurdish Kurmanji. The law also envisages that additional information relating to the internal regulations applied in the closed centres have to be provided to asylum seekers detained therein, but this has not been delivered in practice (see [Conditions in Detention Facilities](#)).<sup>637</sup> The web platform [asylum.bg](#), which provides legal and practical information on national determination procedures is available also in audio format to ensure the access to credible information to illiterate asylum seekers.

In 2022, UNICEF developed for SAR special videos in Arabic and Farsi/Dari/Pashto languages targeting as audience the unaccompanied asylum seeking and refugee children. The videos aim to promote the specialized childcare facilities (ЛHCT) where the children should be accommodated after the recognition but also can be accommodated during the asylum procedure. Since mid-2022, the SAR began to actively search for opportunities to accommodate unaccompanied children in licensed family-type children's centres (ЛHCT). However, the majority of the children do hesitate to leave the familiar conditions of the reception centres. That is why the videos show-case other children who have been already accommodated in specialized childcare facilities who share their positive experience thus assisting to mitigate the existing prejudice among the children in reception centres and their anxiety in view of facing an unknown situation. This approach paid off and over three years since these videos started to be shown to children along other efforts invested to increase their knowledge and understanding, the number of those who actually found accommodation in national child-care facilities has been gradually increasing, namely - 26 children (2 asylum seeking and 24 granted protection) in 2022; 43 children (2 asylum seeking and 41 granted protection) in 2023; 62 children (4 asylum seeking and 58 granted protection) in 2024, and 41 children (11 asylum seeking and 30 granted protection) in 2025.

## 2. Access to reception centres by third parties

### Indicators: Access to Reception Centres

1. Do family members, legal advisers, UNHCR and/or NGOs have access to reception centres?  
 Yes       With limitations       No

The law does not expressly provide for access to reception centres for family members, legal advisers, UNHCR and NGOs. The law provides, however, that asylum seekers have the right to seek assistance from UNHCR and other government or non-governmental organisations.<sup>638</sup> Until the beginning of 2015, no limitations were applied in practice.

Presently, NGOs and social mediators from refugee community organisations who have signed

<sup>635</sup> Article 58(8) LAR.

<sup>636</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

<sup>637</sup> Article 45e(1)(5) LAR.

<sup>638</sup> Article 23(1) LAR.

cooperation agreements with the SAR are allowed to operate within the premises of all reception centres. Access to reception centres for other organisations and individuals requires a formal authorisation and is formally prohibited during the night. For many years, asylum seekers regularly reported that traffickers and smugglers as well as drug dealers and sex workers have almost unlimited access to reception centres, except for the **Vrazhdebna** shelter in **Sofia** (see [Conditions in Reception Facilities](#)). Starting from mid-2022, the SAR submitted several requests to the Ministry of Interior<sup>639</sup> to engage the police in guarding of the reception centres, but it was not before the end of 2023 when MOI initiated a procedure,<sup>640</sup> to investigate the possibility for SAR reception centres to be guarded by the national police and gendarmerie. In April 2024 additional amendments to the law were made,<sup>641</sup> but only from November 2025 did the MOI took over the guarding of the reception centres of the SAR, starting with Sofia and Harmanli ones. This major change is expected to seriously improve the safety and security of asylum seekers who are accommodated in the reception centres during their procedure.

Starting from 1 January 2025, the UNHCR ceased to support any legal or social counselling or assistance directly provided until then to asylum seekers in SAR reception centres through its NGO partners Red Cross, Bulgarian Helsinki Committee and Council of Refugee Women and left these kinds of services to be provided exclusively in its urban Compass centres. Therefore, in 2025 no direct services or assistance by NGOs or UNHCR were provided to asylum seekers in the SAR reception centres, except in Harmanli, where the Bulgarian Helsinki Committee has its regional office situated within the centre's compound. The situation is expected to deteriorate after 1 January 2026 following the closure due to UN financial crisis of the legal receptions of the Bulgarian Helsinki Committee in Sofia, Harmanli and, as of 30 June also in the closed facility of Pastrogor transit center<sup>642</sup>, which legal aid to this point had been operating for thirty years.

## G. Differential treatment of specific nationalities in reception

Up to the moment, no cases of discrimination based on nationality was reported concerning the reception system. However, until 2024 some of the reception centres were used for accommodation predominantly of a certain nationality or nationalities. Thus, **Vrazhdebna** shelter in Sofia accommodated predominantly Syrians and Iraqis, **Voenna Rampa** shelter in Sofia accommodates almost exclusively Afghan and Pakistani asylum seekers, while the other reception centres accommodate mixed nationalities, such as in **Harmanli** reception centre, **Banya** reception centre and **Ovcha Kupel** shelter in Sofia. The government had also assigned **Vrazhdebna** shelter in Sofia to host applicants coming through the relocation scheme in 2015-2017 as well as for those resettled from Türkiye. However, due to the SAR's budget constraints and decreasing reception capacity (see, [Overview of the main changes](#)) in 2025 all reception centres were accommodating mixed nationalities without any specific distribution, thus creating higher risks of conflicts.

---

<sup>639</sup> SAR, reg. No. №ПД05-31 from 15 January 2024; SAR reg. №АД-07-7 from 14 January 2025.

<sup>640</sup> 127<sup>th</sup> Coordination meeting, held on 28 December 2023.

<sup>641</sup> Article 14, para 5 of the Law on Ministry of Interior, St.G. №33 from 12 April 2024.

<sup>642</sup> Bulgarian Helsinki Committee, The BHC Legal Aid Reception for Refugees and Migrants ceased its operation on 1 January 2026, published on 12 January 2026, available [here](#).

## Detention of Asylum Seekers

### A. General

#### Indicators: General Information on Detention

1. Total number of asylum seekers detained in 2025: <sup>643</sup>	2,881
2. Number of asylum seekers in detention at the end of 2025:	11 <sup>644</sup>
3. Number of detention centres:	3
❖ Pre-removal detention centres	2
❖ Asylum detention centres	1
4. Total capacity of detention centres:	976

There are two pre-removal detention centres in operation: **Busmantsi** and **Lyubimets**. An additional container-type detention centre with capacity for 1,750 individuals was built in **Elhovo** Regional Border Police Directorate premises with the objective to serve as a buffer in a situation of mass arrivals from the global South. On 16 November 2022, the caretaker government<sup>645</sup> officially designated Elhovo detention centre to serve as a transit centre for re-distribution of newly arrived Ukrainian refugees despite its utterly unsuitable conditions, including due to its remote location, and the repeated protests that such decision sparked.<sup>646</sup> On 19 December 2025, SAR handed back the Busmantsi detention center to the Migration Directorate-MOI and designated the **Pastrogor transit center**, with a capacity of 216 persons, to serve therefrom as a closed reception facility for detention pending procedures for international protection. This increased overall national detention capacity to 976 places.

Asylum seekers can also be placed in closed reception centres i.e. detained under the jurisdiction of the SAR for the purposes of the asylum procedure. Throughout 2025, 49 asylum seekers were detained in the asylum closed facility, situated in the premises of the closed reception ward (*помещение от закрит мун, ПЗТ*) in the **Busmantsi** pre-removal centre, the only closed centre for that purpose. On 19 December 2025, the SAR handed back its closed reception ward (ПЗТ) in Busmantsi detention center to the Migration Directorate-MOI and transferred all asylum seekers detained pending their status determination to the **Pastrogor transit center**, designated therefrom to serve as closed asylum reception facility. In total, 10 asylum seekers were held there at the end of the year 2025.<sup>647</sup>

Not all persons who apply for international protection when apprehended at the border or inland are directly detained. For example, an exception is applied to unaccompanied children from July 2018, when a referral mechanism was included in the law,<sup>648</sup> although in practice the police apply it only with respect to unaccompanied children who are visibly minor and below 14 years of age.<sup>649</sup> In 2025, the Border police referred 54 children to childcare services, while children referred by the Migration Police were just 5 children.<sup>650</sup> The UN CAT Committee in its 2021 report<sup>651</sup> pointed to an amendment in Internal Instruction 81213-78 which provided that the child protection services with the Agency for Social Assistance (ASA) should be notified when an unaccompanied child has been identified by the immigration police in the

<sup>643</sup> This figure includes both applicants detained in the course of the asylum procedure and persons lodging an application from detention; source: Bulgarian Helsinki Committee's monthly situation reports January-December 2025

<sup>644</sup> As of 31 December 2025: 1 detention applicant in a pre-removal center and 10 asylum seekers in SAR closed asylum facility.

<sup>645</sup> COM No. 980 from 16 November 2022.

<sup>646</sup> Bulgarian Helsinki Committee, *Кой настанява украинските бежанци в лагера за задържане на мигранти в Елхово?*, published on 4 November 2022, available in Bulgarian at: <https://bit.ly/3YACdYW>.

<sup>647</sup> Bulgarian Helsinki Committee, *Monthly Situation report on December 2025*.

<sup>648</sup> LARB Regulations, amended with State Gazette No.57 from 10 July 2028, Articles 63k-63l.

<sup>649</sup> Bulgarian Helsinki Committee, *2024 Annual Progress report to UNICEF*, 15 January 2025.

<sup>650</sup> Ministry of Interior, *Migration statistics, December 2025*, available in Bulgarian at: <https://bit.ly/49xELgr/>.

<sup>651</sup> UN Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, *Comments of Bulgaria on the recommendations and observations addressed to it in connection with the Subcommittee visit undertaken from 24 to 30 October 2021*, published on 25 October 2022, available at: <https://bit.ly/3uMsZ2T>.

detention centre. In addition, the European CPT in its 2024 report<sup>652</sup> noted that although the Bulgarian law prohibits the detention of unaccompanied minors the delegation, observed in both immigration detention centers in Busmantsi and Lyubimets, and that they should be transferred to the custody of competent social services in order to provide them with suitable open accommodation in the community, such minors spent several days (usually up to a week) there while the authorities were in the process of verifying their identity and confirming that they were effectively unaccompanied. CPT also reiterated allegations that some of the formally accompanied minors were in fact unaccompanied, but the authorities had “appointed” unrelated adults with whom they had been apprehended as their relatives, thereby making it legally possible to accommodate them in a detention center. Therefore, and again in 2025 as in previous years<sup>653</sup>, the staff of detention centres still continued to opt for the quicker solution to assist unaccompanied children to apply for asylum in order to be able to hand them over to SAR reception centres.<sup>654</sup> The failure of national ASA child protection services to assist and take care of unaccompanied migrant, asylum seeking or refugee children has been reported repeatedly by the refugee assisting non-governmental organisations as illegal and discriminatory.<sup>655</sup>

Other exceptions from detention are arbitrarily applied by police authorities in cases where the border applicants have family members who are already in Bulgaria, when applicants provide valid documents, as well as when applicants have specific needs such as disabilities or infants.

Out of a total of 3,895 applicants registered in 2025, 2,680 individuals applied for asylum at border and immigration detention; while just 1.75% had a direct access to the asylum procedure at the border without being detained.<sup>656</sup> Firstly noticed in 2022, the SAR practice to render unhindered access to procedure of the predominant part of the so called ‘self-reported’ asylum seekers continued (see, [Asylum Procedure, 3. Registration of asylum application](#)). Asylum seekers considered ‘self-reported’ are those who managed to enter and reach SAR registration centres independently, without being apprehended by the police and detained. For many years, the asylum agency consistently refused to register them directly, instead alerting the police, which was arresting and detaining the self-reported asylum seekers in deportation centres of the Ministry of the Interior. In some cases, this malpractice was affecting families with minor children and pregnant women. This trend changed from 2022, when this practice affected a total of 94 persons (0.5%) out of 20,407 asylum seekers registered in the country. In 2023, only 48 asylum seekers (0.2%) out of 22,518 suffered from this practice, in 2024 83 asylum seekers (0.4%) out of all 12,250 asylum applicants, while in 2025 it affected 4 asylum seekers (0.1%) out of 3,895 persons who had lodged an asylum application.<sup>657</sup> No major irregularities in how the asylum procedures were conducted were registered in MOI deportation centres<sup>658</sup> in Lyubimets or Busmantsi<sup>659</sup> with just 1 asylum seeker (0.3%) out of all 2,860 detention applicants determined in immigration detention centers Following these improvements, some smugglers adapted quickly and began to deliver smuggled persons directly to open SAR reception centres in Harmanli, Banya and Sofia with many among them with settled representation by private practitioners and provided with registration at a false or irregular external address. In January

---

<sup>652</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16-23 September 2024, published on 6 August 2025, available [here](#).

<sup>653</sup> Bulgarian Helsinki Committee, December 2025 UNICEF Progress report, 10 January 2026.

<sup>654</sup> UN Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Comments of Bulgaria on the recommendations and observations addressed to it in connection with the Subcommittee visit undertaken from 24 to 30 October 2021, published on 25 October 2022, available at: <https://bit.ly/3uMsZ2T>.

<sup>655</sup> See, 2023 and 2024 AIDA Country updates.

<sup>656</sup> Bulgarian Helsinki Committee, Monthly Situation Report for December 2025: 28 out of all 1600 applicants apprehended at borders.

<sup>657</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/4bU9INC>.

<sup>658</sup> §5 Additional Clauses, LAR: SAR can implement asylum procedures outside its premises at places designated for this purpose by an order of the SAR Chairperson prior the establishment of its transit centers; the Pastrogor transit center was open on 3 May 2012. Source: Citybuild, available in Bulgarian [here](#).

<sup>659</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/4bU9INC>.

2025, the head of the Sofia Migration Directorate was arrested<sup>660</sup> for alleged corruption and among other, for alleged sanctioning of false address registrations to third country nationals.

There are several reasons for detention to be applied in most cases with respect to third country nationals apprehended at the borders or inside the country's territory. Instructions are given by the State Agency for National Security (Държавна агенция "Национална сигурност", ДАНС/SANS) to all police authorities not to transfer anyone to open reception centres before a screening and all security checks have been conducted. Another reason is the situation at the border with Türkiye. Along this main entry border, those who are apprehended are either pushed back, or they are allowed to continue with their smugglers, board on different vehicles, transit the country and exit without being stopped.<sup>661</sup> The direct access to asylum procedure is additionally hindered by the congested coordination between the police and the SAR to enable registration and accommodation of asylum seekers after 17:00 or during the weekends. From September 2015, the SAR began to operate shift schemes and on-call duty during the weekends in order to assist with the reception of asylum seekers referred by the police. This on-call scheme however was fully cancelled by the SAR from 2019 to mid-2022, when it was re-established and put into operation once again until September 2025 when it was again abandoned.

Detention of first-time applicants from the making of their application until their personal registration is systematically applied in Bulgaria and most asylum seekers apply from pre-removal detention centres for irregular migrants.<sup>662</sup>

Immigration detention in Bulgaria: 2016-2025										
Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Total detention orders	11,314	2,989	2,456	2,184	3,487	10,799	16,767	18,554	9,208	3,417

Source: MOI.

## B. Legal framework for detention

### 1. Grounds for detention

**Indicators: Grounds for Detention**

- In practice, are most asylum seekers detained
  - ❖ on the territory:  Yes  No
  - ❖ at the border:  Yes  No
- Are asylum seekers detained in practice during the Dublin procedure?
  - Frequently  Rarely  Never
- Are asylum seekers detained during a regular procedure in practice?
  - Frequently  Rarely  Never

#### 1.1 Pre-removal detention upon arrival

Under Article 44(6) of the Law on Aliens in the Republic of Bulgaria (LARB), a third-country national may be detained where:

- a. Their identity is uncertain;

<sup>660</sup> Bulgarian National Television, 'Началникът на отдел "Миграция" в СДВР е задържан с подкуп', 20 January 2025, available in Bulgarian [here](#).

<sup>661</sup> See, [Access to the territory and push-backs](#).

<sup>662</sup> CERD, Concluding observations on the combined twentieth to twenty-second periodic reports to Bulgaria, CERD/C/BGR/CO/20-22, 31 May 2017, available at: <http://bit.ly/2wSzlpq>, para 21(e).

- b. They are preventing the execution of the removal order; or
- c. There is a possibility of absconding.

The different grounds are often used in combination to substantiate detention orders in practice. In practice, detention of third-country nationals is ordered by the Border or Immigration Police on account of their unauthorised entry, irregular residence or lack of valid identity documents.

## 1.2 Short-term detention

At the end of 2016, the LARB introduced “short-term detention” to be used for security checks, profiling and identification.<sup>663</sup> The law entered into force on 6 June 2018.<sup>664</sup> After the amendments, police authorities can initially issue a detention order lasting for 30 calendar days within which period the Immigration Police can decide whether further detention grounds should be applied – determining the extension of the detention period - or if the individual should be referred to an open reception centre, if he or she has applied for asylum.

Short-term detention orders were frequently issued by the police until the summer of 2022 when, in attempt to give proof to EU institutions of the readiness of Bulgaria to join the Schengen zone, the caretaker cabinet’s MOI management instructed on direct application of long-term detention orders - with initial period of 6 months – without any prior consideration of personal circumstances or submitted asylum claim.

In general, the immigration police implement very few removals of detained third country nationals on an annual basis. In 2025, out of 3,417 third country nationals issued a detention order, the MOI carried out 1,210 removals<sup>665</sup>, which represented a 35% implementation rate.<sup>666</sup> For comparison, 11% or 1,015 third country nationals were returned in 2024, 565 in 2023, 582 in 2022, 770 in 2021 and 428 in 2020.<sup>667</sup> The rest of the detainees had to be released either on account of submitted first asylum applications, or because the ordered initial 6 months detention duration has expired. The inability of MOI to implement the removals is attributed to the fact that the overwhelming majority of the third country nationals originate from Syria (until 8 December 2024) or Afghanistan,<sup>668</sup> to which removal or return were legally and/or practically difficult. These circumstances made the majority of the detention orders not only issued without a legitimate purpose, but also pointless from a practical point of view.

In May 2022, the European Court on Human Rights issued a judgment which found the Bulgarian authorities in violation of Article 5(1) of the ECHR relating the length of the detention as it did not appear that the authorities took any active steps to check the realistic prospects of the removal; and that the reasons which initially justified the detention were no longer valid throughout the period of the applicant’s deprivation of liberty in light of the authorities’ failure to exercise sufficient diligence in carrying out that measure, therefore giving rise to a violation of Article 5(1).<sup>669</sup>

## 1.3 Registration and determination of asylum seekers in immigration detention

The law does not allow the SAR to conduct any determination procedures in the pre-removal detention centres.<sup>670</sup>

However, as of 2018 the SAR began to register, fingerprint, and conduct status determination of asylum

<sup>663</sup> Article 44(13) LARB.

<sup>664</sup> Law amending the Law on Aliens in the republic of Bulgaria, No 97/2016, 2 December 2016, available in Bulgarian at: <http://bit.ly/2kJoYpi>.

<sup>665</sup> MOI statistics, December 2025: 1359 removals minus 149 voluntary returns, available in Bulgarian [here](#).

<sup>666</sup> MOI statistics, December 2025, available in Bulgarian [here](#).

<sup>667</sup> Ibid.

<sup>668</sup> Ibid.

<sup>669</sup> European Court on Human Rights and Fundamental Freedoms, application No.35422/16 Ali Reza v. Bulgaria, Judgement from 17 May 2022, available at: <https://bit.ly/3kYRu8a>.

<sup>670</sup> Additional Provision 5 LAR; Article 45b LAR.

seekers' cases in pre-removal detention centres and to keep them there after issuing them asylum registration cards. The applicants release and access to asylum procedure was usually secured only by an appeal against detention and a court order for their release. In principle, this practice affected individuals who could more easily be returned, due to having valid passports or other original national identity documents. With the exception of subsequent applicants who are excluded by law from the right to remain in Bulgaria pending the admissibility assessment of their subsequent claims,<sup>671</sup> the asylum seekers processed in pre-removal detention centres were being determined by the SAR in an **Accelerated Procedure**, which stripped them of the right to an onward appeal and thereby prevents them from challenging the practice further before the Supreme Administrative Court. This malpractice was mostly supported by the courts, which found asylum procedures in pre-removal centres in violation of procedural standards, though this violation was considered insignificant one as the rights of asylum seekers were not severely affected.<sup>672</sup> In some limited cases, courts have ruled that the conduct of the personal interview in an immigration detention centre amounts to a serious breach of procedural rules.<sup>673</sup>

The detention of asylum seekers and failure to observe procedural safeguards form part of the concerns expressed by the European Commission in the letter of formal notice sent to Bulgaria on 8 November 2018 relating to non-compliance with the EU asylum *acquis*.<sup>674</sup>

In 2022, SAR management reversed and almost completely abandoned this malpractice,<sup>675</sup> with only 1 registration and only 1 determination conducted in Busmantsi detention centre. This approach was maintained in 2023, with just 1 procedure conducted in Lyubimets detention centre and 0 registrations and procedures in 2024, and 1 procedure in Busmantsi detention center 2025.<sup>676</sup>

#### 1.4 Asylum detention

Asylum seekers can also be placed in closed reception facilities i.e. detention centres under the jurisdiction of the SAR during the determination of their claim. The national grounds transpose Article 8(3)(a), (b), (d) and (f) of the recast Reception Conditions Directive, according to which an applicant may be detained:<sup>677</sup>

- (a) In order to determine or verify his or her identity or nationality;
- (b) In order to determine those elements on which the application for international protection is based which could not be obtained in the absence of detention, in particular when there is a risk of absconding of the applicant;
- (c) When protection of national security or public order so requires;
- (d) For determining the Member State responsible for examining an application for international protection lodged in one of the Member States by a third-country national or a stateless person.

In 2025, 49 asylum seekers were detained in the asylum closed facility, situated at the premises of the **closed reception ward (П3Т)** in the **Busmantsi** pre-removal detention centre, the only closed reception facility for that purpose. On 19 December 2025, SAR handed back the closed reception ward in the Busmantsi detention centre to the Migration Directorate-MOI, and designated the **Pastrogor transit**

---

<sup>671</sup> Article 76c(2) LAR.

<sup>672</sup> Administrative Court of Sofia, Decision No 5378, 17 September 2017; Decision No 4740, 14 July 2017; Decision No 5105, 2 August 2017, Decision No 193, 14 March 2017; Administrative Court of Haskovo, Decision No 187, 16 March 2017; Administrative Court of Haskovo, Decision No 93, Case No 1322/2017, 29 January 2018; Administrative Court of Sofia, 21st Division, Decision No 806, Case No 4161/2017, 12 February 2018; Administrative Court of Haskovo, Decision No 996, Case No 14229/2017, 19 February 2018; Administrative Court of Sofia, 57th Division, Decision No 7499, Case No 11273/2018, 11 December 2018.

<sup>673</sup> Administrative Court of Sofia, Decision No 977, 16 February 2018.

<sup>674</sup> European Commission, 'November infringements package: key decisions', MEMO/18/6247, 8 November 2018, available at: <https://bit.ly/2RETZfR>.

<sup>675</sup> Bulgarian Helsinki Committee, 2022 Annual RSD Monitoring report, 1.1.2. Procedure at the police detention centers, page 6, available at: <https://bit.ly/3Y3WzJJ>.

<sup>676</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/48C57wC>.

<sup>677</sup> Article 45b(1) LAR.

**center**, with a capacity of 216 persons to serve therefrom as a closed reception facility for detention pending procedures for international protection. 10 asylum seekers were held there at the end of the year 2025. The grounds of detention applied in these cases were verification of identity or nationality, risk of absconding on account of attempted irregular exit, and protection of national security or public order.

## 2. Alternatives to detention

### Indicators: Alternatives to Detention

1. Which alternatives to detention have been laid down in the law?  Reporting duties  
 Surrendering documents  
 Financial guarantee  
 Residence restrictions
2. Are alternatives to detention used in practice?  Yes  No

Alternatives to pre-removal detention in the general *immigration law* (LARB) do not specifically target asylum seekers, rather all third-country nationals. The LARB was amended in 2017 to introduce new alternatives, namely:

- ❖ Surrendering documents;<sup>678</sup>
- ❖ Financial guarantee;<sup>679</sup>
- ❖ Weekly reporting, already existing prior to the reform.<sup>680</sup>

The latter, however, may not be appropriate for new arrivals who do not have a place of residence.

In practice, in the overwhelming majority of cases, alternatives to detention are not considered by the Migration Directorate (MOI) prior to imposing detention.<sup>681</sup> The necessity to develop in practice alternatives to immigration detention, which are already included in national law, was raised in the report<sup>682</sup> of the CoE Special Representative of the Secretary General on Migration and Refugees, following a fact-finding mission conducted in September 2023. Regardless, the situation did not change in 2025.

The *asylum law* (LAR), for its part, envisages bi-weekly reporting to the SAR as a measure to ensure “the timely examination of the application” or to ensure “the participation” of the asylum seeker.<sup>683</sup> The LAR also envisages a limitation of freedom of movement in certain areas in the territory of the state by a decision of the SAR’s Chairperson, where asylum seekers can be obligated not to leave and reside in other administrative regions (district or municipality) than the prescribed one (see [Freedom of Movement](#)).

## 3. Detention of vulnerable applicants

### Indicators: Detention of Vulnerable Applicants

1. Are unaccompanied asylum-seeking children detained in practice?  Frequently  Rarely  Never
- ❖ If frequently or rarely, are they only detained in border/transit zones?  Yes  No
2. Are asylum seeking children in families detained in practice?  Frequently  Rarely  Never

<sup>678</sup> Article 44(5)(3) LARB.

<sup>679</sup> Article 44(5)(2) LARB.

<sup>680</sup> Article 44(5)(1) LARB.

<sup>681</sup> Bulgarian Helsinki Committee, Detention Mapping report Bulgaria, October 2016, available at: <http://bit.ly/2jluOxS>, 21.

<sup>682</sup> Council of Europe, Report of the fact-finding mission to Bulgaria by Ms. Leyla Kayacik, Special Representative of the Secretary General on Migration and Refugees (11-14 September 2023), published on 30 January 2024, available at: <https://bit.ly/3TIA2TD>.

<sup>683</sup> Article 45a LAR.

The general immigration law, LARB, prohibits the detention of unaccompanied children in general and imposes a maximum period of 3 months for the detention of accompanied children who are detained with their parents.<sup>684</sup>

The asylum law, LAR, provides for the possibility to detain accompanied children for asylum purposes as a measure of last resort, in view of ensuring family unity or ensuring their protection and safety, for the shortest period of time.<sup>685</sup> The position of UNHCR is that the respective provisions do not expressly refer to the primacy of the best interests of the child when ordering detention. They also do not incorporate sufficient guarantees to ensure speedy judicial review of the initial decision to detain and a regular review thereafter. Although presently expanded with additional alternative arrangements,<sup>686</sup> the law still does not envisage specific alternatives to detention appropriate for children such as alternative reception / care arrangements for unaccompanied children and families with children.

In practice, both asylum-seeking and other migrant unaccompanied children continue to be detained in pre-removal detention centres, managed by the Ministry of Interior. Unaccompanied children arrested by the Border or Immigration Police are assigned (“attached”) to any of the adults present in the group with which the children travelled, which has been a steady practice ongoing for last couple of years. Thus, the arrested unaccompanied children are not issued a separate detention order but instead listed as an “accompanying child” in the detention order of the adult to whom they have been assigned. The same treatment is applied by the regular police services to those unaccompanied children who are captured inside the Bulgarian territory and considered to be irregular due to the lack of identity documents. All of them without exception are transferred to the pre-removal detention centres in **Busmantsi** or **Lyubimets**. To do this, identical to the approach of the Border Police, the regular police authorities assigned (“attached”) the children to adults without collecting any evidence or statements for a family link or relation between them. This malpractice was also exposed by the European CPT in its 2024 report<sup>687</sup>, which noted that although the Bulgarian law prohibits the detention of unaccompanied minors the delegation, some of the formally accompanied minors were in fact unaccompanied, but the authorities had “appointed” unrelated adults with whom they had been apprehended as their relatives, thereby making it legally possible to accommodate them in a detention centre. In 2025, the Border and Migration Police referred only 59 children to respective child protection services with the Agency for Social Assistance, while in the same period 252 children were identified as unaccompanied in both national detention centre.<sup>688</sup>

The so-called “attachment” is implemented on the basis of a legal definition on extended relatives’ circle, who could be considered as “accompanying adults”; this definition is presently applicable only in immigration procedures.<sup>689</sup> National jurisprudence has however proved inconsistent in this regard.<sup>690</sup> At the end of 2017 the Ombudsperson assisted by the Bulgarian Helsinki Committee requested the Supreme Administrative Court to deliver mandatory interpretation of the law on this matter.<sup>691</sup> The Court started the examination of the case in 2019, and a decision was issued on 29 March 2021. In its decision, the Supreme Administrative Court noted that children detained as a result of the detention of their accompanying adult have their own right to appeal against the detention decision. The court also clarified that the information provided by the police on the relationship between children and accompanying adults is not binding, and that the authorities ordering the detention can further assess whether a relationship – and of which kind – exists.<sup>692</sup>

---

<sup>684</sup> Article 44(9) LARB.

<sup>685</sup> Article 45f(1) LAR.

<sup>686</sup> Article 44(5) LARB.

<sup>687</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16-23 September 2024, published on 6 August 2025, available [here](#).

<sup>688</sup> Bulgarian Helsinki Committee, December 2025 UNICEF report.

<sup>689</sup> Additional clauses § 2 LARB Regulations.

<sup>690</sup> See e.g. Supreme Administrative Court, 7th Department, Decision No 12271, 14 November 2016; Decision No 2842, 8 March 2017; Decision No 10789, 4 September 2017; Decision No 12116, 11 October 2017.

<sup>691</sup> Ombudsperson, Request No 11-78, 8 December 2017, available in Bulgarian at: <http://bit.ly/2DSflva>.

<sup>692</sup> Supreme Administrative Court, General Assembly, Case No.1/2019, 29 March 2021, available in Bulgarian at: <https://bit.ly/3FMWPUM>.

In 2021, the UN CAT Subcommittee expressed concerns about the detention of children highlighting the need to ensure humane conditions for detained migrants, especially children, and that detention should only be used when strictly necessary.<sup>693</sup>

An amendment to the LARB Regulations entered into force on 10 July 2018 to introduce rules and procedures for immediate and direct referral of unaccompanied migrant children from the police to the child protection services in order to avoid their detention.<sup>694</sup> The reform resulted in almost immediate change in the national police practices on detention of unaccompanied minor children below 14 years of age. In 2024, 70 unaccompanied children<sup>695</sup> were referred to child protection services without detention, all by the Border Police and 5 by the Migration Police. Children are assisted by the police and child care services to apply for asylum, thus ensuring their free and direct access to asylum procedure. This was also acknowledged by the UN CAT Subcommittee's report in 2021.<sup>696</sup>

In the cases of undocumented children from 14 to 18 years, whose age cannot be evidently established just through their appearance, the police continue to employ detention through "attachment" to unrelated adults or registration as adults. The child protection services have refused to credit their statements about their age and commenced implementation of age assessment based solely on X-ray wrist expertise prior to any referral to childcare services. Therefore, in 2019, amendments of the primary and secondary immigration legislation were adopted creating additional safeguards for a legally binding referral mechanism<sup>697</sup>. New procedures allowing the regularisation of rejected and migrant unaccompanied children were also introduced, with the possibility to extend their 'leave to remain' (i.e. their residence permit) on humanitarian grounds beyond adulthood.<sup>698</sup> At the end of 2019 an expert group representing both governmental and non-governmental organisations was established to create a national age assessment procedure based on a multidisciplinary approach. Some of these legal safeguards were thus included by the SAR to its LAR amendments.<sup>699</sup> The draft methodology on age assessments was finalised and referred for adoption to the government. However, due to the political instability and repeated general elections during 2021 to 2023 the national legislative agenda was significantly congested, which prevented the endorsement of the draft. In 2023, the age assessment methodology was finally adopted in as a formal Age Assessment Instruction.<sup>700</sup> However, it is applicable only to children in asylum procedures as the MOI opted out and was not included in the age assessment procedure or arrangements.

In 2025, the Bulgarian Helsinki Committee identified 252 unaccompanied children in pre-removal centres, including children detained as "attached" to an adult or wrongly registered as adults. However, another 321 unaccompanied children were safeguarded from detention. Thus, 56% of all unaccompanied children, who arrived in the country, were safeguarded from detention vs. 44% who unduly suffered it (2024: 31% detained vs. 69% who avoided detention; 2023: 22% detained vs. 78% who avoided detention; 2022: 24% detained vs. 76% who avoided detention; 2021: 28% detained vs. 72% who avoided detention; 2020: 37% detained vs. 63% who avoided detention).<sup>701</sup>

---

<sup>693</sup> OHCHR, Bulgaria torture prevention: UN experts concerned about migrant children in detention, published on 5 November 2021, available at: <https://bit.ly/423qKUI>.

<sup>694</sup> Council of Ministers, Decision No 129 of 5 July 2018, available in Bulgarian at: <https://bit.ly/2DpJHHK>.

<sup>695</sup> MOI statistics, December 2024, available in Bulgarian at: <https://bit.ly/48C57wC>.

<sup>696</sup> UN Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Comments of Bulgaria on the recommendations and observations addressed to it in connection with the Subcommittee visit undertaken from 24 to 30 October 2021, published on 25 October 2022, available at: <https://bit.ly/3uMsZ2T>, § 99.

<sup>697</sup> Article 28a LARB, St.G. №34/2019, enforced on 24 October 2019.

<sup>698</sup> Article 63k and 63l Regulations for Implementation of the Law on Aliens in the Republic of Bulgaria (LARB Regulations), St.G. №23/2019, enforced on 26 November 2019.

<sup>699</sup> LAR amendments, State Gazette No.89 from 16 October 2020, available in Bulgarian at: <https://bit.ly/2M5pyh6>.

<sup>700</sup> State Agency for Refugees and State Agency for Child Protection, Age Assessment Instruction, published on 1 December 2023, enforced on 1 March 2024, available in Bulgarian at: <https://bit.ly/4ctn0AN>.

<sup>701</sup> Bulgarian Helsinki Committee, December 2025 UNICEF report, 10 January 2026.

Unlawful detention of unaccompanied children: 2020-2025						
	2020	2021	2022	2023	2024	2025
Unaccompanied children subjected to detention	37%	28%	24%	22%	809	252
Unaccompanied children who avoided detention	63%	72%	76%	78%	1,792	321

#### 4. Duration of detention

##### Indicators: Duration of Detention

- What is the maximum detention period set in the law (incl. extensions):
  - ❖ Short-term detention 30 days
  - ❖ Pre-removal detention 18 months
  - ❖ Asylum detention Indefinite<sup>702</sup>
- In practice, how long in average are asylum seekers detained?
  - ❖ Short-term detention 6 days<sup>703</sup>
  - ❖ Asylum detention 89 days<sup>704</sup>

#### 4.1 Duration of pre-removal detention and short-term detention

The maximum immigration detention period is 18 months, including extensions. Initial detention order is in principle issued for a period of 6 months. Following an amendment to the LARB in 2017, extensions can be ordered by the Immigration Police instead of the court after the expiry of the initial or consecutive detention order.<sup>705</sup> Each consecutive extension is also issued for a minimum of 6 months until the 18-month limit is reached.

Short-term detention can be ordered for a maximum of 30 days.<sup>706</sup> Short-term detention orders were frequently issued by the police until the summer of 2022 when, in attempt to give proof to EU institutions of the readiness of Bulgaria to join the Schengen zone, the caretaker cabinet's MOI management instructed on direct application of long-term detention orders - with initial period of 6 months - without any prior consideration of personal circumstances or submitted asylum claim.

The LAR safeguards the registration of asylum applications and the release of the asylum applicants from pre-removal detention centres within 6 working days, in line with the recast Asylum Procedures Directive.<sup>707</sup> In 2018, the Supreme Administrative Court acknowledged the illegality of pre-removal detention after the submission of an asylum application.<sup>708</sup> The average duration of detention was of 7 calendar days in 2021, and 6 calendar days in 2022 and 7 calendar days in 2023 on average. In 2025 the average detention duration maintained minimal to 3 calendar days.

Average period of pre-removal detention pending registration (days)										
Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
Average detention period	9	19	9	12	8	7	6	7	6	3

Source: SAR, MOI, Bulgarian Helsinki Committee.

<sup>702</sup> Article 45d(1) LAR.

<sup>703</sup> Bulgarian Helsinki Committee, 2025 Annual RSD Monitoring report, 31 January 2026, available in Bulgarian at: <https://bit.ly/3SX3ST7>.

<sup>704</sup> SAR, reg. №ΠΟ-02-115 from 22 February 2026.

<sup>705</sup> Article 46a(3) and (4) LARB, repealed by Law amending the LARB, State Gazette No 97, 5 December 2017.

<sup>706</sup> Article 44(13) LARB.

<sup>707</sup> Article 58(4) LAR.

<sup>708</sup> Supreme Administrative Court, Decision No 77, 4 January 2018, available in Bulgarian at: <http://bit.ly/2rTKmO4>. The Court refers to CJEU, Case C-537/11 M.A.

Out of the 2,860 persons applying for asylum from pre-removal detention, no asylum seeker (0%) was detained for more than 6 months.

The average duration of detention of wrongly detained unaccompanied children increased to 13 days in 2025 (12 days in 2024).<sup>709</sup>

## 4.2 Duration of asylum detention

Detention during the status determination procedure in closed reception facilities is limited by the law to the shortest period possible.<sup>710</sup> However, in practice the SAR kept asylum seekers in closed centres until the decision on their asylum applications became final, which for some of the detained asylum seekers extended to 6-7 months. The regular review of necessity as per the law is so far applied formally,<sup>711</sup> resulting in detained asylum seekers being released only following the engagement of legal assistance and representation.<sup>712</sup> In its reply<sup>1</sup> to the findings of this report the SAR stated that in 2025, as a result of implemented regular reviews 24 decisions for termination asylum detention were issued due to the fact that the legal grounds for the accommodation were ceased or no longer applicable. The average duration of detention for asylum seekers in 2025 increased again to 89 days on average, in comparison to 86 days in 2024. It remains far from the legal standard set in the law, according to which detention should last for the “shortest period possible”, but it should be noted that it still constitutes an improvement compared to some of the previous years (86 days in 2024; 64 days in 2023; 56 days in 2022; 50 days in 2021; 252 days in 2019; 192 days in 2018).

## C. Detention conditions

### 1. Place of detention

#### Indicators: Place of Detention

1. Does the law allow for asylum seekers to be detained in prisons for the purpose of the asylum procedure (i.e. not as a result of criminal charges)?  Yes  No
2. If so, are asylum seekers ever detained in practice in prisons for the purpose of the asylum procedure?  Yes  No

Asylum seekers are never detained in prisons unless they have been convicted for committing a crime. Detention is implemented both in pre-removal immigration detention centres and, more recently, in “closed reception centres” where asylum seekers are detained for the purpose of the status determination procedure.

### 1.1 Pre-removal detention centres

There are 2 detention centres for irregular migrants in the country, with a total capacity of 1,060 places. Due to the increased number of the new arrivals from 25 August to 19 November 2021, the Ministry of Interior reopened as auxiliary the former Elhovo Triage centre with a capacity 240 places, therefore in that time period, the detention capacity had increased to 1,300 places.

<sup>709</sup> Bulgarian Helsinki Committee, December 2025 UNICEF report.

<sup>710</sup> Article 45e LAR.

<sup>711</sup> Article 45d (2) LAR.

<sup>712</sup> Bulgarian Helsinki Committee, Monthly Situation Report: December 2017, 10 January 2018.

Pre-removal detention centres in Bulgaria			
Detention centre	Location	Capacity	Occupancy end 2025
Busmantsi	Sofia	400	89
Lyubimets	South-Eastern Bulgaria	660 <sup>713</sup>	115
<b>Total</b>		<b>1,060</b>	<b>204</b>

Source: MOI.

Although designed for the return of irregular migrants as pre-removal centres, these are also used for the detention of undocumented asylum seekers who have crossed the border irregularly but were unable to apply for asylum before the Border Police officers and therefore apply for asylum only when they are already in the detention centres. The most common reason for these late asylum applications was the lack of 24-hour interpretation services for all languages at national borders.

Initially designated for the pre-registration of asylum seekers,<sup>714</sup> **Elhovo** was thereupon used as an “allocation centre” or “triage centre” to detain asylum seekers apprehended at the land borders outside the official border checkpoint until its closure in February 2017. In 2021, due to the increased number of new arrivals the Ministry of Interior reopened as auxiliary the former Elhovo Triage centre with capacity of 240 places from 25 August to 19 November 2021, after which the centre was closed again. In May 2022, the MOI finished working on the creation of a new detention facility in the town of Elhovo, which consists of 221 container compartments fit for 1,768 individuals. In 2022, the regular government first tried to use it as a transit centre for Ukrainian refugees.<sup>715</sup> The project was abandoned following widespread protests from the general public and non-governmental organisations. On 16 November 2022, the caretaker government<sup>716</sup> officially designated Elhovo detention centre to serve as a transit centre for re-distribution of newly arrived Ukrainian refugees despite its utterly unsuitable conditions, including due to its remote location, and the repeated protests.<sup>717</sup>

Regarding short-term detention, which entered into force on 6 June 2018, the LARB foresees separate detention facilities for the purpose of this form of detention.<sup>718</sup> However, since 2021 no short-term detention orders were issued or implemented.

## 1.2 Asylum detention centres (“closed reception centres”)

The law foresees the asylum detention under the responsibility of the SAR (see [Grounds for Detention](#)). The only operational centre at the moment is **the closed reception ward (ПЗТ)** in Busmantsi detention centre, with 16 places.

The SAR **Pastrogor** transit centre, situated on the Bulgarian-Turkish border can also be used as a closed facility, if necessary. Since the beginning of its operation in May 2012,<sup>719</sup> it has been operating as an open facility. However, on 19 December 2025 SAR handed back to Migration Directorate-MOI the closed reception ward in Busmantsi detention centre and transferred asylum seekers detained pending their procedure for international protection to Pastrogor transit centre, thus designating it to serve as a **closed reception center (ЦЗТ)** with a capacity of 300 places.

<sup>713</sup> 360 containers installed in Lyubimets detention centre.

<sup>714</sup> EASO, Stock taking report on the asylum situation in Bulgaria, March 2014, 3.2. Asylum Determination Procedure.

<sup>715</sup> dnes.bg, Временният център в Елхово е готов за бежанците, ето как изглежда, published on 31 May 2022, available in Bulgarian at: <https://bit.ly/3l0ck73>.

<sup>716</sup> COM No. 980 from 16 November 2022.

<sup>717</sup> Bulgarian Helsinki Committee, Кой настанява украинските бежанци в лагера за задържане на мигранти в Елхово?, published on 4 November 2022, available in Bulgarian at: <https://bit.ly/3YACdYW>.

<sup>718</sup> Article 44(13) LARB.

<sup>719</sup> Citybuild.bg, Откриха транзитен център за бежанци в с. Пъстрогор, published on 3 May 2021, available [here](#) in Bulgarian.

## 2. Conditions in detention facilities

### Indicators: Conditions in Detention Facilities

1. Do detainees have access to health care in practice?  Yes  No  
❖ If yes, is it limited to emergency health care?  Yes  No

### 2.1 Overall living conditions

In previous years, the detention centres were frequently overcrowded due to the increased number of new arrivals. The overall number of persons in detention gradually decrease from 119 persons at the end of 2019, to 387 out of 18,554 detainees at the end of 2023, to 204 out of 3,417 detainees at the end of 2025 in total placed in both national detention centres throughout the year.<sup>720</sup>

Overall conditions with respect to means to maintain personal hygiene as well as general level of cleanliness remain unsatisfactory. In 2017, it was reported that the number of showers and toilets available was not sufficient to meet the needs of the detained population, especially when premises are overcrowded.<sup>721</sup> Detainees are allowed to clean the premises themselves. However, they are not provided with means or detergents, which they have to buy at their own expenses. Clothing is provided only if supplied by NGOs. Bed linen is not washed on a regular basis, but usually once a month. In 2021, the report of the UN Subcommittee on Prevention of Torture established<sup>722</sup> ongoing efforts to improve conditions in the detention centers, including trough activities funded under the emergency AMIF assistance mechanism. The report found that the bed bug problem was limited to a tolerable level, all existing problems related to the heating systems solved and a so-called “preliminary filter” applied with respect to every new detainee, including the opportunity to take a shower, provision of clean and disinfected clothes, with personal clothes washed at high temperature and a possibility to freeze the personal luggage of the newcomers for 24 hours for the purpose of sanitizing.

However, in 2022 the Ombudsperson<sup>723</sup> reported that: “In the course of the inspection, it was established that from 2020 health inspectors have not visited the centres to check and control the sanitary conditions despite a previous Ombudsperson’s recommendations. Presently, detainees with chronic skin problems, such as scabies and pyoderma were established once again, along bed bug bites, and travel injuries with secondary infections.” In addition, the report noted the “unsuccessful struggle of the detention administrations” with pests, such as woodworms, cockroaches and fleas. Also in 2022, the Ombudsperson<sup>724</sup> reported that many of the detainees in Busmantsi detention centres expressed complaints regarding the food, and others that they are asked to pay for the medicines they need with their own funds. In its 2024 report<sup>725</sup>, the Council of Europe's Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (ECPT) found material conditions to be extremely poor, with virtually all detainee accommodation areas being overcrowded, dilapidated, dirty and infested with bedbugs, and with premises very prison-like and particularly poorly adapted for the accommodation of

<sup>720</sup> MOI statistics, December 2024, available in Bulgarian at: <https://bit.ly/48C57wC>.

<sup>721</sup> CERD, Concluding observations on the combined twentieth to twenty-second periodic reports to Bulgaria, CERD/C/BGR/CO/20-22, 31 May 2017, available at: <http://bit.ly/2wSzlpq>, para 21(e); Centre for Legal Aid – Voice in Bulgaria, Who Gets Detained, September 2016, 25.

<sup>722</sup> UN Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Comments of Bulgaria on the recommendations and observations addressed to it in connection with the Subcommittee visit undertaken from 24 to 30 October 2021, published on 25 October 2022, available at: <https://bit.ly/3uMsZ2T>.

<sup>723</sup> Ombudsperson of the Republic of Bulgaria, Доклад на Националния превантивен механизъм за извършени проверки в структури на Дирекция „Миграция“ към Министерство на вътрешните работи и Държавна агенция за бежанците към Министерски съвет, published in September 2022, available at: <https://bit.ly/3leBgzJ>.

<sup>724</sup> Ombudsperson of the Republic of Bulgaria, Доклад на Националния превантивен механизъм за извършени проверки в структури на Дирекция „Миграция“ към Министерство на вътрешните работи и Държавна агенция за бежанците към Министерски съвет, published in September 2022, available at: <https://bit.ly/3leBgzJ>.

<sup>725</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16 - 23 September 2024, published on 6 August 2025, paragraph 38, available [here](#).

women, families and minors. Furthermore, the report also indicated persistent serious problems with the provision of appropriate clothing, including shoes for minors, personal hygiene items and especially towels and cleaning products.

In 2024 report<sup>726</sup> with regard to health-care services at both detention centres in Busmantsi and Lyubimets, ECPT found the only positive aspects to have been the 24/7 health-care staff coverage and an improved in comparison with 2018, access to outside consultations, including dental care and hospitalisations. However, the report found all other aspects of health-care provision unsatisfactory with medical screening on arrival perfunctory at best, and frequently factually inaccurate, with virtually all screening forms containing absolutely identical data on pulse, blood pressure and temperature. Medical records were also found to be extremely poor with confidentiality not respected as medical data had been made available to non-medical staff. Equipment of health-care units was also assessed as very basic, no oxygen available, broken ultrasound machines, ECG and defibrillators kept uncharged, with overall meagre medication stocks. Like in 2018, ECPT found that detained migrants had a very poor access to psychiatric care, limited to emergencies. Although both detention centers employed a psychologist, their task was to assist the case officers and administration with psychological testing and risk assessments, thus primarily supporting the detention staff, and offering some psychological support including crisis interventions to detained migrants, only if there was any spare time. In addition, the lack of interpretation between detained migrants and doctors, feldshers, nurses and psychologists limited severely the possibilities to provide any proper medical or psychological assistance.

Nutrition is poor, no special diets are provided to children or pregnant women. Health care is a major issue as not all detention centres have medical staff appointed on a daily basis. A nurse and/or a doctor visits detention centres on a weekly basis, but the language barrier and lack of proper medication make these visits almost a formality and without any practical use for the detainees. The UN Subcommittee on Prevention of Torture 2021 report established<sup>727</sup> that: “Varied food is delivered daily on site, in compliance with the requirements of a healthy diet, including meat and dairy products with a reduced content of fat and salt. Fresh fruits and vegetables are delivered daily. The food is packaged in portions in single-use boxes, with the corresponding.” In 2022 the Ombudsperson<sup>728</sup> reported that cutlery is placed in isothermal containers, ensuring the preservation of the original temperature and that if there is a medical prescription, diet food is provided.”<sup>729</sup>

Similar to **Busmantsi**, communal toilets in **Lyubimets** were reported to be locked and inaccessible at night. Toilets and showers for women and families with children, though freely accessible, have been found to be dilapidated, dirty and flooded. The collective showers for men, recently refurbished and located in the basement, were accessible in groups twice a day. In its 2024 report<sup>730</sup>, ECPT found that, unlike in 2018, detainees at the Lyubimets detention center had access to the toilet at night; however, such access was still extremely limited or even inexistent in Busmantsi, which is totally unacceptable. At Busmantsi, ECPT also noted that female detainees were obliged to share the same communal toilets and showers with the men, while toilet doors could not be locked, and shower cabins had no doors.

Access to open-air spaces is provided twice a day for a period of one hour each, the spaces in all detention centres are of adequate size. Children in detention centres are using the common outdoor recreational facilities, but not many possibilities for physical exercise exist except the usual ball sports. Reading and

---

<sup>726</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16 - 23 September 2024, published on 6 August 2025, paragraph 38, available [here](#).

<sup>727</sup> UN Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Comments of Bulgaria on the recommendations and observations addressed to it in connection with the Subcommittee visit undertaken from 24 to 30 October 2021, published on 25 October 2022, available at: <https://bit.ly/3uMsZ2T>.

<sup>728</sup> Ombudsperson of the Republic of Bulgaria, Доклад на Националния превантивен механизъм за извършени проверки в структури на Дирекция „Миграция“ към Министерство на вътрешните работи и Държавна агенция за бежанците към Министерски съвет, published in September 2022, available at: <https://bit.ly/3leBgzJ>.

<sup>729</sup> Ibid, § 100-102.

<sup>730</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16 - 23 September 2024, published on 6 August 2025, paragraph 38, available [here](#).

leisure materials are provided only if supplied by donations. Computer / internet access is not available in any of the detention centres.<sup>731</sup> In its 2024 report<sup>732</sup>, ECPT found that similar to its previous 2018 report, detained migrants had nothing or almost nothing to occupy their time. There were no organised activities, apart from very limited access to table tennis, occasional access to a gym, television unless the TV sets were broken and some books in Lyubimets detention centre; however, none of these was available in Busmantsi detention centre. ECPT found this of particular concern with respect to the minors, for whom there were hardly any toys and no educational activities. In Busmantsi detention centre, unlike in Lyubimets, detained migrants had no guaranteed access to daily outdoor exercise; such only provided for 25 to 30 minutes at a time, with asylum seekers detained at SAR closed ward with no outdoor exercise on weekends and public holidays, due to the shortage of available SAR staff. ECPT indicated that latter as “a truly deplorable state of affairs.”

Staff interpreters are not required by law, nor provided in practice. In 2021, as in previous years, detainees have complained about the lack of tailored and translated information and uncertainty on their situation.<sup>733</sup> This has led to risks of re-traumatisation for persons with vulnerabilities.<sup>734</sup> In 2022, the Ombudsperson<sup>735</sup> reported that no staff translators were assigned in both national detention centres, but some of the employees working there were enrolled in language courses in order to have better communication with the residents, and if necessary the services of contracted translators were used. Similar findings were stated in UN CAT Subcommittee report from its 2021 visit.<sup>736</sup> In its 2024 report<sup>737</sup>, ECPT found that at both detention centres, as well as the SAR closed ward in Busmantsi, access to interpretation had remained inadequate and as a rule, limited to interpretation during interviews by immigration case workers. No interpretation is available in daily life situations including medical and psychological consultations, which had an obvious negative impact on the quality of care.

Verbal abuse and rude behaviour by staff is reported often by the detainees; such indicated as well in ECPT 2024 report<sup>738</sup>. Inter-detainee violence is also acknowledged to occur sometimes with measures taken to prevent the reoccurrence of such conflicts, but mainly by separating adult men from Afghanistan and those from Arabic speaking countries.<sup>739</sup>

## 2.2 Vulnerable groups in detention

There are no mechanisms established to identify vulnerable persons in detention centres. Although the law<sup>740</sup> provides that authorities should conduct an assessment whether an individual belongs to a vulnerable group before issuing detention orders, such as detention, such assessment is not carried out

<sup>731</sup> Bulgarian Helsinki Committee, based on organization’s regular observations from its weekly detention monitoring, implemented in Busmantsi detention centre since 2006 and since 2011 in Lyubimets detention centre.

<sup>732</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16 - 23 September 2024, published on 6 August 2025, paragraph 38, available [here](#).

<sup>733</sup> CPT, 2019 Bulgaria report, July 2019, available at: <https://rm.coe.int/1680966286>; Centre for Legal Aid – Voice in Bulgaria, Who Gets Detained?, September 2016, 25.

<sup>734</sup> CPT, 2019 Bulgaria report, July 2019, available at: <https://rm.coe.int/1680966286>; Cordelia Foundation et al., From Torture to Detention, January 2016, 19.

<sup>735</sup> Ombudsperson of the Republic of Bulgaria, Доклад на Националния превантивен механизъм за извършени проверки в структури на Дирекция „Миграция“ към Министерство на вътрешните работи и Държавна агенция за бежанците към Министерски съвет, published in September 2022, available at: <https://bit.ly/3leBgzJ>.

<sup>736</sup> UN Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Comments of Bulgaria on the recommendations and observations addressed to it in connection with the Subcommittee visit undertaken from 24 to 30 October 2021, published on 25 October 2022, available at: <https://bit.ly/3uMsZ2T>, § 107.

<sup>737</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16 - 23 September 2024, published on 6 August 2025, paragraph 38, available [here](#).

<sup>738</sup> UN Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Comments of Bulgaria on the recommendations and observations addressed to it in connection with the Subcommittee visit undertaken from 24 to 30 October 2021, published on 25 October 2022, available at: <https://bit.ly/3uMsZ2T>.

<sup>739</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16 - 23 September 2024, published on 6 August 2025, paragraph 38, available [here](#).

<sup>740</sup> Article 44(2) LARB.

in practice.<sup>741</sup> The lack of mechanisms for identification and support of vulnerable asylum seekers was also indicated by the European Commission a letter of formal notice from 8 November 2018.<sup>742</sup> According to the last research on the topic made by the Assistance Centre for Torture Survivors (ACET), mental health professionals in Busmantsi have observed that persons who are socially inhibited or depressed are not being identified by the police as persons in need of assistance as far as they do not cause problems.<sup>743</sup> If identified, there are no provisions in the law for vulnerable persons' release on that account, unless before the court.

Article 45e(3) LAR envisages that vulnerable groups shall be provided with appropriate assistance depending on their special situation. Separate wings are provided for families, single women and unaccompanied children, in line with the law.<sup>744</sup> Single men are separated from single women. Other vulnerable persons are detained together with all other detainees. The LAR provides for access to education and leisure activities for children in closed asylum facilities,<sup>745</sup> but there is no relevant practice yet, as accompanied children have not been placed in closed reception centres in 2025.

### 3. Access to detention facilities

#### Indicators: Access to Detention Facilities

1. Is access to detention centres allowed to

- |                   |   |                                  |                             |
|-------------------|---|----------------------------------|-----------------------------|
| ❖ Lawyers:        | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited | <input type="checkbox"/> No |
| ❖ NGOs:           | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited | <input type="checkbox"/> No |
| ❖ UNHCR:          | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited | <input type="checkbox"/> No |
| ❖ Family members: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> Limited | <input type="checkbox"/> No |

Lawyers as well as representatives of NGOs and UNHCR have access under the law and in practice to the detention centres during visiting hours but also *ad hoc* without prior permission when necessary or requested by asylum seekers.<sup>746</sup> Some NGOs have signed official agreements with the Migration Directorate and do visit detention centres for monitoring and assistance once a week.<sup>747</sup> In practice, the Bulgarian Helsinki Committee is the only NGO visiting both detention centres regularly on a weekly basis, without exclusions. Other NGOs carry out ad hoc visits to the Busmantsi detention centre, but none except BHC visits regularly the centre in Lyubimets. Media and politicians also have access to detention centres, which is authorised upon written request.

NGOs' and legal aid providers' right to access to asylum seekers is explicitly regulated and expanded to also include border-crossing points and transit zones.<sup>748</sup> However, the Bulgarian Helsinki Committee was the only NGO in 2020 and 2021 visiting border and detention centres regularly as well as the SAR closed facility as all the rest refrained from visitations due to COVID-19. In 2023, other NGOs such as Centre for Legal Aid and FAR restarted realising visits to the Busmantsi detention centre near Sofia,<sup>749</sup> and continued to carry out some visits throughout 2025.

<sup>741</sup> Migrant Life, Позиция на Център за правна помощ – Глас в България и Фондация за достъп до права ФАР относно смъртен случай в СДВНЧ – София, в. „Бусманци“, published on 31 June 2021, available in Bulgarian at: <https://bit.ly/42WknTS>.

<sup>742</sup> European Commission, 'November infringements package: key decisions', MEMO/18/6247, 8 November 2018, available at: <https://bit.ly/2RETZfR>.

<sup>743</sup> Cordelia Foundation et al., *From Torture to Detention*, January 2016, 18.

<sup>744</sup> Article 45f(4) LAR.

<sup>745</sup> Article 45f(2) LAR.

<sup>746</sup> This has been a systematic concern. See JRS Europe, *Becoming Vulnerable in Detention (Detention of Vulnerable Asylum Seekers - DEVAS Project)*, 2010, National Chapter on Bulgaria, 147 - points. 3.1 and 3.2.

<sup>747</sup> Bulgarian Helsinki Committee, Bulgarian Red Cross, Nadya Centre, Centre for Legal Aid-Voice in Bulgaria, Foundation for Access to Rights, etc.

<sup>748</sup> Article 23(3) LAR.

<sup>749</sup> Center for Legal Aid-Voice in Bulgaria, available at: <https://bit.ly/3ntNoW9>; Foundation for Access to Rights, available at: <https://www.farbg.eu/>.

## D. Procedural safeguards

### 1. Judicial review of the detention order

#### Indicators: Judicial Review of Detention

1. Is there an automatic review of the lawfulness of detention?  Yes  No
2. If yes, at what interval is the detention order reviewed? 6 months

Detained asylum seekers are treated in the same manner as the rest of the detained population; hence they are informed orally by the detention staff of the reasons of their detention and the possibility to challenge it in court, but not about the possibility and the methods of applying for legal aid. However, asylum seekers are generally not informed in a language they understand as none of the existing detention centres has interpreters among its staff. A copy of the detention order is usually provided to the individual.

Detention is also not subject to a prompt judicial review of the initial decision to detain and to a regular review thereafter. The law no longer provides for automatic judicial review of detention orders, following the abolition of judicial review upon prolongation of detention.<sup>750</sup> This reform took place against the backdrop of the impossibility to access legal aid for detainees wishing to challenge detention orders.

As a result, judicial review may only be triggered at the initiative of the applicant. Detention orders can be appealed within 14 calendar days of the actual detention before the Administrative Court in the area of the headquarters of the authority which has issued the contested administrative act.<sup>751</sup> The appeal does not suspend the execution of the detention order.<sup>752</sup> The submission of the appeal is additionally hindered by the fact that the detention orders are not interpreted. The short deadline for lodging an appeal has proved to be highly disproportionate and usually not complied with by detained individuals, including asylum seekers.<sup>753</sup>

### 2. Legal assistance for review of detention

#### Indicators: Legal Assistance for Review of Detention

1. Does the law provide for access to free legal assistance for the review of detention?  Yes  No
2. Do asylum seekers have effective access to free legal assistance in practice?  Yes  No

Detained applicants have the right to legal aid.<sup>754</sup> However, legal aid has not been provided by the state to detainees, including asylum seekers in detention centres - since the end of 2019, due to National Legal Aid Bureau's budget constraints, despite a pilot project financed by AMIF which provided legal aid to vulnerable asylum seekers for the first time in Bulgaria (see [Regular Procedure: Legal Assistance](#)).

In its 2024 report<sup>755</sup>, ECPT found that migrants, held in Lyubimets are generally provided with some written and oral information on their legal situation including copies of detention decisions and their rights and avenues of complaint; however, this is not the case in Busmantsi where most of the interviewed foreign nationals appeared to be unaware of their legal situation and rights. The report pointed out that detained migrants' access to free legal aid is provided exclusively by NGOs, especially the Bulgarian Helsinki Committee.

<sup>750</sup> Article 46a(3)-(4) LARB, repealed by Law amending the LARB, State Gazette No 97, 5 December 2017.

<sup>751</sup> Article 46 LARB.

<sup>752</sup> Article 46a LARB.

<sup>753</sup> Bulgarian Helsinki Committee, Detention Mapping report Bulgaria, October 2016, para 23.

<sup>754</sup> Article 22(9) Law on Legal Aid.

<sup>755</sup> European Committee for Prevention of Torture, Inhuman and Degrading Treatment or Punishment, Ad Hoc Visit Report, Bulgaria 16 - 23 September 2024, published on 6 August 2025, paragraph 38, available [here](#).

Whilst legal aid is provided for appeals under the state budget, access to the courts to lodge such an appeal turns heavily on the provision of legal assistance by NGO providers in the absence of legal aid outside court procedures. Consequently, effective access to legal assistance during the procedure for these applicants is completely negated. In this context, in its 2018 report the ECPT recommended that the system of legal aid run by the National Legal Aid Bureau should be extended to detained migrants in all phases of the detention procedure; whereas for destitute foreign nationals these services should be provided free of charge.<sup>756</sup> However, as of the end of 2025, no actions in this respect had been undertaken by the NLAB, mainly due to overall restrictions related to state budgeted legal aid.

There is also a lack of state-funded legal assistance for children detained in closed facilities to challenge the detention order, despite the general child protection legislation which envisaging the right of all children to such an assistance.<sup>757</sup> As the LARB does not envisage the appointment of guardians to unaccompanied or separated children - and since according to Bulgarian law children can only undertake legal actions through or with the consent of their guardians - they cannot challenge their detention order unless provided tailored legal support to submit an appeal without it.

### **E. Differential treatment of specific nationalities in detention**

In 2025, no cases of discrimination against specific nationalities were reported concerning detention. In the past, when this malpractice was more widely applied, asylum seekers who had their registrations in the pre-removal facilities ranged from all nationalities without exclusion. The reasons provided previously by the national asylum agency SAR to implement registrations in pre-removal centres was the inability to fulfil otherwise the obligation to meet the short 6-working days deadline under the national and community law,<sup>758</sup> if the release from detention and the transfer of detained applicants to open asylum centres was delayed by the immigration police or national security services. In 2024, as in 2023 and 2022, the SAR completely abandoned this malpractice,<sup>759</sup> with no determinations conducted in a police pre-removal detention centre, however in 2025 it was resumed, albeit in just 1 case<sup>760</sup>.

---

<sup>756</sup> CPT, 2019 Bulgaria report, July 2019, para 41.

<sup>757</sup> Article 15(8) Law on Child Protection.

<sup>758</sup> Article 58(4) LAR, Article 6(1) APD.

<sup>759</sup> Bulgarian Helsinki Committee, 2023 Annual Refugee Status Determination Monitoring Report, 31 January 2024, available at: <https://bit.ly/3SX3ST7>.

<sup>760</sup> Bulgarian Helsinki Committee, 2025 Annual Refugee Status Determination Monitoring Report, 31 January 2026, available at: <https://bit.ly/3SX3ST7>.

## Content of International Protection

Recognised **refugees** are explicitly entitled to equal treatment in rights to Bulgarian nationals with just a few exclusions, such as: participation in general and municipal elections, in national and regional referenda; participation in the establishment of political parties and membership of such parties; holding positions for which Bulgarian citizenship is required by law; serving in the army and, other restrictions explicitly provided for by law.<sup>761</sup> Individuals granted **subsidiary protection** (“humanitarian status”) have the same rights as third-country nationals with permanent residence.<sup>762</sup>

### 2025 as the twelfth “zero integration year”

Since 2013 and up to 2025, Bulgaria followed a “zero integration policy”. The first National Programme for the Integration of Refugees (NPIR) was adopted and applied until the end of 2013, but since then all beneficiaries of international protection have been left without any integration support. This resulted in extremely limited access or ability by these individuals to enjoy even the most basic social, labour and health rights, while their willingness to permanently settle in Bulgaria was reported to have decreased to a minimum.<sup>763</sup> In 2025, 34% of asylum applicants abandoned their status determination procedures - which were subsequently terminated - in Bulgaria.<sup>764</sup> In comparison, this percentage was 47% in 2024; 46% in 2023, 45% in 2022 and 26% in 2021.

The necessary integration legal framework, the Integration Decree, was finally adopted in 2016,<sup>765</sup> but it remained unused throughout 2016 and 2017, as none of the 265 local municipalities had applied for funding to launch an integration process with any of the individuals granted international protection in Bulgaria. On 31 March 2017, on the last day of its mandate, the caretaker Cabinet fulfilled the election promise of the newly elected Bulgarian President and repealed the Decree without any reasonable justification.<sup>766</sup> A new Decree was adopted on 19 July 2017, which in its essence repeated the provisions of its predecessor.<sup>767</sup> Since its adoption, only 133 status holders benefitted from integration support,<sup>768</sup> however all of them were **relocated with integration funding provided under the EU relocation scheme**, not by the general national integration mechanism. Following relentless advocacy efforts by UNHCR, the Refugee Council and the Red Cross with the support of the SAR, in 2021 and 2022 the **Vitosha** and **Oborishte** Districts (Sofia municipality) provided this integration support. The support itself consisted of rent expenses covered by the municipalities and the fee for the Bulgarian language courses, covered by the Red Cross. In 2023, just 22 individuals benefitted from these integration agreements, while in 2024 this number was even lower, with just 8 individuals from two families benefitting from the agreements with no integration contracts reported in 2025.<sup>769</sup> In 2021, the Oborishte District received funding from the Norwegian financial mechanism to refurbish municipal flats intended as transitional accommodation of unaccompanied children granted protection,<sup>770</sup> and who are generally the most difficult age group to find accommodation in the regular child care facilities. No other integration measures or activities were planned, funded or available to individuals granted international protection – refugee or

<sup>761</sup> Article 32(1) LAR.

<sup>762</sup> Article 32(2) LAR.

<sup>763</sup> CERD, Concluding observations on the combined twentieth to twenty-second periodic reports to Bulgaria, CERD/C/BGR/CO/20-22, 31 May 2017, available at: <http://bit.ly/2wSzlPq>, para 21(f); Bulgarian Council on Refugees and Migrants, Annual Monitoring Report on Integration of Beneficiaries of international protection in Bulgaria, Sofia, December 2014.

<sup>764</sup> SAR, reg. №ΠΟ-02-115 from 22 February 2026: 2,428 persons out of 9,946 asylum seekers with pending cases abandoned their asylum procedure in Bulgaria.

<sup>765</sup> Ordinance No 208 of 12 August 2016 on rules and conditions to conclude, implement and cease integration agreements with foreigners granted asylum or international protection (hereafter “Integration Decree”), State Gazette No 65/19.08.2016, available in Bulgarian at: <http://bit.ly/2jJwnEi>.

<sup>766</sup> Liberties.eu, ‘Bulgarian caretaker government repealed regulation on refugee integration’, 13 April 2017, available at: <http://bit.ly/2BLqhsS>.

<sup>767</sup> Ordinance No 144 of 19 July 2017 State Gazette No 60/25.08.2017, available in Bulgarian at: <http://bit.ly/2Ec2uHL>.

<sup>768</sup> SAR statistics, 2021: 83 beneficiaries, 2022: 20 beneficiaries, 2023: 22 beneficiaries and 2024: 8 beneficiaries.

<sup>769</sup> Statistics provided by the Bulgarian Council for Refugees and Migrants on 9 January 2026.

<sup>770</sup> Teleconference on 14 January 2022 with Nadezhda Bobcheva, Deputy Mayor, Oborishte District, Sofia Municipality.

humanitarian status. The program for the integration of displaced persons from Ukraine under temporary protection drafted by the regular government was not adopted as this government was ousted by a vote of no confidence on 22 June 2022. On 2 May 2025 the government finally adopted<sup>771</sup> a Program for Humanitarian Assistance and Integration of displaced persons from Ukraine under temporary protection in Bulgaria. However, the so-called integration measures consist of enlisting different agencies and institutions and their competencies with respect to ensure access to certain integration related rights, rather than real and concrete measures of material assistance, employment or other support for integration.

In his report issued in April 2018, the Council of Europe Special Representative on migration and refugees also underlined that, while the decentralisation of integration responsibilities from the government to municipalities would in principle be a sensible step forward, the fact that the discharge of such responsibilities was not mandatory but left to the discretion of municipalities raised questions about the effectiveness of integration measures in Bulgaria. This was illustrated by fact that no municipality has volunteered to conclude Integration Agreements, although funds would be allocated to them for every refugee participating in such agreements.<sup>772</sup>

Courts and human rights monitoring bodies have taken into account the treatment of beneficiaries of international protection in Bulgaria when assessing the legality of readmissions.

National courts in some European countries have also halted transfers of beneficiaries of protection to Bulgaria on account of substandard conditions.<sup>773</sup> For example, the German Administrative Court of Köln, for example, found that risks of inhuman and degrading treatment existed for both for asylum seekers and BIPs in the country, through a decision issued on 15 November 2022.<sup>774</sup> In the case of BIPs, the Court concluded that there was a lack of almost any state support to ensure minimum subsistence and fulfilment of basic needs, as well as widespread racism and intolerance, at the very least ignored by the police.

Moreover, the Committee on the Rights of the Child (CRC) issued its decision in the case of *MKAH v Switzerland* on 6 October 2021, which was brought by the Centre Suisse pour la défense des droits des migrants (CDSM) with the intervention from the AIRE Centre, ECRE and the Dutch Council for Refugees.<sup>775</sup> The CRC found that, although the applicants were granted subsidiary protection status in Bulgaria, they had to live for eight months in a camp with inadequate material conditions and no access to education nor the labour market. This forced them to leave Bulgaria and seek the support of relatives. The CRC thus recommended Switzerland to: reconsider the decision to return MKAH to Bulgaria; urgently re-examine the applicant and his mother's asylum application ensuring the best interests of the child are a primary consideration, the applicant is duly heard and taking into account the particular circumstances of the case; take in to account that MKAH may remain stateless in Bulgaria, ensure MKAH receives qualified psychological assistance to facilitate his rehabilitation and to take all necessary measures to ensure violations don't recur.<sup>776</sup>

In 2021 and 2022, civil society organizations, led by Bulgarian Council on Refugees and Migrants and Multi-Kulti Collective, and funded by UNHCR consolidated its expertise to developed a Manifesto on Refugee Integration as a programme document and an advocacy tool covering the key areas of refugee integration. The manifesto proposed setting up a new institutional structure and developing a comprehensive integration process with two stages, namely adaptation and initial integration for asylum

---

<sup>771</sup> COM №278 from 2 May 2025, available in Bulgarian [here](#).

<sup>772</sup> Council of Europe, Report of the fact-finding mission by Ambassador Tomáš Boček, Special Representative of the Secretary General on migration and refugees to Bulgaria, SG/Inf(2018)18, 19 April 2018, available at: <https://bit.ly/2HtHSgv>, 17.

<sup>773</sup> See AIDA Country Report on Bulgaria – 2021 Update.

<sup>774</sup> (Germany) Administrative Court of Köln, 20 K 3733/22.A, 15 November 2022, available at: <https://bit.ly/3zdPDQp>.

<sup>775</sup> UN Committee on the Rights of the Child (CRC), A.M. (au nom de M.K.A.H.) c. Suisse, No 95/2019, 6 October 2021, available at: <https://bit.ly/3rv6iur>.

<sup>776</sup> See also: EDAL summary, CRC: Declares Switzerland did not consider the best interests of the child in a removal decision to Bulgaria, 6 October 2021, available at: <https://bit.ly/3GguTIQ>.

seekers, and a national integration programme for beneficiaries of international protection. However, this document has not been considered by any Bulgarian government so far.<sup>777</sup> The National Strategy on Migration was adopted in Bulgaria for the period 2021-2025, including a chapter on integration, which mentions that policies are implemented with AMIF funding but no specific areas for improvement are listed. The following National Strategy on Migration, Asylum and Integration adopted for the period 2026-2030<sup>778</sup> does neither envisage nor specify any concrete integration measures, rather lists certain rights with respect to reception conditions, e.g. interpretation, access to social assistance, etc. which are envisaged solely in the context of the asylum procedure.

Therefore, Bulgaria marked the twelfth consecutive year of the national “zero integration” policy.

## A. Status and residence

### 1. Residence permit

#### Indicators: Residence Permit

- |  |            |
|--|------------|
| 1. What is the duration of residence permits granted to beneficiaries of protection? |            |
| ❖ Refugee status   | Indefinite |
| ❖ Subsidiary protection  | Indefinite |

Both refugee and subsidiary protection (“humanitarian”) statuses granted are indefinitely and are not limited in duration but differ in the duration of validity of identity documents issued to holders. The duration of validity is 5 years for **refugee status** holders,<sup>779</sup> and 3 years for **subsidiary protection** holders.<sup>780</sup> The different validity of the documents derives from the different scope of rights attributed to each of them. However, in 2020 an amendment to the law introduced a new illegal ground to cease or withdraw international protection (see [Cessation and review of protection status](#)).<sup>781</sup>

The relevant identity documents are issued by the police on the basis of decisions of the SAR to grant either of the international protection statuses. However, difficulties are encountered by beneficiaries in obtaining identity documents in practice, due to the pre-condition of [Civil Registration](#) prior the submission of an application for identity documents; the latter preconditioned by a chosen place of domicile.

During the period 1 January 2014 to 31 December 2025, the Ministry of Interior issued 10,411 refugee identity cards and 24,880 humanitarian identity cards.<sup>782</sup>

### 2. Civil registration

No identity documents can be issued unless the individual is registered in the civil national database (ECFPAOH). Documents issued to asylum seekers<sup>783</sup> and temporary protection holders<sup>784</sup> are not considered to be identity documents<sup>785</sup>. Identification on the basis of a valid document is a pre-condition for exercising almost any personal right envisaged, especially relating to housing, social support or assistance, health insurance and care, access to employment etc.

<sup>777</sup> European Commission, European website on integration, Bulgaria: A decade without national refugee integration support, 20 June 2024, available [here](#).

<sup>778</sup> COM №616 from 3 September 2025, available [here](#) in Bulgarian.

<sup>779</sup> Article 59(1)(2) Law on Bulgarian Identity Documents.

<sup>780</sup> Article 59(1)(3) Law on Bulgarian Identity Documents.

<sup>781</sup> Article 42(5) LAR, enforced on 20 October 2020.

<sup>782</sup> MOI, Identity Documents Department, reg. №УПИ285300-43 from 5 January 2026.

<sup>783</sup> Article 41(1), item 4 LAR.

<sup>784</sup> Article 41(1) item 5 LAR

<sup>785</sup> Article 40 (3) LAR.

The registration in ЕСГРАОН is mandatory to the beneficiaries of international protection.<sup>786</sup> Based on it, they are given a unique identification number (единен граждански номер, ЕГН). Only after registration can beneficiaries apply for the issuance of identity documents.

To be registered in the national database, any individual has to indicate, *inter alia*, a domicile.<sup>787</sup> Following the peak of arrivals and recognitions in 2014-2015 the newly recognised beneficiaries who have lived in reception centres were no longer permitted by the SAR to state the address of the respective reception centre as domicile. Therefore, since the end of 2016 beneficiaries could not provide a valid address or domicile, as they cannot rent a place of residence without a valid identity document. This legal 'catch 22' has led to continuous malpractice, including false renting and address registrations for the sake of enabling beneficiaries to obtain identity documents, as the valid identity document is a pre-condition to exercising their rights. Following extensive advocacy efforts from civil society organisations in October 2024 the law was amended<sup>788</sup> to enable<sup>789</sup> the newly recognised refugees and subsidiary protection holders who cannot state a domicile address when registering for the first time in the population register, or submitting an application for a permanent or current address, to be registered at an officially prescribed service address by the municipality where they have established their habitual residence. This provision entered into force on 8 December 2024 with all municipalities being obliged to assign service address or addresses to be able to commence implementing this new arrangement as of 8 January 2025. In total, 13,130 beneficiaries of international protection or 5,144 refugee status holders and 7,986 subsidiary protection holders were issued identity documents on the basis of assigned service address<sup>790</sup> since the entry into force of the arrangement in the end of 2024 until 31 December 2025.

## 2.1 Child birth registration

The same rules as for nationals apply to the civil registration of birth of a descendent of an asylum seeker or beneficiary of international protection. Residency requirements do not apply with respect to birth registration. The registration of a new-born child is made within 7 days following the day of the delivery.<sup>791</sup>

The registration is made on the basis of a written notification of birth issued by the maternity hospital or clinic where the mother delivered the baby. The father declares the birth at the local municipality administration either in person or by a person authorised by him. In cases when the father is deceased, unknown or unable to appear in person for various other reasons, the statement can be made either by somebody present at the time of birth or by the mother. The required documents for birth registration and issue of the child's birth certificate are proof of identity of both parents and the notification of birth issued by the maternity hospital.

The registration of birth is free of charge.

## 2.2 Marriage registration

Marriages in Bulgaria are subject to a residency requirement.<sup>792</sup> Therefore at least one of the spouses must be either a Bulgarian citizen or a long-term or temporary resident of Bulgaria.

Foreigners need to prove that they do not have another marriage registered in their country of origin. Only beneficiaries of international protection are exempted from this requirement, which is substituted by a civil status certificate issued by the SAR based on prior notarised statement by the beneficiary. This means

---

<sup>786</sup> Articles 100-115 Law on Civil Registration.

<sup>787</sup> Article 90 (1) Law on Civil Registration.

<sup>788</sup> State Gazette No.58 from 8 October 2024.

<sup>789</sup> Article 93 (6), as well as §1 Additional Clauses Law on Civil Registration.

<sup>790</sup> MOI, Identity Documents Directorate, reg. №812104-1103 from 10 February 2026.

<sup>791</sup> Article 42(1) Law on Civil Registration.

<sup>792</sup> Article 76(2) Code on Private International Law.

that marriages cannot be registered by asylum seekers due to the lack of identity documents necessary to make notarised statements.<sup>793</sup>

According to general legislation relating to family arrangements, only civil marriages are legally valid in Bulgaria.<sup>794</sup> The religious ceremony is optional and can be performed only after a civil ceremony has taken place. The religious ceremony itself has no legal effect.

The legal age for getting married in Bulgaria is 18 years. People under that age, but who have already turned 16, may get married with the permission of the Chair of the Regional Court. An application for a permit to marry must be submitted at the Regional Court where the couple resides; if they do not both reside in the same region, they may choose which court to apply to.

### 3. Long-term residence

Long-term residence is not applicable for refugees and subsidiary protection holders at all, as they get their identity cards issued automatically by the police on the basis of the SAR's decision granting status. Therefore, refugees and subsidiary protection holders are not issued additional residence permits at all. Recognised refugees are *ex lege* considered equal in rights with Bulgarian nationals,<sup>795</sup> subject to a few exceptions,<sup>796</sup> whereas individuals granted subsidiary protection enjoy the same rights as the permanent residents.

Refugees and subsidiary protection holders can apply and receive long-term residence in 5 years after their recognition.<sup>797</sup> However, in practice, this opportunity is useful only for subsidiary protection holders to whom the long-term residence card guarantees visa-free travel within the EU.

### 4. Naturalisation

Indicators: Naturalisation	
1. What is the waiting period for obtaining citizenship?	
❖ Refugee status	3 years
❖ Subsidiary protection	5 years
2. Number of citizenship grants to beneficiaries in 2025:	79

**Refugees** may obtain Bulgarian citizenship if they are of over 18 years old and have been recognised for 3 or more years. **Subsidiary protection** (“humanitarian status”) holders obtain Bulgarian citizenship if over 18 and if they have been granted protection for 5 or more years.

Besides this, and regardless of the status or residence, everybody has to have a clear criminal record in Bulgaria, an income or occupation which allows to self-subsistence and to have knowledge of Bulgarian language – speaking, reading and writing in Bulgarian language, proven either by a local school or university diploma or by passing an exam tailored for naturalisation applicants. Applicants are interviewed in Bulgarian language on their motive to obtain citizenship.

The application is examined within 18 months.<sup>798</sup> Citizenship is granted by the president, who issues a decree following a proposal in this respect of the Minister of Justice, the latter based on a positive opinion by the Citizenship Committee at the Ministry of Justice.

<sup>793</sup> Article 40(3) LAR, since the asylum registration card does not certify the identity of the applicant. This follows Article 6(3) recast Reception Conditions Directive.

<sup>794</sup> Article 4 Family Code.

<sup>795</sup> Article 32 LAR.

<sup>796</sup> To vote and be elected in local and/or general elections, to serve in the military or as a government official, if citizenship is required to occupy the position of the latter, as well as other exceptions if such have been explicitly promulgated.

<sup>797</sup> Article 24r(4) LARB.

<sup>798</sup> Article 35(1)(1) Law on Bulgarian Citizenship.

From 2014 to 2025, Bulgaria granted citizenship to 794 beneficiaries of international protection, namely 314 refugee status holders and 480 subsidiary protection holders.<sup>799</sup>

## 5. Cessation and review of protection status

### Indicators: Cessation

1. Is a personal interview of the asylum seeker in most cases conducted in practice in the cessation procedure?  Yes  No
2. Does the law provide for an appeal against the first instance decision in the cessation procedure?  Yes  No
3. Do beneficiaries have access to free legal assistance at first instance in practice?  Yes  With difficulty  No

According to Article 17(1) LAR, international protection may be ceased if the protection holder:

- (a) Can no longer refuse to avail him or herself of the protection of his or her country of origin, as the circumstances that had given rise to fears of persecution have ceased to exist and the transformation in said circumstances is substantial enough and of a non-temporary nature;
- (b) Voluntarily avails him or herself of the protection of his or her country of origin;
- (c) Voluntarily re-acquires citizenship after having lost it, or acquires new citizenship in another country;
- (d) Acquires Bulgarian citizenship;
- (e) Voluntarily settles in the country where he or she was previously persecuted;
- (f) Has been granted refugee status by the President; or
- (g) Explicitly declares to no longer wish to enjoy international protection granted in Bulgaria.
- (h) Is deceased.

Following the decision of the SAR's Chairperson to initiate a cessation procedure, a caseworker may suggest to cease protection based on available data indicating that one of the above legal grounds applies. The beneficiary of protection is to be notified by a letter with recorded delivery that such a procedure has been initiated, the reasons thereof and the date and place for a mandatory interview in which he or she will have the opportunity to raise any objections against the cessation of the protection status. As of the date of notification, the SAR has 3 months to issue a decision. Such decision can also be taken in the absence of opinion or objections by the protection status holder if they have not been made on his own failure. When the SAR has not established the grounds for cessation, the initiated procedure must be discontinued.

The cessation can be appealed within 14 days after being notified to the individual before the respective Regional Administrative Court. The appeal can be heard at two court instances where the decision of the second instance, the Supreme Administrative Court, is final. Legal aid can be appointed by the court on a request of the appellant (see section [Regular Procedure: Legal Assistance](#)).

Although there is no systematic review of protection status in practice, cessation procedures are initiated by the SAR when the MOI provides information indicating that status holders have either returned to their country of origin, obtained residence or citizenship in a third country, or have not renewed their Bulgarian identification documents for a period exceeding 3 years.

In 2025, a total of 850 cessations were made. The cessations affected individuals from the following countries of origin: <sup>800</sup>

<sup>799</sup> Ministry of Justice, reg. No.95-00-167 from 29 December 2025.

<sup>800</sup> SAR, reg. №АД-07-7 from 14 January 2025.

Cessation of refugee status: 2025	
Country of origin	Number
Iraq	1
Algeria	2
Armenia	1
Afghanistan	27
Stateless	23
DR Congo (Zaire)	1
Ethiopia	2
Iraq	31
Iran	6
Yemen	1
Yemen	1
Yemen	2
Congo	2
Syria	190
Türkiye	1
Ukraine	1

Cessation of subsidiary protection: 2025	
Country of origin	Number
Algeria	1
Armenia	6
Afghanistan	33
Bangladesh	2
Stateless	37
Iraq	211
Iran	9
Jordan	1
Cameroon	1
Congo	2
Cuba	1
Lebanon	2
Mali	1
Nigeria	4
Pakistan	2
Syria	237
Somalia	1
Sudan	2
Türkiye	5

Source: SAR.

In 2020, an amendment to the law introduced an additional clause, which allows cessation or revocation of international protection where the status holders fail to renew their expired Bulgarian identity documents, or to replace them if they have been lost, stolen or destroyed, in a period of 30 days.<sup>801</sup> Despite being contrary to 1951 Refugee Convention, the amendment was aimed at legalising a malpractice applied by the SAR since 2018. This broadened interpretation of the recast Qualification Directive introduces *de facto* an additional cessation ground in violation of national and EU legislation. The undue cessation of international protection has affected 4,264 status holders in total, respectively – 770 persons in 2018; 2,608 persons in 2019; 886 persons in 2020, 105 in 2021, and 41 in 2022, 0 in 2023, 0 in 2024, and 850 persons in 2025.<sup>802</sup>

The introduction of said additional clause led national courts in some European countries to halt transfers of beneficiaries of protection to Bulgaria in 2022.<sup>803</sup> In 2025 however, several courts found that beneficiaries of protection could be sent back to Bulgaria.

In Germany, most courts are of the opinion that removals of beneficiaries of protection to Bulgaria are lawful. By way of exception, some administrative courts have found – in the case of the administrative court of Potsdam even before the outbreak of the war in Ukraine - that even non-vulnerable persons face destitution and homelessness upon arrival.<sup>804</sup> The Federal State government of Lower Saxony issued guidance on 21 February 2022 according to which transfers are only admissible for healthy persons who are fit to work, and not for single parents, families with minor children and persons unable to work.<sup>805</sup> In 2025, administrative courts continued to uphold the permissibility of returning beneficiaries of international protection to Bulgaria, while at the same time scrutinising closely the lawfulness of accompanying return measures. This is illustrated by the judgment of the Administrative Court Bayreuth of 28 July 2025 (B 7 K 25.30925), where the court confirmed that a subsequent asylum application by a healthy and employable beneficiary of subsidiary protection in Bulgaria could be rejected as inadmissible under § 29(1) No. 2 and No. 5 Asylum Law, applying the high threshold developed by the CJEU and the ECtHR for violations of Art. 3 ECHR / Art. 4 CFR.<sup>806</sup> At the same time, however, the court partially upheld the action by obliging the authorities to lift the existing deportation order and entry ban, emphasising that new factual developments—such as serious mental illness, the appointment of a legal guardian, and the establishment of a marital family life in Germany protected by Art. 6 of the German Constitution (GG)—must be properly taken into account, at least with regard to the continued enforceability of return measures.<sup>807</sup> A similar pattern can be observed in other 2025 case law, including decisions of the Administrative Court of Osnabrück, which reaffirmed that poor socio-economic conditions or limited integration prospects in the responsible Member State are, as such, insufficient to bar return of protection beneficiaries, but insisted on an individualized assessment where concrete vulnerabilities or family ties may render removal measures unlawful or require reconsideration by the competent authorities.<sup>808</sup> Likewise, on 12 March 2025, the Higher Administrative Court of Baden-Württemberg (*VGH Baden-*

---

<sup>801</sup> Article 42(5) LAR, enforced on 20 October 2020.

<sup>802</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>803</sup> (Germany) Administrative Court of Düsseldorf, 12 L 1073/22.A, 25 May 2022. District Court of the Hague, NL22.2064 en NL22.2066 T, 8 July 2022, available at: <https://bit.ly/42POziX>; District Court of the Hague, NL22.2064 en NL22.2066, 26 October 2022, available at: <https://bit.ly/3nmnxiZ>.

<sup>804</sup> Administrative Court of Frankfurt / Oder, 10 K 803/22.A, 6 January 2023; Administrative Court of Oldenburg, 12 A 849/22, 2 March 2023; Administrative Court of Saarland, 3 L 1057/23, 20 July 2023; Administrative Court of Potsdam, 12 K 2418/20.A, 11 January 2022; Administrative Court of Ansbach, 14 S 22.50126, 31 October 2022, available in German at: <https://bit.ly/4738dJb>; Administrative Court of Köln, 20 K 3733/22.A, 15 November 2022, available in German at: <https://bit.ly/48nFdwU>; Administrative Court of Freiburg, A 14 K 900/22, 19 September 2022, available in German at: <https://bit.ly/3GRyCza>. See also Justus Linz, *Zur Situation von »Dublin-Rückkehrenden« und »Anerkannten« in Staaten Osteuropas*, September 2022, *asyl.net*, 3, available in German at: <https://bit.ly/3JdJ7PH>.

<sup>805</sup> Ministry for the Interior and Sports of Lower Saxony, *Abschiebungsvollzug von anerkannt Schutzberechtigten nach Bulgarien*, 21 February 2022, available in German at: <http://bit.ly/3Y1o1rT>.

<sup>806</sup> Administrative Court Bayreuth, 28 July 2025 (B 7 K 25.30925), available [here](#).

<sup>807</sup> *Ibid.*

<sup>808</sup> Administrative Court Osnabrück, 18 November 2025, Az.: 7 A 252/23, available [here](#).

*Württemberg*) reaffirmed its established case law that returning healthy, employable and non-vulnerable single men to Bulgaria does not, in general, expose them to a real risk of inhuman or degrading treatment within the meaning of Art. 3 ECHR and Art. 4 of the EU Charter.<sup>809</sup> Relying on up-to-date country information and the high threshold set by the CJEU in *Jawo*, the court found that reception and living conditions in Bulgaria do not reach a level where such persons would be systematically unable to secure their most basic needs (“Bett, Brot und Seife”).<sup>810</sup>

In the Netherlands, in an internal information message of the IND, it is stated that for particular vulnerability it is important to assess whether someone is self-sufficient.<sup>811</sup> Moreover, the internal information message states that individual guarantees should be requested for particularly vulnerable beneficiaries of protection from Greece, Bulgaria and Hungary, given that protection beneficiaries returned to these Member States are in principle assumed to be at risk of facing a situation of extreme material poverty, as stated in the *Ibrahim* ruling.

## 6. Withdrawal of protection status

Refugee status ought to be withdrawn where:<sup>812</sup>

- (a) There are serious grounds to assume to have committed an act defined as a war crime or a crime against peace and humanity under the national legislation and under the international treaties;
- (b) There are serious grounds to assume that he or she has committed a serious non-political crime outside the territory of Bulgaria;
- (c) There are serious grounds to assume that he or she commits or incites towards acts contrary to the goals and principles of the United Nations;
- (d) The refugee benefits from the protection or assistance provided by bodies or organisations of the United Nations other than the United Nations High Commissioner for Refugees;
- (e) The competent authorities of his or her state of permanent residence have recognized the rights and obligations resulting from the citizenship in that country;
- (f) There is serious proof for regarding him or her as a danger to national security, or, having been convicted by an enforceable sentence of a serious crime, as a danger to the society

Refugee status shall also be ceased if the refugee used a false identity or produced a non-authentic, forged document or a document with false contents, while continuing to insist on their authenticity, or, intentionally gave, in an oral or written form, false information or withheld essential information concerning his or her case.

Subsidiary protection (“humanitarian status”) ought to be withdrawn if:

- (a) The same grounds applicable for the withdrawal of a refugee status are met;
- (b) A protection holder for whom there are serious reasons to assume that he or she has committed a serious crime;
- (c) The holder committed a crime outside the territory of Bulgaria for which the national law provides for a criminal sanction such as deprivation of liberty;
- (d) The holder left his/her country of origin solely in order to avoid criminal prosecution, unless the said prosecution endangers his or her life or is inhuman or degrading;

There are serious reasons to assume that he or she constitutes a serious danger to the host society or to the national security.

The procedure for withdrawing status in the law is the same as for [Cessation](#) of status. In 2024, a total of 57 withdrawals were made. The withdrawals affected individuals from the following countries of origin:<sup>813</sup>

---

<sup>809</sup> Higher Administrative Court (VGH) Baden-Württemberg, Decision of 12 March 2025 – A 4 S 256/24 (asyl.net: M33666), available [here](#).

<sup>810</sup> Ibid.

<sup>811</sup> IB 2021/56 asiolverzoeken van bijzonder kwetsbare statushouders, available in Dutch at: <https://bit.ly/3hCLBf6>.

<sup>812</sup> Article 12(1) LAR.

<sup>813</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

Withdrawal of refugee status: 2025	
Country of origin	Number
Syria	2
Stateless	5

Withdrawal of subsidiary protection: 2025	
Country of origin	Number
Iraq	4
Syria	58
Sudan	1

Source: SAR.

## B. Family reunification

### 1. Criteria and conditions

#### Indicators: Family Reunification

1. Is there a waiting period before a beneficiary can apply for family reunification?  Yes  No
  - ❖ If yes, what is the waiting period?
2. Does the law set a maximum time limit for submitting a family reunification application?  Yes  No
  - ❖ If yes, what is the time limit?
3. Does the law set a minimum income requirement?  Yes  No

The law does not request any waiting period before a beneficiary can apply for a family reunification, nor sets a maximum time limit for submitting a family reunification application.<sup>814</sup> Both recognised **refugees** and **subsidiary protection** holders are entitled to ask to be reunited with their families in Bulgaria without any distinction in the scope of their rights or procedures applicable. The family reunification permit is issued by the SAR.

#### 1.1 Eligible family members

Under the law, family reunification can be granted to the members of the extended family circle, namely:

- ❖ Spouses;
- ❖ Children under the age of 18;
- ❖ Cohabitants with whom the status holder has an evidenced stable long-term relationship and their unmarried underage children;
- ❖ Unmarried children who have come of age, and who are unable to provide for themselves due to grave health conditions;
- ❖ Parents of either one of the spouses who are unable to take care of themselves due to old age or a serious health condition, and who have to share the household of their children; and
- ❖ Parents or another adult member of the family who is responsible, by law or custom, for the underage unmarried status holder who has been granted international protection in Bulgaria.

<sup>814</sup> Article 34(1) LAR.

Unaccompanied children who have been granted international protection also have the right to reunite with their parents, but also with another adult member of their family or with a person who is responsible for them by law or custom when the parents are deceased or missing.<sup>815</sup>

Family reunification can be refused on the basis of an exclusion clause or with respect to a spouse in cases of polygamy when the status holder already has a spouse in Bulgaria.<sup>816</sup>

If the status holder is unable to provide official documents or papers certifying marriage or kinship, the latter can be established by a declaration on his behalf.<sup>817</sup>

## 1.2 Issuance of documents for family reunification

The family members issued a family reunification permit can obtain visas by the diplomatic or consular representations. The SAR has an obligation to facilitate the reunification of separated families by assisting the issuance of travel documents, visas as well as for their admission into the territory of the country.<sup>818</sup> However, in practice, Bulgarian consular departments have stopped issuing travel documents to minor children who have not been issued national documents after their birth, under the pretext of avoiding eventual child smuggling or trafficking.

Family members without national identity documents however experienced serious difficulties and delays as their right to be issued Bulgarian laissez-passers to replace the lacking passports was not respected uniformly by all consulate services and some needed further intervention to, and by the Consulate Directorate of the Ministry of Foreign Affairs (MFA). The MFA itself however continued to request in all of these cases the usual supporting documents, e.g. documents proving sufficient financial means or secured housing, which should have not been the case in visa applications based on family reunification procedure due to the previous vetting and special exclusions with regard to these requirements, envisaged and implemented by the asylum agency SAR when issuing the family reunification permit.<sup>819</sup>

Since 2022, beneficiaries of international protection, mainly from Syria began reporting that their family members experienced serious problems to even approach the Bulgarian consulate services in Istanbul, Ankara and Bursa in Türkiye in order to apply for reunification visas or laissez-passers. A joint NGO communication to MFA raised concerns<sup>820</sup> and requested transparent rules of work to be adopted by these services, however no answer or measures were undertaken in this respect until the end of 2025. In attempt to support the family members in February 2024 the SAR issued a leaflet with useful information on visa application in most common Bulgarian consulates where the family members of refugees and humanitarian status holders apply for their entry visas. The leaflet was prepared and translated in Arabic, Farsi, Dari and Pashto languages by the non-governmental organisation Bulgarian Helsinki Committee, funded by UNHCR.

In 2025, a total of 347 family reunification applications were submitted to the SAR, out of which 296 were approved and 51 rejected.<sup>821</sup>

## 2. Status and rights of family members

Family members are granted the same status as their sponsors. The procedure is almost automatic. It includes registration and, in some cases, an interview to cross-establish the family link, if documents to prove it are unavailable, expired or not original.

---

<sup>815</sup> Article 34(4) LAR.

<sup>816</sup> Article 34(3) LAR.

<sup>817</sup> Article 34(5) LAR.

<sup>818</sup> Article 34(7)-(8) LAR.

<sup>819</sup> Ministry of Foreign Affairs, Consulate Department, reg. N KOB-25-00-1 from 25 August 2021.

<sup>820</sup> Bulgarian Helsinki Committee, Foundation Access to Rights, communication to MFA from 28 April 2023.

<sup>821</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

## C. Movement and mobility

### 1. Freedom of movement

There are no limitations on the freedom of movement of the beneficiaries of international protection. There is no difference between the rights of refugees and subsidiary protection holders in this respect.

Beneficiaries are not dispersed according to a distribution scheme. If applied, the integration scheme foreseen under the 2017 Integration Decree would disperse those who opt to be enrolled according to the area of the municipality which provides the integration support and which was chosen by the beneficiary. The 2017 Integration Decree, however, has not been put into operation so far, although for the first time since its adoption **Vitosha** and **Oborishte** Districts (Sofia municipality) starting from 2021 provided only 131 status holders integration support,<sup>822</sup> all with integration funding provided under the EU relocation scheme, not by the general national integration mechanism.<sup>823</sup>

Based on the two types of international protection in Bulgaria, refugee status and subsidiary protection (“humanitarian status”), the travel documents issued are also two types: (a) travel document for refugees and (b) travel document of foreigners granted humanitarian status.<sup>824</sup>

The validity of the **refugee** travel document is up to 5 years, but it cannot have a different validity from the national refugee identity card, which can be valid for up to 5 years. The travel document of individuals granted **humanitarian status** is up to 3 years and mirrors the validity of the national identity card.

National law does not apply any geographical limitations or areas of permitted travel. However, travel to the country of origin may be considered as a ground for **Cessation** of the status granted.

Bulgaria also issues two other types of travel documents related to asylum and family reunification. Individuals granted asylum by the President of the Republic are issued travel documents with validity up to 5 years. Family members of refugee or humanitarian status holders granted a family reunification permit who do not have a valid national passport or other replacing documents can be issued a temporary travel document to enter Bulgaria to join the status holder (see **Family Reunification: Criteria and Conditions**). The law does not envisage any specific duration or validity of these travel documents and in practice their duration is decided *ad hoc* according to the individual circumstances of each case.

All identity documents in Bulgaria are issued by the Ministry of Interior, Bulgarian Identity Documents Directorate. The usual time limit for issuance is 30 calendar days, but the beneficiary can pay for a speedy delivery within 10 calendar days.

During the period between 1 January 2014 and 31 December 2025, the Ministry of Interior issued 12,913 refugee travel documents and 29,785 travel documents for subsidiary protection holders.<sup>825</sup>

### 2. Travel documents

Based on the two types of international protection in Bulgaria, refugee status and subsidiary protection (“humanitarian status”), the travel documents issued are also two types: (a) travel document for refugees and (b) travel document of foreigners granted humanitarian status.<sup>826</sup>

---

<sup>822</sup> SAR statistics, 2021: 83 beneficiaries, 2022: 20 beneficiaries, 2023: 22 beneficiaries and 2024: 8 beneficiaries.

<sup>823</sup> Statistics provided by the Bulgarian Council for Refugees and Migrants on 13 January 2025.

<sup>824</sup> Article 59(1)(5) and (7) Law on Bulgarian Identity Documents.

<sup>825</sup> MOI, Identity Documents Directorate, reg. №812104-1103 from 10 February 2026.

<sup>826</sup> Article 59(1)(5) and (7) Law on Bulgarian Identity Documents.

The validity of the refugee travel document is up to 5 years, but it cannot have a different validity from the national refugee identity card, which can be valid for up to 5 years. The travel document of individuals granted humanitarian status is up to 3 years and also mirrors the validity of the national identity card.

National law does not apply any geographical limitations or areas of permitted travel. However, travel to the country of origin may be considered as a ground for [Cessation](#) of the status granted.

Bulgaria also issues two other types of travel documents related to asylum and family reunification. Individuals granted asylum by the President of the Republic are issued travel documents with validity up to 5 years. Family members of refugee or humanitarian status holders granted a family reunification permit who do not have a valid national passport or other replacing documents can be issued a temporary travel document to enter Bulgaria in order to join the status holder (see [Family Reunification: Criteria and Conditions](#)). The law does not envisage any specific duration or validity of these travel documents and in practice their duration is decided ad hoc according to the individual circumstances of each case.

All identity documents in Bulgaria are issued by the Ministry of Interior, Bulgarian Identity Documents Directorate. The usual time limit for issuance is 30 calendar days, but the beneficiary can pay for a speedy delivery within 10 calendar days.

## D. Housing

### Indicators: Housing

- |   |                  |
|---|------------------|
| 1. For how long are beneficiaries entitled to stay in reception centres?        | 0 months         |
| 2. Number of beneficiaries staying in reception centres as of 31 December 2025: | 6 <sup>827</sup> |

At the end of 2020, the law was amended to abolish the provision which foresaw financial support for housing for a period of up to 6 months as from the date of entry into force of the decision for granting international protection.<sup>828</sup> In practice, however, some more vulnerable beneficiaries of international protection are still allowed to remain in the reception centres for couple of months due to lack of any integration support (see [General Remark on Integration](#)), unless in situations of mass influx or increased new arrivals. At the end of 2025, the number of beneficiaries staying in reception centres was 6.<sup>829</sup>

## E. Employment and education

### 1. Access to the labour market

Access to the labour market is automatic and unconditional. There is no difference between refugees and subsidiary protection beneficiaries in this respect. No labour market test is applied and access is not limited to certain sectors. Beneficiaries of international protection face the usual obstacles related to lack of language knowledge and related lack of adequate state support for vocational training, if necessary or offered.

Professional qualifications obtained in the country of origin are not recognised in general. The law does not provide for a solution with respect to refugees and subsidiary protection beneficiaries except the general rules and conditions for legalization of diplomas. On its own, the latter constitutes a complicated procedure which in most of the cases requires re-taking of exams and educational levels.

In 2025, the SAR issued 847 work permits to asylum seekers who were looking to support themselves

<sup>827</sup> 143<sup>rd</sup> Coordination meeting, held on 18 December 2025.

<sup>828</sup> Para 4 of Article 32 LAR, State Gazette, N89 from 16 October 2020.

<sup>829</sup> 143<sup>rd</sup> Coordination meeting, held on 18 December 2025.

while their asylum claims were being processed.<sup>830</sup> Out of them, only 2% (3 asylum seekers and 16 persons granted international protection) were employed through employment programs, while the rest found work independently and on their own initiative.<sup>831</sup> At the same time, a total of 315 persons with temporary protection were employed through employment programs.<sup>832</sup>

## 2. Access to education

Access to education for refugees or beneficiaries of subsidiary status occurs under the same rules as for asylum seekers (see [Reception Conditions: Access to Education](#)).

## F. Social welfare

Beneficiaries of international protection have access to all types of social assistance envisaged by the law.<sup>833</sup> The law foresees the same conditions for nationals, recognised refugees or subsidiary protection holders.

In practice, however, some types of the social assistance cannot be enjoyed by beneficiaries of international protection without additional special arrangements (e.g. interpretation, social mediation), which are not envisaged or secured to them by law or institutionally.

The Agency for Social Assistance (Агенция за социално подпомагане, ASA) of the Ministry of Labour and Social Policy is the authority responsible for the provision of all types of social assistance available nationally.<sup>834</sup> The ASA has territorial units in every district and municipality in Bulgaria.

The provision of social welfare is not tied to a requirement to reside in a specific place or region. However, social assistance can be requested only from the ASA territorial unit where the beneficiary has his or her registered residence and formal address registration.

In practice, the residence requirement creates great obstacle for beneficiaries who had their domicile registered in the location of the reception centre where they were accommodated during the status determination in order to speed up issue of identity documents, until this was no longer allowed by the SAR (see [Civil Registration](#)). If beneficiaries opt to move and settle in another location, they must not only re-register their new permanent domicile – and on that basis re-issue their identity documents – but they still will not be able to immediately access social assistance services or available support, as many are also conditioned on residence in the respective municipality for certain period of time.

In addition, the lengthy and complex procedures related to the submission of social assistance applications are difficult to overcome even for nationals and almost impossible for beneficiaries of international protection, unless supported by tailored mediation or assistance. Such kind of assistance, however, is provided entirely by NGOs or grassroots support groups, but it is not always available due to capacity and funding limitations.

Since 2018, the Bulgarian Helsinki Committee has been litigating against the unlawful refusal of child care support to the beneficiaries of subsidiary protection. In 2022, the ASA applied same approach toward the child support to the beneficiaries of temporary protection. Despite the unanimous jurisprudence of the national courts proclaiming the practice unlawful and discriminatory<sup>835</sup> in more than 760 positive court

---

<sup>830</sup> SAR, reg. №ПО-02-115 from 22 February 2026.

<sup>831</sup> Employment Agency, reg. No. РД-08-16 from 7 January 2026.

<sup>832</sup> Ibid.

<sup>833</sup> Article 2(1) Law on Social Assistance.

<sup>834</sup> Article 5 Law on Social Assistance.

<sup>835</sup> First decision №6608 from 13 November 2018, Administrative Court Sofia-City, 61st chamber, case №5349/2018.

decisions<sup>836</sup> ever since, the Agency for Social Assistance continued to maintain it until the date of publication of this report.

## G. Health care

With respect to health care, the same rules that apply for asylum seekers are also applicable for beneficiaries of international protection (see [Reception Conditions: Health Care](#)). In general, from the first day after recognition, health insurance paid until then by the SAR ceases with respect to beneficiaries of international protection and they have to cover on their own the monthly health insurance payment. In 2025, this minimum fee was 37.32 BGN / 19.13 € for unemployed persons who do not receive indemnities.<sup>837</sup>

In 2025, both beneficiaries for international protection and asylum seekers had unrestricted access to vaccination against COVID-19.

---

<sup>836</sup> Bulgarian Helsinki Committee, 'БХК настоява МТСП да прекрати институционалната дискриминация срещу украинските бежанци у нас', published on 25 October 2024, available in Bulgarian [here](#).

<sup>837</sup> Article 40(5)(1) Law on Health Insurance. 8% deducted from ½ of the minimum wage.

## ANNEX I - Transposition of the CEAS in national legislation

### Directives and other CEAS measures transposed into national legislation

Directive	Deadline for transposition	Date of transposition	Official title of corresponding act	Web Link
<b>Directive 2011/95/EU</b> Recast Qualification Directive	21 December 2013	16 October 2015	Law on Amendment of the Law on Asylum and Refugees, State Gazette No.80/16 October 2015	<a href="https://bit.ly/3xbI52v">https://bit.ly/3xbI52v</a>
<b>Directive 2013/32/EU</b> Recast Asylum Procedures Directive	20 July 2015	25 December 2015	Law on Amendment of the Law on Asylum and Refugees, State Gazette No.101/22 December 2015	<a href="https://bit.ly/43smCOZ">https://bit.ly/43smCOZ</a>
		19 October 2020	Law on Amendment of the Law on Asylum and Refugees, State Gazette No.89/16 October 2020	<a href="https://bit.ly/494u9VB">https://bit.ly/494u9VB</a>
<b>Directive 2013/33/EU</b> Recast Reception Conditions Directive	20 July 2015	19 October 2020	Law on Amendment of the Law on Asylum and Refugees, State Gazette No.89/16 October 2020	<a href="https://bit.ly/494u9VB">https://bit.ly/494u9VB</a>
<b>Regulation (EU) No 604/2013</b> Dublin III Regulation	Directly applicable 20 July 2013			

On 8 November 2018 the European Commission sent a letter of formal notice to the **Bulgarian** government concerning the incorrect implementation of EU asylum legislation.<sup>838</sup> The Commission found that shortcomings in the Bulgarian asylum system and related support services were in breach with provisions of the recast Asylum Procedures Directive, the recast Reception Conditions Directive and the Charter of Fundamental Rights. Concerns related in particular to: the accommodation and legal

<sup>838</sup> European Commission, 'November infringements package: key decisions', MEMO/18/6247, 8 November 2018, available at: <https://bit.ly/2RETZfR>.

representation of unaccompanied children; the correct identification and support of vulnerable asylum seekers; provision of adequate legal assistance; and the detention of asylum seekers as well as safeguards within the detention procedure. The Commission indicated that if Bulgaria would not act within the next two months, the Commission would proceed with sending a reasoned opinion on this matter. In January 2019 the EC delegation made a follow-up visit to Bulgaria to inquire the post-notification developments, but further information on this was not made publicly available. In 2020, Bulgaria adopted amendments to its national law which re-arranged the mandatory legal representation of unaccompanied asylum seeking and refugee children.<sup>839</sup> The responsibility for legal representation has been shifted from the local municipalities to selected legal aid lawyers from the National Legal Aid Bureau (NLAB), with requirements for qualification and clearly outlined responsibility and liability.

In 2020, an amendment to the law introduced an additional clause, which allows cessation or revocation of international protection where the status holder fails to renew expired Bulgarian identity documents, or to replace them if they have been lost, stolen or destroyed, in a period of 30 days.<sup>840</sup> Despite being contrary to 1951 Refugee Convention, the amendment was aimed at legalising a malpractice applied by the SAR since 2018. This broadened interpretation of the recast Qualification Directive introduces *de facto* an additional cessation ground in violation of national and EU legislation.

---

<sup>839</sup> National Parliament, Law on Amendment of the Law on Asylum and Refugees, State Gazette №89 from 16 October 2020, available at: <https://bit.ly/37eFDJ9>.

<sup>840</sup> Article 42(5) LAR, enforced on 20 October 2020.

## Annex II – EU Pact on Migration and Asylum

In this political and institutional context, as described in the paragraph above, preparations for the implementation of the EU Pact on Migration and Asylum stalled. According to the National Plan for Pac implementation adopted by the government<sup>841</sup>, alongside other technical and organizational measures, two key legislative amendments were envisaged: the drafting of an entirely new Law on Asylum and Refugees, with a deadline for adoption of 31 December 2025<sup>842</sup>, as well as amendments to the provisions of the primary and secondary immigration legislation in order to establish rules for screening and detention of third-country nationals after the expiry of the 24-hour police arrest period, again with a deadline for adoption<sup>843</sup> by 31 December 2025. Other measures in the Plan provided for the establishment of screening centres under the General Directorate Border Police (GDBP) in Elhovo and Dragoman, as well as the construction of three screening centres for the immigration police (Directorate Migration, DM) — two for unaccompanied minors: one in Sofia, with a capacity of 50 places, and one in Elhovo, with a capacity of 90 places; and one screening centre in Lyubimets for irregular third-country nationals identified within the interior of the country, with a capacity of 540 places.

As of the date of this report, none of the measures described above had been implemented. While the delay in establishing the screening centres is not critical, given that the police authorities are adapting for this purpose buildings within already existing police detention facilities, the fact that relevant legislation has not yet been amended might lead to missing the deadline of 12 June 2026. Nevertheless, amendments to the primary immigration legislation have been finalized by the Ministry of Interior, and their publication for public consultation is expected in March 2026, with submission to Parliament planned<sup>844</sup> for April 2026. However, the adoption of the new Law on Asylum and Refugees has been drastically compromised. On 24 February 2025, an inter-institutional working group under the State Agency for Refugees began work on the draft law, and by mid-May 2025 four chapters had been prepared and agreed upon. Following the dismissal of the Agency's leadership on 4 June 2025, the inter-institutional working group did not hold a single meeting until 7 November 2025, when the participating government stakeholders were invited to be presented with a final version of an entirely different draft law prepared by legal experts of the Agency. Despite the predominantly negative opinion expressed on this draft by the members of the inter-institutional working group, in January 2026 the caretaker government published the draft law for public consultation<sup>845</sup> without having conducted the formal inter-ministerial coordination procedure with the ministries and other competent authorities. By the close of the public consultation procedure on 25 February 2026, all opinions submitted on the draft law were against its adoption.<sup>846</sup>

---

<sup>841</sup> Legal Information Portal of the Council of Ministers of the Republic of Bulgaria, Decision №883 from 19 December 2024 adopting Plan for Implementation by the Republic of Bulgaria of the European Union's Pact on Migration and Asylum, published on 21 January 2025, available [here](#) in Bulgarian.

<sup>842</sup> Decision №833 from 19 December 2024 adopting Plan for Implementation by the Republic of Bulgaria of the European Union's Pact on Migration and Asylum, published on 21 January 2025, available [here](#) in Bulgarian, point 3.1.1.

<sup>843</sup> Decision №833 from 19 December 2024 adopting Plan for Implementation by the Republic of Bulgaria of the European Union's Pact on Migration and Asylum, published on 21 January 2025, available [here](#) in Bulgarian, point 2.1.1.

<sup>844</sup> Teleconference with MOI Legal and Information Directorate on 2 March 2026.

<sup>845</sup> Portal for Public Consultations, Law on International Protection draft, published on 26 January 2026, available [here](#) in Bulgarian.

<sup>846</sup> Ibid.