

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

■ Types of accommodation

Indicators: Types of Accommodation	
1. Number of reception centres: ⁵⁵⁶	4
2. Total number of places in the reception centres:	3,125 ⁵⁵⁷
3. Total number of places in private accommodation:	362 ⁵⁵⁸
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:

⁵⁵⁶ Both permanent and for first arrivals. Note that the Refugee Reception Centre Sofia has 3 reception shelters, namely Ovcha Kupel, Vrazhdebna and Voenna Rampa.

⁵⁵⁷ SAR, reg. №ПО-02-115 from 22 February 2026.

⁵⁵⁸ 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	10 ⁵⁵⁹
Banya	Central Bulgaria	70	64	54	0
Pastrogor	South-Eastern Bulgaria	300	108	35	0
Harmanli	South-Eastern Bulgaria	1576	1,410	898	63
	Total	3,125	2,736	1,579	273

Source: SAR.⁵⁶⁰ 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.⁵⁶¹ However, in December 2022 the appointed earlier during that year new SAR management shared⁵⁶² 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 centres⁵⁶³ 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 refurbishment⁵⁶⁴ 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 2023⁵⁶⁵ 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 11,717,200.⁵⁶⁶ In 2025 however, the new politically appointed SAR leadership⁵⁶⁷ 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 Program⁵⁶⁸ 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%⁵⁶⁹ by the end of the year, when

⁵⁵⁹ 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.

⁵⁶⁰ SAR, reg. №ПО-02-115 from 22 February 2026.

⁵⁶¹ 110th Coordination meeting held on 10 January 2022.

⁵⁶² 118th Coordination meeting held on 22 December 2022.

⁵⁶³ SAR, reg. №ПО-02-115 from 22 February 2026.

⁵⁶⁴ SAR, reg. №АД-07-7 from 14 January 2025.

⁵⁶⁵ SAR reg.№ЦУ-РД05-123/27.02.2024.

⁵⁶⁶ SAR, reg. №АД-07-7 from 14 January 2025.

⁵⁶⁷ See, the paragraph above, National context.

⁵⁶⁸ COM No.145 from 10 March 2022.

⁵⁶⁹ 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%)⁵⁷⁰ absconding rate of Afghan applicants and the rising (30%)⁵⁷¹ 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.⁵⁷² 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.⁵⁷³ 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](#)).⁵⁷⁴

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

⁵⁷⁰ 1,969 terminated procedures out of all 1,980 Afghan applicants.

⁵⁷¹ 4,357 terminated procedures out of all 7,646 Syrian applicants.

⁵⁷² Article 29(9) LAR.

⁵⁷³ Ibid.

⁵⁷⁴ 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.⁵⁷⁵ In 2022 an SAR internal revision of the reception centres' capacity revealed it⁵⁷⁶ 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 accommodation⁵⁷⁷ in all of its reception centres. The asylum agency continued to be severely underfunded in general. The SAR annual budgets were,⁵⁷⁸ 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 refurbishment⁵⁷⁹ 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 leadership⁵⁸⁰ 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.⁵⁸¹ 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 2025.⁵⁸²

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 offer⁵⁸³ 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 2015.⁵⁸⁴ 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.

⁵⁷⁵ 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.

⁵⁷⁶ 118th Coordination meeting held on 22 December 2022.

⁵⁷⁷ SAR, reg. №ПО-02-115 from 22 February 2026.

⁵⁷⁸ SAR reg. №АД-07-47 from 9 December 2024.

⁵⁷⁹ SAR reg.№ЦУ-РД05-123/27.02.2024.

⁵⁸⁰ See, [National context](#).

⁵⁸¹ 129th Coordination meeting, 9 May 2024.

⁵⁸² SAR, reg. №ПО-02-115 from 22 February 2026: disinfections carried out in all centres on a monthly basis.

⁵⁸³ National Statistical Institute, Annual inflation rates: +2.2% in 2024; +9.5% in 2023; and +17% in 2022, available in Bulgarian [here](#).

⁵⁸⁴ 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 2025,⁵⁸⁵ 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.⁵⁸⁶

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.⁵⁸⁷ In 2022⁵⁸⁸ and 2023,⁵⁸⁹ 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,⁵⁹⁰ to engage the police in guarding of the reception centres, but the MOI initiated a procedure in this sense only by the end of 2023,⁵⁹¹ 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,⁵⁹² but the MOI took over the guarding of the reception centres of the SAR as late as in October 2025.⁵⁹³ 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.⁵⁹⁴ In December 2025, the SAR reported to have its reception occupancy at 8%, i.e. 273 occupants out of 3,125 available places,⁵⁹⁵ compared to 49% or 1,579 occupants at the end of 2024; 2,736 at the end of 2023; 2,412 occupants at

⁵⁸⁵ SAR, reg. №ПО-02-115 from 22 February 2026.

⁵⁸⁶ Ibid.

⁵⁸⁷ 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](#).

⁵⁸⁸ Bulgarian Helsinki Committee, reg.No.Б-67 from 4 August 2022.

⁵⁸⁹ Bulgarian Helsinki Committee, reg.No.Б-88 from 18 September 2023.

⁵⁹⁰ SAR, reg. No. №РД05-31 from 15 January 2024; SAR reg. №АД-07-7 from 14 January 2025.

⁵⁹¹ 127th Coordination meeting, held on 28 December 2023.

⁵⁹² 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](#).

⁵⁹³ SAR, 2024 Annual Activity Report, published in May 2025, available [here](#) in Bulgarian.

⁵⁹⁴ Article 29(4)-(9) LAR.

⁵⁹⁵ 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?
❖ If yes, when do asylum seekers have access the labour market? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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?
❖ 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?
❖ 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.⁵⁹⁶ 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,⁵⁹⁷ 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.⁵⁹⁸

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.⁵⁹⁹ 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.⁶⁰⁰ At the same time, a total of 315 persons with temporary protection were employed through employment programs.⁶⁰¹

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.⁶⁰²

⁵⁹⁶ Article 29(3) LAR.

⁵⁹⁷ 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>.

⁵⁹⁸ Article 39(1)(2) LAR.

⁵⁹⁹ SAR, reg. №ПО-02-115 from 22 February 2026.

⁶⁰⁰ Employment Agency, reg. No. РД-08-16 from 7 January 2026.

⁶⁰¹ Ibid.

⁶⁰² 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.⁶⁰³ 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 2025.⁶⁰⁴

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.⁶⁰⁵

Asylum-seeking children with special needs do not enjoy alternative arrangements other than those provided for Bulgarian children.⁶⁰⁶

Moreover, asylum-seeking children may be detained in closed reception centres or facilities following the detention of their parents.⁶⁰⁷ 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

⁶⁰³ Article 26(1) LAR.

⁶⁰⁴ SAR, reg. №ПО-02-115 from 22 February 2026.

⁶⁰⁵ SAR, reg. No.РД05-72 from 26 February 2023 / SAR, reg. No. №РД05-31 from 15 January 2024.

⁶⁰⁶ National Integration Plan for Children with Special Needs and/or Chronic Illness, adopted with Council of Ministers Ordinance No 6, 19 August 2002.

⁶⁰⁷ Article 45e LAR.

Asylum seekers are entitled to the same level of health care as nationals.⁶⁰⁸ 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.⁶⁰⁹ 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.⁶¹⁰

A total of 2,144 outpatient examinations were implemented in the reception centres' surgeries throughout 2025.⁶¹¹ However the access of asylum seekers to following and specialized medical treatment remained impeded.

⁶⁰⁸ Article 29(1)(5) LAR.

⁶⁰⁹ Article 29(8) LAR.

⁶¹⁰ EUAA, Annual Asylum Report (2023), available at: <https://bit.ly/3JbdHYK>.

⁶¹¹ SAR, reg. №ПО-02-115 from 22 February 2026.

decisions⁸³⁶ 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.⁸³⁷

In 2025, both beneficiaries for international protection and asylum seekers had unrestricted access to vaccination against COVID-19.

⁸³⁶ Bulgarian Helsinki Committee, 'БХК настоява МТСП да прекрати институционалната дискриминация срещу украинските бежанци у нас', published on 25 October 2024, available in Bulgarian [here](#).

⁸³⁷ 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
Directive 2011/95/EU 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	https://bit.ly/3xbI52v
Directive 2013/32/EU 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	https://bit.ly/43smCOZ
		19 October 2020	Law on Amendment of the Law on Asylum and Refugees, State Gazette No.89/16 October 2020	https://bit.ly/494u9VB
Directive 2013/33/EU 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	https://bit.ly/494u9VB
Regulation (EU) No 604/2013 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.⁸³⁸ 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

⁸³⁸ 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.⁸³⁹ 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.⁸⁴⁰ 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.

⁸³⁹ 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>.

⁸⁴⁰ 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 government⁸⁴¹, 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 2025⁸⁴², 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 adoption⁸⁴³ 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 planned⁸⁴⁴ 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 consultation⁸⁴⁵ 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.⁸⁴⁶

⁸⁴¹ 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.

⁸⁴² 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.

⁸⁴³ 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.

⁸⁴⁴ Teleconference with MOI Legal and Information Directorate on 2 March 2026.

⁸⁴⁵ Portal for Public Consultations, Law on International Protection draft, published on 26 January 2026, available [here](#) in Bulgarian.

⁸⁴⁶ Ibid.