19 June 2026

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the fourth payment request submitted by Bulgaria on 2 April 2026, transmitted to the Economic and Financial Committee by the European Commission

Executive summary

In accordance with Article 24(2) of Regulation (EU) 2021/241, on 2 April 2026, Bulgaria submitted a request for payment for the fourth instalment of the non-repayable support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Bulgaria provided due justification of the satisfactory fulfilment of 23 out of 26 milestones and targets of the fourth instalment of the non-repayable support, as set out in Section 2.1.1 of the Council Implementing Decision of 4 May 2022 on the approval of the assessment of the recovery and resilience plan for Bulgaria[1].

For one milestone and four targets covering a large number of beneficiaries, in addition to the summary documents and official listings provided by Bulgaria, Commission services have assessed a statistically significant sample of individual files. The sample size has been uniformly set at 60 which corresponds to a confidence level of 95% or above in all cases.

In its payment request, Bulgaria has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary. Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Bulgaria, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of 23 out of 26 milestones and targets.

One milestone (M218) has previously been subject to a negative assessment and a partial suspension of disbursement adopted by the Commission pursuant to Article 24(6) of Regulation (EU) 2021/241. Following the revision of the Council Implementing Decision of 28 May 2026, milestone 218 has been moved to the fourth payment request which led to the cancellation of the partial suspension of disbursement adopted by the Commission pursuant to Article 24(6) of Regulation (EU) 2021/241 of 3 November 2025. Therefore, on the basis of the information provided under the fourth payment request, the Commission has carried out the preliminary assessment of the milestone concerned and concluded that this is satisfactorily fulfilled.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Bulgaria's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, the entry into force of legislation concerning the set-up of a politically independent anti-corruption body, the entry into force of legal acts in the field of vocational education and training, the establishment of a National Fund for Decarbonisation, the signature of new public service contracts for public rail transport services, and the entry into force of legislation on electric mobility. The

[1] ST 8091/22; ST 8091/22 ADD1 as amended by ST 15837/2023 INIT; ST 15837/2023 ADD 1; ST 11242/2025 INIT;ST 11242/2025 INIT ADD1, ST 15108/25; ST 15108/25 ADD 1; ST 8819/26, ST 8819/26 ADD1

milestones and targets also confirm progress towards the completion of investment projects related to financial support to small and medium sized companies, the establishment of a geothermal tool and an electronic information system in agriculture, investments in the field of digitalisation of administrative justice and renewable energy installations, as well as the signature of contracts for medical equipment and the construction of outpatient care units.

By the transmission of this positive preliminary assessment and in accordance with Article 24(4) of Regulation (EU) 2021/241, the Commission asks for the opinion of the Economic and Financial Committee on the satisfactory fulfilment of the relevant milestones and targets.

Contents

Number and name of the Milestone: 4 Entry into force of legal act(s) in the field of vocational education and training 5

Number and name of the Target: 49 Budget execution - transfer of at least EUR 12.59 million for digitalisation 8

Number and name of the Target: 60 Companies supported 11

Number and name of the Milestone: 65 Contract and operating rules 13

Number and name of the Target: 78 Payment(s) for solar domestic hot water or photovoltaic systems 17

Number and name of the Milestone: 93 Conditions for a new state-owned holding company 19

Number and name of the Milestone: 106 Geothermal tool 22

Number and name of the Milestone: 136 Electronic agricultural information system 25

Number and name of the Milestone: 163 Measures on transport 28

Number and name of the Milestone: 165 New public service contract(s) (PSC) for public rail transport services 31

Number and name of the Milestone: 178 Entry into force of legal act(s) on electric mobility 36

Number and name of the Milestone: 181 Low-emission zones 39

Number and name of the Milestone: 215 Entry into force of legal act(s) on e-justice in administrative cases 43

Number and name of the Milestone: 218 Entry into force of legal act(s) providing for the set-up of an Anti-corruption body 48

Number and name of the Milestone: 223 Entry into force of legal act(s) on lobbying activities 63

Number and name of the Milestone: 258 Upgrade of the Unified Courts Information System 66

Number and name of the Milestone: 260 Information modules and hardware for the digitalisation of litigation processes in administrative justice 74

Number and name of the Milestone: 278 Upgraded Monitorstat system 80

Number and name of the Milestone: 285 People trained to ensure their capacity to implement the RRP 83

Number and name of the Target: 304 Territorial structures of the Social Assistance Agency renovated 86

Number and name of the Milestone: 332 Signature of contract(s) for construction and/or renovation works and for supply of medical equipment 88

Number and name of the Milestone: 343 Signature of contract(s) for the construction and/or renovation works for outpatient units or mobile ambulatory containers as well as the supply of equipment 94

Number and name of the Milestone: 348 Preparatory measures for liberalisation of retail market 107

Number and name of the Milestone: 4 Entry into force of legal act(s) in the field of vocational education and training

Related Measure: C1.R1 Reform in preschool and school education and vocational education and training

Qualitative Indicator: Provision in the legal act(s) indicating entry into force

Time: Q4 2025

1. Context:

The objective of this reform is to increase quality and access to education and training. The reform consists in the entry into force of legal act(s) concerning preschool and school education and vocational education and training.

Milestone 4 requires the entry into force of legal act(s) that shall provide for (i) the approval of the list of professions for vocational education and training (VET); (ii) the approval of at least a total of 250 of the following: state educational standards, plans, programmes for acquiring professional qualification; (iii) expansion of the role of employers in the amendment of the list of professions for VET; and (iv) online training offers.

Milestone 4 is the fourth and last milestone of the reform. It follows the completion of milestone 1 related to the adoption of amendments to the Preschool and School Education Act, including secondary legislation, milestone 2 related to the adoption of a legislative package and an action plan to implement the strategic framework setting out the priorities for the development of the Bulgarian education system until 2030, and milestone 3 related to the adoption of an action plan containing the measures addressing the recommendations of the Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021-2030).

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.
2	Decree No. 80 of 25 March 2024 (published in State Gazette No 27 of 29 March 2024)	Copy of the publication in the State Gazette of the Act amending and supplementing the Vocational Education and Training Act. Decree No. 80 of 25 March 2024 of the President of the Republic of Bulgaria provides for the publication of the Act amending and supplementing the Vocational Education and Training Act in the State Gazette. Link to publication in State Gazette No 27 of 29 March 2024: https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=209844
3	Order № РД09-2230/09.08.2024 issued by the	The updated List of Professions for VET (LPVET) approved by order of the Minister of Education and Science.

	Minister of Education and Science, which entered into force on 12 August 2024.	
4	Table with 250 legal acts issued	A spreadsheet of all 250 legal acts in relation state educational standards, plans, and programmes for acquiring professional qualification
5	60 sampled legal acts	State educational standards issued by the Minister of Education and Science, plans signed by the Minister of Education and Science, and programmes signed by the Minister of Education and Science.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Entry into force of legal act(s) in the field of vocational education and training.

The Bulgarian Parliament adopted the Act amending and supplementing the Vocational Education and Training Act, Decree No. 80 of 25 March 2024, (hereinafter referred to as "VET Act Amendment") on 14 March 2024, which was published in the State Gazette No. 27 on 29 March 2024 and which entered into force three days after their publication in the State Gazette in line with Article 5(5) of the Constitution, that is on 1 April 2024 (evidence no. 2).

The legal act(s) shall provide for:

- approval of the list of professions for vocational education and training (VET);

Provision 1 of the VET Act Amendment (evidence no. 2) amends Art. 5, paragraph 2 of the VET Act, so that Vocational training ensures the acquisition of a qualification in a profession, in a part of a profession, including its updating or upgrading to a higher level of professional qualification, as well as the attainment of individual units of learning outcomes included in the State educational standard for the acquisition of a professional qualification with a view to their accumulation or transfer in the process of acquiring a qualification in the profession and facilitating access to the labour market.

Provision 2 of the VET Act Amendment amends Art. 6 in order to change the structure of the List of Vocational Education and Training Professions (hereinafter referred to as "LPVET") by deleting the specialties. The previous LPVET contained 588 specialties, grouped into 245 professions and 47 professional areas. Each of these specialties required training and examination programmes, which according to the motives for the draft amendment to the VET Act resulted in fragmented and overlapping content. The new LPVET consist only of professions with different levels of professional qualifications with their correspondence to the EQF and NQF, eliminating the concept of "specialities".

Provision 58 of the transitional and final provisions of the VET Act Amendment sets out a deadline that within three months of the entry into force of this Act, the Minister of Education and Science shall approve a new LPVET.

Following public consultations and consultations with ministries, the new LPVET was approved by Order № РД09-2230/09.08.2024 issued by the Minister of Education and Science (evidence no. 3) which entered into force on 12 August 2024 as per art.5(5) of the Bulgarian Constitution.

- approval of at least a total of 250 of the following: state educational standards, plans, programmes for acquiring professional qualification;

Following the selection of a random sample of 60 units, Bulgaria submitted a list of 250 legal acts (evidence no. 4) containing 66 ordinances for approval of state educational standards issued by the Minister of Education and Science, 120 orders for approval of curriculum plans signed by the Minister of Education and Science, and 64 orders for examination programmes for acquiring professional qualification that have been signed by the Minister of Education and Science. The evidence provided that 60 units confirmed that the requirements of the milestone have been met. The Commission assessed copies of 60 legal acts (evidence no. 5), which contain detailed information about the acquisition of professional qualifications covered by them.

- expansion of the role of employers in the amendment of the list of professions for VET;

Provision 45 of the VET Act Amendment (evidence no. 2) amends Art. 56, point 1, so that employers' organisations shall draw up proposals for the inclusion of new professions for VET, the deletion and amendment of existing professions in the LPVET and participate in its development, coordination and updating. The inclusion of the possibility to delete and amend existing professions are new provisions compared to the previous version of the legislation. As they come on top of the existing competences of employers' organisations, these provisions expand their role in the process of amendment of the list of professions for VET.

The amendment expands the role of employers in the amendment of the LPVET by strengthening the involvement of employers' organisations in the process. This involvement constitutes employer participation, since under Article 35 of the Labour Code, national representativeness status is granted only to employers' organisations that meet certain quantitative and structural criteria. These criteria ensure that such organisations are representative bodies reflecting a substantial and broadly distributed part of organised employer interests in Bulgaria. Their enhanced role therefore expands the role of employers in the amendment of the list of professions for VET.

- online training offers.

Provision 16 of the VET Act Amendment (evidence no. 2) amends Art. 17, paragraph 4 and 5, presenting new opportunities for online training offers for adults above 16 years. In particular, paragraph 4 provides that training in vocational training subjects concerning theoretical aspects of the profession may be organised in an electronic environment. Moreover, paragraph 5 provides that where, due to exceptional circumstances, the training process attended at institutions providing vocational training to persons aged 16 or over is suspended, following an order by the director of the institution, the training of those enrolled in daily, evening, part-time and individual training and in a dual training system shall be provided, as far as possible, in an electronic environment.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 49 Budget execution - transfer of at least EUR 12.59 million for digitalisation

Related Measure: C3.I2 Economic transformation programme

Quantitative Indicator: EUR million

Baseline: 0

Target: 12.59

Time: Q4 2025

1. Context:

The objective of the investment 2.1.d is to provide grants to SMEs for digitalisation. The investment consists of a grant scheme for the implementation of projects by SMEs.

Target 49 consists of a transfer of at least EUR 12.59 million to recipients for digitalisation.

Target 49 is the second and last target of investment 2.1.d, and it follows the completion of milestone 48 related to approval of a list of projects for funding.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the target (including all the consecutive elements) was satisfactorily fulfilled.
2	A spreadsheet with payments made during the period 2023–2025 to final recipients	The spreadsheet is an automated extraction from the Ministry of Innovation and Growth's accounting system.
3	Letters of completion for each of the completed projects issued by the Ministry of Innovation and Growth	The letters include the results of the checks carried out by the Ministry in compliance with the applicable management and control systems.
4	Application package for procedure BG-RRP-3.005 "Solutions in the field of information and communication technologies and cyber security in small and medium-sized	The application package includes the Guidelines for Applicants, which outline the rules for eligibility of applicants and their projects.

	enterprises", including the Guidelines for Applicants and annexes (published on 31 August 2022)	

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the target.

Transfer of at least EUR 12.59 million to recipients for digitalisation.

The Council Implementing Decision required the transfer of at least EUR 12.59 million to recipients for digitalisation. Bulgaria provided the extract from the accounting system (evidence no.2) according to which the total sum of all payments to recipients for projects for digitalization under the procedure BG-RRP-3.005 "Information and communication technology solutions and cyber security in small and medium-sized enterprises" amounted to EUR 12 543 819. Whilst this constitutes a minimal numerical deviation of 0.4% from the requirement of the Council Implementing Decision, the overall objective of this target is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

The Bulgarian authorities submitted an automated extraction from the Ministry of Innovation and Growth's accounting system (evidence no.2), showing that the total amount disbursed by the Ministry to the recipients of the grant scheme implemented through procedure BG-RRP-3.005 "Solutions in the field of information and communication technologies and cyber security in small and medium-sized enterprises" amounts to BGN 24 533 668, which with the official exchange rate of 0.51129 amounts to approximately EUR 12 543 819. The extract consists of a spreadsheet containing information on payments made to recipients of the grant scheme during the period 2023–2025 and includes, for each transaction, the document number (used as the unique identifier), the date of the document, the name of the recipient, the disbursed amount in local currency (BGN), and the unique number of the procedure launched by the Ministry of Innovation and Growth for the call, namely BG-RRP-3.005 "Solutions in the field of information and communication technologies and cyber security in small and medium-sized enterprises" as specified in the Guidelines for Applicants.

Following the selection of a random sample of 60 units, the Commission services conducted an on-the-spot check on 28 April 2026 to verify on the Ministry of Innovation and Growth's accounting system that the disbursed amounts in local currency (BGN) for all the 60 sampled units matched the corresponding amounts recorded in the automated extraction provided by the Bulgarian authorities. This check was completed successfully, confirming that the requirement of the milestone on the transfer of at least EUR 12.59 million to recipients for digitalisation has been met.

Furthermore, in line with the description of the measure, **the investment consists of a grant scheme for the implementation of projects by SMEs.**

The grant scheme for the implementation of projects related to technological modernisation BG-RRP-3.005 "Solutions in the field of information and communication technologies and cyber security in small and medium-sized enterprises" was launched by means of a competitive selection of

projects pursuant to Article 3, paragraph 2, item 1 of the Council of Ministers Resolution No. 114/2022 of 8 June 2022, laying out the rules for provision of funds to SMEs from the Recovery and Resilience Facility, with a deadline for application of 19 December 2022.

The Bulgarian authorities have provided Guidelines for Applicants (evidence no.4), which were published on 31 August 2022 on the Ministry of Innovation and Growth's website and in the Information System for the Management and Monitoring of EU Funds in Bulgaria (EUMIS 2020). According to section 5 of the Guidelines for Applicants (evidence no. 4), the objective of the procedure was to "contribute to accelerating the transition towards digitalisation of the economy by providing grants for the deployment of information and communication technologies and solutions ensuring an increased level of digitalisation of small and medium-sized enterprises".

Section 11 of the Guidelines for Applicants (evidence no. 4) specifies the eligibility criteria for applicants under the procedure BG-RRP-3.005 "Solutions in the field of information and communication technologies and cyber security in small and medium-sized enterprises" stating that eligible applicants must be micro, small and medium-sized enterprises within the meaning of Articles 3 and 4 of the Small and Medium-sized Enterprises Act and Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises (OJ L 124, 20.5. 2003).

Section 13.1, Point 2, "Activities Eligible for Funding" of the Guidelines for Applicants (evidence no. 4) specifies that eligible activities under the investment consist in three groups of activities, including ICT services and solutions i) for digital marketing, platforms, websites and mobile applications; ii) to optimise management, production and logistics; iii) to ensure cybersecurity in enterprises.

Furthermore, the authorities also provided Annex 12 to the Guidelines for Applicants (evidence no. 4) which provides a list of specific activities eligible for funding under the three groups of activities stated above.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Target: 60 Companies supported

Related Measure: C3.I2 Economic transformation programme

Quantitative Indicator: Number

Baseline: 0

Target: 240

Time: Q4 2025

1. Context:

The objective of this investment is to provide grants for SMEs and large companies in the NACE sector C for the introduction of circular economy production methods.

The investment consists of a grant scheme for the implementation of projects in the area of circular economy.

Milestone 60 relates to companies supported in the area of circular economy.

Milestone 60 is the last milestone related to investment 2.2c, and it follows milestone 59 related to the publication of approved projects.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the target (including all the consecutive elements) was satisfactorily fulfilled.
2	A spreadsheet with payments made during the period 2024–2025 to final recipients	The spreadsheet is an automated extraction from the Ministry of Innovation and Growth's accounting system.
3	Letters of completion for each of the completed projects issued by the Ministry of Innovation and Growth during the period 2024-2025	The letters include the results of the checks carried out by the Ministry in compliance with the applicable management and control systems.
4	A spreadsheet with a list of completed projects	The spreadsheet includes a list of all projects completed and for each project a unique identifier.
5	Guidelines for applicants, Rules for Condition for the Execution of the	Annex 1 includes the full documentation of the procedure that sets out the eligibility criteria for compliance of the applicants, the activities and

	investments and relevant Annexes	the costs, as well as a description of the selection procedure and the rules for implementing the awarded projects.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the target.

Companies supported in the area of circular economy.

The Bulgarian authorities submitted an automated extraction from the National Information System for the Recovery and Resilience Facility (UMIS2020) (evidence no.2). *According to the evidence provided, Bulgaria indicated that 253* companies have received final payments for support in the area of circular economy through procedure BG-RRP-3.008 "*Supporting the transition to a circular economy in enterprises*", *thus exceeding the goal of Target 60 by 13 companies supported.*

The extraction (evidence no. 2) consists of a spreadsheet containing multiple payments made to each recipient during the period 2024–2025 and includes, for each transaction, the document number, date of document, name of recipient, disbursed amount in local currency (BGN) and the unique number of the procedure launched by the Ministry of Innovation and Growth for the call, namely BG-RRP-3.008 "Supporting the transition to a circular economy in enterprises" as specified in the Guidelines for Applicants (evidence no. 5).

Following the selection of a random sample of 60 units, the Commission services conducted an on-the-spot check on 28 April 2026 to verify on the Ministry of Innovation and Growth's accounting system that the disbursed amounts in local currency (BGN) and the number of the procedure recorded for all the 60 sampled units matched the corresponding entries in the automated extraction provided by the Bulgarian authorities. This check was completed successfully, confirming that the requirement of the milestone on 240 companies being supported in the area of circular economy has been met.

Furthermore, with regard to verifying the eligibility status of the beneficiaries as companies, the Commission services cross-checked the sample of 60 selected companies against the official commercial register database on 22 May 2026, identifying corresponding legal entries in each instance.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 65 Contract and operating rules

Related Measure: C4.R1 Establishment of a National Fund for Decarbonisation

Qualitative Indicator: Contract signed and operating rules adopted

Time: Q4 2025

1. Context:

The objective of this reform is to establish the National Fund for Decarbonisation (NDF). The measure consists in an assessment of the national energy efficiency regulatory framework and in the entry into force of legal act(s) establishing the NDF.

Milestone 65 requires the signature of contract between the Management Board of the NDF and the selected Fund Manager following an open selection procedure. Furthermore, it requires the adoption of the operating rules of the Fund by the Management Board of the NDF.

Milestone 65 is the third and last milestone of the reform. It follows the completion of milestone 63, related to an assessment of the national energy efficiency regulatory framework and milestone 64 related to the entry into force of legal act(s) for the establishment of the NDF.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements) was satisfactorily fulfilled.
2	Contract between the Management Board of the National Decarbonisation Fund and the selected Fund Manager Alliance for the Decarbonisation of Bulgaria, signed 4 June 2026	Contract between the Management Board of the NDF and the selected Fund Manager Alliance for the Decarbonisation of Bulgaria
3	Operating rules of the National Decarbonisation Fund, adopted by the General Assembly of Donors on 12 May 2026	Operating rules for the NDF, available on the website of the NDF: https://www.bgeef.com/bg/2026/04/22/pokana-za-uchastie-v-konkurs-za-izbor-na-2/
4	Documentation to hold an open tender for the selection of the Managing Director of the National Decarbonisation Fund	Documentation for the selection of the NDF manager, available on the website of the NDF: https://www.bgeef.com/bg/2026/04/22/pokana-za-uchastie-v-konkurs-za-izbor-na-2/
5	Call for application in an open tender for the selection of the Manager of the National Decarbonisation Fund, published on the website of the Fund on 22 April 2026	Call for participation in a competition for the selection of the first manager of the NDF, available on the website of the NDF: https://www.bgeef.com/bg/2026/04/22/pokana-za-uchastie-v-konkurs-za-izbor-na-2/
6	Protocol No. 2/12.5.2026 from	Protocol from the meeting of the General

	the extraordinary meeting of the National Decarbonisation Fund Donors General Assembly	Assembly of Donors of the NDF held on 12 May 2026, electronically signed by the represented donors with voting rights and the Chairman of the Board of Directors of the Fund
7	Energy Efficiency Act promulgated in State Gazette No. 35/2015, effective of 15 May 2015, amended in State Gazette 97/2025 effective of 14 November 2025	Act regulating the public relations related to the implementation of the state policy for increasing energy efficiency (Article 1 (1) Energy Efficiency Act) available under: https://lex.bg/bg/laws/ldoc/2136500695

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

The contract between the Management Board of the National Fund for Decarbonisation and the selected Fund Manager shall be signed, following an open selection procedure.

The contract between the Management Board of the National Fund for Decarbonisation (hereinafter referred to as "the Management Board") and the selected Fund Manager Alliance for the Decarbonisation of Bulgaria (hereinafter referred to as: "the Fund Manager") (evidence no. 2) was signed on 4 June 2026.

The Fund Manager has been selected following an open selection procedure. This is reflected in the Operating Rules of the National Fund for Decarbonisation (hereinafter referred to as: "the operating rules of the Fund") (evidence no. 3) and the documentation to hold a competition for the selection of the Managing Director of the National Fund for Decarbonisation (hereinafter referred to as: "the documentation for the selection of the Fund manager") (evidence no. 4).

The selection procedure was based on an open call for applications. The documentation for the selection of the Fund manager (evidence 4) and the operating rules of the Fund (evidence no. 3) were made publicly available on 22 April 2026 on the website of the National Fund for Decarbonisation (evidence no. 5). The documents (evidence no. 3 and no. 4) were publicly accessible during and after the selection procedure which was open for a period of 30 days from 22 April 2026 to 22 May 2026.

The Commission services accessed the link to the call for participation on the website of the National Decarbonisation Fund provided by the Bulgarian authorities (evidence no. 5) on 21 May 2026 and on 27 May 2026 to verify that the documents (evidence no. 3 and no. 4) were publicly accessible during and after the selection procedure. These checks were completed successfully, confirming that the documents (evidence no. 3 and no. 4) were publicly accessible during and after the selection procedure.

The application was open to all Bulgarian or foreign legal entities or their groupings with minimum professional requirements to ensure the capability to manage the Fund, as set out in the documentation for the selection of the Fund manager (evidence no. 4, pages 7 – 10).

As part of the selection process, applicants submitted a technical proposal as well as a financial offer (evidence no. 3, pages 36 - 37). The technical proposal and the financial offer were scored based on

predefined criteria and a methodology detailed in the publicly available documentation for the selection of the Fund manager (evidence no. 4, pages 18 – 31). This scoring forms the basis for the selection of the Fund Manager (evidence no. 4, page 31).

Furthermore, the Management Board of the National Decarbonisation Fund shall adopt the operating rules of the Fund, [...]:

The General Assembly of Donors adopted the operating rules of the Fund on 12 May 2026 as evidenced in Protocol No. 2/12.5.2026 from the extraordinary meeting of the National Decarbonisation Fund Donors General Assembly (evidence no. 6, page 2) in accordance with Article 84 (2) sub-paragraph 2. of the Energy Efficiency Act (evidence no. 7).

The Council Implementing Decision required the operating rules of the Fund to be adopted by the Management Board of the National Decarbonisation Fund. However, the Bulgarian legislation, notably the Energy Efficiency Act promulgated in State Gazette No. 35/2015, effective of 15 May 2015, amended in State Gazette 97/2025 effective of 14 November 2025 (hereinafter referred to as "Energy Efficiency Act", evidence no. 7), which represents the legal basis for the establishment of the Fund, sets out that the operating rules of the Fund are adopted by the General Assembly of Donors in Article 84 (2) sub-paragraph 2. Article 84 (2) of the Energy Efficiency Act defines the competencies of the General Assembly of Donors, including adopting the operating rules of the Fund. The entry into force of the Energy Efficiency Act has been assessed under milestone 64. The adoption of the operating rules of the Fund is achieved in line with the Energy Efficiency Act. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the adoption of the operating rules of the Fund by the General Assembly of Donors is achieved in accordance with the Energy Efficiency Act and does not impact the legal value of the adoption of the operating rules which determine the spending of the resources of the Fund under Art. 82 (4) of the Energy Efficiency Act. As of this, this minimal deviation does not affect the progress towards achieving the reform that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

[...] which shall:

(i) include the investment strategy, eligible beneficiaries, and types of instruments;
The **investment strategy** of the Fund is outlined in section 1 of the operating rules of the Fund (evidence no. 3, pages 4 – 24). The strategy sets the objective of decarbonising the building stock through the Fund (evidence no. 3, page 6). To this end, the Fund is tasked with implementing a market-based and step-by-step investment strategy structured around three pillars: programme awareness and capacity building, technical assistance and financial products (evidence no. 3, page 8).

Eligible beneficiaries are indicated in section 11 of the operating rules of the Fund (evidence no. 3, pages 67 - 68). They consist of four specific types of eligible beneficiaries: public buildings, residential buildings comprising both individual residential buildings (buildings falling outside the scope of the Condominium Ownership Management Act), multi-family houses (buildings falling under the Condominium Ownership Management Act), and commercial buildings.

The **types of instruments** provided by the Fund are described in section 12 of the operating rules of the Fund and include a mix of stand-alone and combined support mechanisms (evidence no. 3, pages 69 - 70). This includes financial instruments (for instance, loans or guarantees) and direct grants.

(ii) include details on leverage, sources of funding including private funds, implementation arrangements, financial products, and risk policy.
Details on the target **leverage** of the Fund are set out in section 12.2.2 of the operating rules of the Fund. The Fund Manager sets and monitors clear targets for leverage and capital mobilisation (evidence no. 3, page 70). To this end, the operating rules of the Fund define an overall target leverage, leverage targets by type of instrument, annual reporting on leverage and corrective actions if the targets are not met (evidence no. 3, page 71).

Details on the **sources of funding** of the Fund are outlined in section 2.1 of the operating rules of the Fund. According to evidence 3, page 25, the Fund will be capitalised through a mix of public and **private funding sources**, such as funds from the Bulgarian state budget or EU funding programmes, loans from banks, donations by Bulgarian and foreign natural and legal persons, etc.

Details on the **implementation arrangements** of the Fund are outlined in section 3.1.3 of the operating rules of the Fund. The Fund provides its financial resources through a flexible and non-exclusive delivery model that allows the use of different implementation channels depending on market conditions, the characteristics of financial products and target groups (evidence no. 3, page 29). Funding operations can be provided through financial intermediaries such as banks, direct financing from the Fund via the Fund Manager to final recipients, Energy Services Companies acting as integrated financing partners and implementation in the framework of Energy Efficiency Contracts structures. Technical assistance for project development is provided by a network of one-stop shops.

Details on **financial products** are indicated in section 4 of the operating rules of the Fund (evidence no. 3, pages 52 – 58). These shall be designed and implemented by the Fund Manager. Products shall combine grants, loans and technical assistance and address specific needs of the sectors. Furthermore, they shall be performance-driven and should aim to catalyse private investment.

The **policy on risk management** is described in section 5 of the operating rules of the Fund (evidence no. 3, pages 59 – 62). It establishes a structured framework for the identification, assessment, mitigation, monitoring and control of risk, as well as for the detection and recording of irregularities. It also defines the roles and responsibilities of the relevant bodies, including the Programme Coordinator, the Risk Management Group and the Governing Council.

4. Commission Preliminary Assessment: satisfactorily fulfilled

Number and name of the Target: 78 Payment(s) for solar domestic hot water or photovoltaic systems

Related Measure: C4.I2 Support for renewable energy for households

Quantitative Indicator: Number

Baseline: 0

Target: 1 420

Time: Q4 2025

1. Context:

The objective of the measure is to increase the use of renewable energy in final energy consumption by households. The measure consists in support for solar systems for domestic hot water supply or photovoltaic systems.

The target requires proof(s) of payment(s) for at least 1 420 solar domestic hot water or photovoltaic systems.

Target 78 is the second and last milestone or target of the investment, and it follows the completion of milestone 76, related to the establishment of a national renewable energy support scheme for households.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the target (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	*evidence-1-otcet-c4-i2-69fdacb1e10e4.xlsx*	Excel table containing a list of 1 368 proofs of payment for a solar domestic hot water system or a photovoltaic system with a unique identifier.
3	*evidence-2-extract-report-1368-69fdacb217ea3.pdf*	Extract from a bank account of the Ministry of Energy. The extract contains 1368 proofs of final payment, showing the beneficiary's bank account number, payment amount, payment status, beneficiary name, and unique identifier.
4	*60 financing contracts*	Financing contracts providing grants to homeowners for the purchase of a solar domestic hot water system or a photovoltaic

		system, showing the beneficiary's name, the Ministry of Energy acting as the Monitoring and Reporting Structure (СНД) as grant-awarding body, the maximum grant amount, and a unique identifier.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the target.

Proof(s) of payment(s) for at least 1 420 solar domestic hot water or photovoltaic systems.

Bulgaria submitted a list of 1 368 proofs of payment for solar domestic hot water and photovoltaic systems (evidence no. 2). Following the selection of a random sample of 60 units, Bulgaria submitted proofs of payment (evidence no. 3) and financing contracts (evidence no. 4) that together cover the purchase of a solar domestic hot water system or a photovoltaic system.

All proofs of payment include a unique identifier linking them to the corresponding financing contract. The 60 financing contracts reviewed are standard contracts and contain a standard provision identifying whether the supported system is a solar domestic hot water or a photovoltaic system. Each proof of payment carries the same unique identifier as its corresponding contract, thereby linking the two documents. Proofs of payment further indicate the beneficiary's name, which matches the beneficiary’s name in the contract. In addition, proofs of payment include the payment amount and the successful payment status. This chain of documentation establishes that each payment corresponds to an eligible system. The evidence provided for a sample of 60 units confirmed that the requirement of the target has been met, and that payments took place for domestic hot water or photovoltaic systems.

The Council Implementing Decision required proof(s) of payment(s) for at least 1 420 solar domestic hot water or photovoltaic systems. Bulgaria has submitted a list of 1 368 proofs of payments for eligible systems, 20 of which represent solar domestic hot water systems and 1 348 solar photovoltaic systems. Whilst this constitutes a minimal numerical deviation of 3.66% from the requirement of the Council Implementing Decision, the overall objective of this target is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 93 Conditions for a new state-owned holding company

Related Measure: C4.R11 Improving corporate governance of state-owned companies in the energy sector

Qualitative Indicator: Adoption of a Council of Ministers decision

Time: Q4 2025

1. Context:

The objective of the reform is to increase the transparency and competitiveness of state-owned companies in the energy sector. The measure consists in the separation of coal-related undertakings from the Bulgarian Energy Holding.

Milestone 93 requires the adoption of a Council of Ministers decision authorising the Minister of Energy to work on a resolution concerning the corporate restructuring of the Bulgarian Energy Holding. It further provides that the decision shall require that (i) a new state-owned enterprise shall be established, to be set up as a holding company, which shall be the sole owner of coal-related undertakings previously owned by the Bulgarian Energy Holding; and (ii) an auditor shall evaluate the assets to be transferred.

Milestone 93 is the first milestone of the reform. It will be followed by milestone 93a, related to the set-up and registration in the commercial register of a new state-owned enterprise as a holding company, which would be the sole owner of coal-related undertakings previously owned by the Bulgarian Energy Holding.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	Copy of Decision of the Council of Ministers No 443 of June 10, 2026 on authorising the Minister of Energy to work on relevant acts for the implementation of Reform C4.R11 “Improving corporate governance of state-owned enterprises in the energy sector” of the Bulgarian Recovery and Resilience Plan	Decision of the Council of Ministers (i) authorising the Minister of Energy to work on relevant acts concerning the corporate restructuring of the Bulgarian Energy Holding, (ii) mandating the establishment of a new state-owned enterprise, to be set -up as a holding company, which shall be the sole owner of coal-related

		undertakings previously owned by the Bulgarian Energy Holding, and (iii) establishing that an auditor shall evaluate the assets to be transferred.
3	Bulgarian Commercial Act https://lex.bg/laws/ldoc/-14917630	Commercial law
4	Regulations for the implementation of the Public Enterprises Act https://lex.bg/bg/laws/ldoc/2137202367	Legal act concerning the regulation of the participation of the Bulgarian State in public enterprises
5	Act of establishment of the Bulgarian Energy Holding https://portal.registryagency.bg/CR/en/Reports/ActiveConditionTabResult?uic=831373560	Public information on the shareholders of the Bulgarian Energy Holding in the commercial register

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

The Council of Minister shall adopt a decision authorising the Minister of Energy to work on a resolution concerning the corporate restructuring of the Bulgarian Energy Holding.

On 5 June 2026, the Council of Ministers adopted Decision No 443 (hereinafter, the "Council of Ministers Decision") (evidence no. 2). According to paragraph 1 of the Council of Ministers Decision, the Council of Ministers has decided to '*authorise the Minister of Energy to work on relevant acts concerning the corporate restructuring of the Bulgarian Energy Holding, for the implementation of reform C4.R11 "Improving corporate governance of state-owned enterprises in the energy sector" from Bulgaria's Recovery and Resilience Plan*'.

The Bulgarian legal framework does not require the publication on the State Gazette of decisions of the Council of Ministers (see Article 4(1), point 8 of the Law on the State Gazette). Council of Ministers' decisions, including the Decision No 443 on June 10, 2026, produce their effects as of their adoption date.

The Council Implementing Decision required that the Council of Minister shall adopt a decision authorising the Minister of Energy to work on a resolution concerning the corporate restructuring of the Bulgarian Energy Holding. The Council of Ministers adopted the Decision No. 443, which authorises the Minister of Energy to work on relevant acts concerning the corporate restructuring of the Bulgarian Energy Holding. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the corporate restructuring of the Bulgarian Energy Holding is a complex process where the Minister of Energy, in its role as representative of the Bulgarian state as the sole shareholder of Bulgarian Energy Holding EAD, as specified in the commercial register, Article 19 of the Act of establishment of the Bulgarian Energy Holding EAD (evidence 5), is required by the Bulgarian legislation to work on different acts concerning the corporate restructuring of the Bulgarian Energy Holding. These acts include a decision pursuant to Article 262 of the Commercial Act concerning the transformation of Bulgaria Energy Holding EAD

(evidence no. 3), by which the shareholders shall approve the transformation of Bulgarian Energy Holding EAD by separation, where in this case the sole shareholder is the Bulgarian State through the Minister of Energy as per the Act of Establishment of the Bulgarian Energy Holding. These acts also include a decision pursuant to Article 26, para. 1, item 2 of the Regulations for the Implementation of the Public Enterprises Act (evidence no. 4), by which the general meeting of shareholders, which in this case is the Bulgarian State through the Minister of Energy, shall approve amendments to the articles of association of the new state-owned holding company, sole owner of coal-related undertakings previously owned by the Bulgarian Energy Holding. The Decision 443 adopted by the Council of Ministers authorises the Minister of Energy to work on relevant acts concerning the corporate restructuring of Bulgarian Energy Holding EAD, which ensures compliance with the national legal framework applicable for this process. As of this, this minimal deviation does not affect the progress towards achieving the reform that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

The decision shall require that:
- A new state-owned enterprise shall be established, to be set-up as a holding company. It shall be the sole owner of coal-related undertakings previously owned by the Bulgarian Energy Holding;

According to paragraph 2 of the Council of Ministers Decision, the Council of Ministers has decided to '*establish, in accordance with regulatory requirements, a state-owned enterprise, to be set-up as a holding company, which shall be the sole owner of coal-related enterprises previously owned by Bulgarian Energy Holding EAD*'.

- An auditor shall evaluate the assets to be transferred.

According to paragraph 2 of the Council of Ministers Decision, the Council of Ministers has also decided that *'an auditor shall evaluate the assets to be transferred'.*

Conditions for a new state - owned holding company

The elements outlined in the Decision 443 of the Council of Ministers establish the conditions for a new state-owned holding company. This Decision prepares the establishment of a new state-owned holding company by authorising the Minister of Energy to work on the relevant acts concerning the corporate restructuring of the Bulgarian Energy Holding, which shall take the form of the establishment of a new state-owned enterprise, to be set-up as a holding company. The preparation of an audit report to evaluate the assets to be transferred is required under Article 262m of the Commercial act (evidence 3).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 106 Geothermal tool

Related Measure: C4.I7 Increasing the use of renewable energy from geothermal sources

Qualitative Indicator: Geothermal tool accessible online

Time: Q4 2025

1. Context:

The objective of the investment is to support the production of renewable energy from geothermal sources.
The investment consists in the entry into force of a revised regulatory framework for geothermal energy and a geothermal tool accessible online.

Milestone 106 concerns the launch of a tool accessible online that allows for the calculation of the levelized cost of geothermal heat based on geographic location and heat characteristic(s).

Milestone 106 is the second and last milestone of the investment, and it follows the completion of milestone 105, related to the entry into force of legal acts to remove key regulatory impediments, provide that there is no pollution of groundwater and water surfaces, and regulate the use of geothermal energy as a resource.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled
2	Geothermal Levelized Cost of Heat (LCOH) Assessment Tool published online	Online tool for the calculation of the LCOH and the economic LCOH of a geothermal project based on geographic location and heat characteristic(s), available in English at the following link: https://www.me.government.bg/geocalc/ https://www.me.government.bg/en/geocalc2 and in Bulgarian at the following link: https://www.me.government.bg/bg/geocalc2.
3	Report on Geothermal Energy for Energy Security in Bulgaria	Technical report (by the World Bank) providing inputs and recommendations to inform the selection of sites with good prospects for geothermal development, available at the following link in English: https://www.me.government.bg/uploads/manager/source/VOP/VEI/VEEEES/EN_Sites_identification_report_adjusted_post_MoE_comments.pdf ; and in Bulgarian:

		https://www.me.government.bg/uploads/manager/source/VOP/VEI/VEEEES/Deliverable_3_BG-compressed.pdf.
4	Annex B to the Report on Geothermal Energy for Energy Security in Bulgaria, "Selection of geothermal areas"	Annex to the Report on Geothermal Energy for Energy Security in Bulgaria (evidence no. 3) available at the following link in English: https://www.me.government.bg/uploads/manager/source/VOP/VEI/VEEEES/AnnexB_SelectionGeothermalAreas.pdf; and in Bulgarian: https://www.me.government.bg/uploads/manager/source/VOP/VEI/VEEEES/AnnexB_BG-compressed.pdf.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

The tool shall allow for the calculation of the levelized cost of geothermal heat

The Bulgarian authorities provided links to the webpage of the Geothermal Levelized Cost of Heat (hereinafter referred to as "LCOH") Assessment Tool in English and in Bulgarian language (evidence no. 2, hereinafter referred to as 'geothermal tool').

The geothermal tool allows for the calculation of the LCOH of a geothermal project. As stated on the front page of the geothermal tool, '*Geothermal LCOH is the average lifetime cost to produce one unit (MWh) of heat from a geothermal system, factoring in all initial drilling costs/capital costs (CAPEX), ongoing operational and maintenance costs (OPEX), and financing costs over the project's lifetime*'.

The calculation of the LCOH of geothermal heat through the geothermal tool follows six successive steps (hereinafter referred to as 'assessment steps'): (1) region (such as selection of geographical location of the project), (2) technical assumptions, including heat characteristics, (3) operational assumptions, (4) capital expenses and operational expenses (referred to in the geothermal tool as "CAPEX & OPEX"), (5) financial assumptions and (6) commodities and CO2. Where assumptions are predefined, these are mostly based on studies carried out under the project Energy Security in Bulgaria as indicated on the front page of the geothermal tool. These were provided under an Advisory Services Agreement with the International Bank for Reconstruction and Development (hereinafter referred to as "IBRD") and include the technical report (evidence no. 3) and its annex B (evidence no. 4).

The Commission services accessed the links to the webpages of both the English and the Bulgarian language version of the geothermal tool provided by the Bulgarian authorities and performed a test calculation of LCOH on 5 June 2026 to verify that the geothermal tool both in the English and the Bulgarian language version allows for the calculation of LCOH of a geothermal project and for the download of a report of this calculation. This check was completed successfully, confirming that the geothermal tool in both the English and the Bulgarian language version allows for the calculation of LCOH of a geothermal project and the download of a report of this calculation. In particular, users can download a report containing the calculated LCOH and economic LCOH results. The report also provides a comparison between the LCOH of geothermal heat – as calculated by the tool – and the LCOH of other technologies, namely natural gas, electrical heating and hard coal, including an adjustment for CO2 costs.

… based on geographic location

As a first assessment step, users select the geographical area for the geothermal project from a map or from a drop-down menu, between seven regions: Pleven, Varna, Vratsa, Sofia Basin, Velingrad, Struma Valley, and Erma Reka. These areas have been selected based on their geothermal potential as stated on the front page and in first assessment step. Evidence no. 3 and no. 4 further indicate that these areas were selected for their geothermal resources (evidence no. 3, p. 113 and evidence no. 4, p. 28 – 29) considering the currently available geothermal studies and information. The data on the availability of geothermal energy was obtained primarily from the database of the National Geological Fund (hereinafter referred to as "NGF") (evidence no. 3, p. 124).

The first assessment step of the tool specifies the relevance of the location for the purpose of the LCOH calculation: '*the location affects the geothermal potential, drilling costs, drilling depth and therefore the overall project conditions*'.

… **and heat characteristic(s).**

The second assessment step of the tool concerns '*Technical assumptions for geothermal projects and geothermal resources characteristics*'. This includes technical characteristics of the heat, such as the resource depth and resource temperature.

The tool automatically sets values based on the characteristics of the region selected under the first assessment step. Users can however modify wellhead temperature and drilling depth (vertical distance from the surface to the geothermal reservoir) to accommodate the specific project needs and expected reservoir performance, within a predefined range. These parameters affect factors of the LCOH calculation such as drilling costs as indicated on the front page of the geothermal tool.

The tool shall be accessible online.

The tool is accessible via the links referred to in evidence no. 2. Access to the geothermal tool is available free of charge, without access restrictions both in English and Bulgarian, ensuring that all interested stakeholders can utilize it. Furthermore, the technical report (evidence no. 3) and its annex B (evidence no. 4) containing the underlying assumptions of the geothermal tool have been made available on the website of the Bulgarian Energy Ministry in both English and Bulgarian.

The Commission services accessed the links to the webpages of both the English and the Bulgarian language version of the geothermal tool provided by the Bulgarian authorities on 5 June 2026 to verify that the tool is accessible online and allows for the calculation of the LOCH based on geographic location and heat characteristic(s). This check was completed successfully, confirming that both the English and the Bulgarian language version of the geothermal tool are accessible online and allow for the calculation of the LCOH based on geographic location and heat characteristic(s).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 136 Electronic agricultural information system

Related Measure: C6.I2 Digitalisation of processes from farm to fork

Qualitative indicator: Electronic agricultural information system accessible

Time: Q4 2025

1. Context:

The objective of the measure is to facilitate the automated data exchange between the administration and farmers. The measure consists in the electronic agricultural information system being accessible.

Milestone 136 requires that an acceptance-delivery protocol shall be issued, confirming that the electronic agricultural information system including the communication networks of field and rain sensors and four additional modules is accessible.

Milestone 136 is the first and final step of the implementation of the investment.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) was satisfactorily fulfilled
2	Acceptance-delivery protocol, signed on 16 December 2025	Acceptance-delivery protocol on the implementation of the activities under the contract 'Digitalisation of Farm to Fork Processes' signed by the contractor and the contracting authority on 16 December 2025
3	Acceptance-delivery protocol, signed on 16 March 2026	Acceptance-delivery protocol on the implementation of the activities under the contract 'Digitalisation of Farm to Fork Processes' signed by the contractor and the contracting authority confirming that, as of the date of signature of the acceptance-delivery protocol of 16 December 2025 approving the final report on the implementation of the activities of a project with subject "Digitalisation of Farm-to-Fork Processes" under Contract № RD51 - 40/05.07.2024, the Electronic Information System in Agriculture, including the communication network of field and rain sensors and four additional modules, is accessible
4	Contract for the „Digitalization of processes	Signed contract, Ref. RD51-40/05.07.2024, between the Ministry of Agriculture and Food and AB GROUP DZZD on the

	from farm to fork“ signed 05 July 2024	“Digitalization of processes from farm to fork”
5	Link to the electronic agricultural information system	Link to the electronic agricultural information system (A common platform for uniting all modules and integrating existing information systems through interfaces) https://www.mzh.government.bg/bg/ministerstvo/aktualno/ot-fermata-do-trapezata/, including links to the following modules: Module 1 - Module for the use of plant protection products and fertilizers https://prz.mzh.government.bg Module 2 - Information and analytical module for control and use of antimicrobials veterinary medicinal products (VMPs) https://vlp.mzh.government.bg Module 3 - Farm to fork tracking module https://f2f.mzh.government.bg Module 4 - Online training module: https://edu.mzh.government.bg Module 5 - Software platform (data management module) for visualization of data from the communication network of field and rain sensors: https://sensors.mzh.government.bg
6	On-the-spot check carried out on 11 February 2026	On-the-spot check to verify that the electronic agricultural information system including the communication network of field and rain sensors and four additional modules is accessible

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Acceptance-delivery protocol shall be issued, confirming that the electronic agricultural information system, including the communication network of field and rain sensors and four additional modules is accessible. Furthermore, in line with the description of the measure, **the measure consists in the electronic agricultural information system being accessible.**

The contract Ref.RD51-40/05.07.2024 on the “Digitalization of processes from farm to fork”, including the specifications on the electronic agricultural information system, covering the software platform (so-called data management module) related to the visualization of data from the communication network of field and rain sensors and the additional modules was signed between the Ministry of Agriculture and Food and AB GROUP DZZD on 5 July 2024 (evidence no. 4). The acceptance-delivery protocol on the implementation of the activities under the contract was signed by the contractor and the contracting authority on 16 December 2025, certifying that the Ministry of Agriculture and Food accepts without objection the implementation of all activities related to the development of the electronic agricultural information system (evidence no.2 and no.4). The supplementing acceptance-delivery protocol on the

implementation of the activities under the contract was signed by the contractor and the contracting authority on 16 March 2026, confirming that, as of the date of signature of the acceptance-delivery protocol of 16 December 2025, the electronic agricultural information system, including the communication network of field and rain sensors and four modules, is accessible (evidence no.3). The four additional modules relate to Module 1 - Module for the use of plant protection products and fertilizers; Module 2 - Information and analytical module for control and use of antimicrobials veterinary medicinal products (VMPs); Module 3 - Farm to fork tracking module and Module 4 - Online training module (evidence no. 4 and no.5). Moreover, the authorities provided the link to the electronic agricultural information system, including all relevant links to the modules (evidence no.5).

The Commission services accessed the links provided by the authorities on 10 February 2026 to verify that the electronic agricultural information system is accessible. For the software platform (so-called data management module) related to the visualization of data from the communication network of field and rain sensors as well as the four additional modules, where accessibility could only be confirmed after logging in with an internal account. The Commission services conducted an on-the-spot check on 11 February 2026 to verify their accessibility (evidence no.6). The check was completed successfully, confirming that the electronic agricultural information system including the communication network of field and rain sensors and four additional modules is accessible.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 163 Measures on transport

Related Measure: C8.R1 Strategic transport framework

Qualitative Indicator: Measures by the Ministry of Transport and Communications taken

Time: Q4 2025

1. Context:

The objective of the reform is to increase the sustainability of transport in Bulgaria. The reform consists in the entry into force of a national plan, the publication of a market assessment, and the signature of new public service contract(s) for the provision of public rail transport services.

Milestone 163 concerns measures taken by the Ministry of Transport and Communication (hereinafter referred to as "MTC"). It includes the approval of an action plan with milestones, timeline and performance indicators, the approval of the creation of a joint coordination working group(s) between the MTC and the National Railway Infrastructure Company (NRIC), and the approval of the creation of a database to track progress of project implementation.

Milestone 163 is the fourth milestone of the reform, and it follows the completion of milestone 161 related to the entry into force of the National Plan for the Development of Combined Transport in Bulgaria, milestone 162 related to an independent audit on the capacity to manage and implement TEN-T railways projects and milestone 164 related to a market assessment on the scope of public service obligation. It is accompanied in this payment request by milestone 165, related to the signature of the public service contract(s).

2. Evidence provided:

	Name of the evidence.	Short description
1	Cover note	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled
2	Action Plan signed and approved by the Minister of Transport and Communications on 26 March 2026 (reference number 14-00-324/26.03.2026)	Action Plan on measures to strengthen the capacity of the National Railway Infrastructure Company and the Ministry of Transport and Communications to manage railway projects on the trans-European transport network containing milestones, timeline and performance indicators.
3	Order of The Minister of Transport and Communications signed by	Order creating a joint coordination working group between the National Railway Infrastructure Company and the Ministry of

	the Minister and adopted on 26 March 2026 (reference number РД-08-153/26.03.2026)	Transport and Communications on project planning and reporting.
4	Order of The Minister of Transport and Communications signed by the Minister and adopted on 26 March 2026 (reference number РД-08-152/26.03.2026)	Order for the establishment of a database to track the progress of the implementation of the TEN-T railway infrastructure projects.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

The Ministry of Transport and Communications (MTC) shall approve:

(i) an action plan with milestones, timeline and performance indicators on the capacity of the National Railway Infrastructure Company (NRIC) and MTC to manage TEN-T projects;

The MTC has approved on 26 March 2026 the Action Plan on measures to strengthen the capacity of the National Railway Infrastructure Company (hereinafter referred to as "NRIC") and MTC to manage railway projects on the trans-European transport network (hereinafter referred to as "TEN-T") (hereinafter referred to as 'Action Plan', evidence No. 2). The approval is evidenced by the signature on the action plan, under reference number 14-00-324. The Action Plan sets out concrete milestones with specific timelines, responsible bodies, and measurable performance indicators, thereby providing a structured framework for the implementation and monitoring of the actions included in it. One example of a milestone with timeline and performance indicators is action 5: the approval of detailed route directions of the sections of the main TEN-T in Bulgaria; timeline: December 2026; performance indicator: detailed spatial plans (SPPs)/building plans (PPs) approved by the Minister of Regional Development and Public Works in accordance with the Spatial Planning Act, defining the route of the section of the main TEN-T in Bulgaria. Another example is action 6: a needs assessment for TEN-T rail investments; timeline: December 2026 and updated annually; performance indicator: assessment and prioritisation of investment needs for rail sections of the core TEN-T, in line with the objectives, priorities and requirements of Regulation (EU) 2024/1679.

As shown by the examples, the milestones with their timelines and performance indicators support the management of TEN-T projects by enhancing coordination, monitoring, and reporting (Actions 1-4), enhancing investment assessment and prioritisation (Action 6), and establishing measurable objectives to track project progress (Actions 5 and 7). They also contribute to improving relevant NRIC processes (Actions 8 and 9) and to identifying concrete measures to develop the administrative capacity of NRIC and MTC in support of achieving these objectives (Action 10).

(ii) the creation of a joint coordination working group(s) between the MTC and the NRIC on project planning and reporting;

The MTC adopted on 26 March 2026 the order No. РД-08-153 (evidence No. 3). Under point I, the order establishes a joint coordination working group between the Ministry and the NRIC on project planning and reporting (evidence No. 3). The order No. РД-08-153 defines the composition of the

group, bringing together senior representatives from MTC, NRIC and other authorities such as the Ministry of Regional Development and Public Works and the Ministry of Finance (evidence No. 3, Point I). It also clearly sets out its mandate to coordinate project planning, provide methodological support, and monitor and report on the implementation of TEN-T railway projects (evidence No. 3, Point II). Furthermore, the order mentions that the working group is tasked with producing annual reports (by the end of February of each year) to the Minister on progress, risks, and implementation of the action plan, ensuring structured reporting and continuous oversight of TEN-T project delivery (evidence No. 3, Point IV).

(iii) the creation of a database to track progress of the implementation of the TENT-T railway infrastructure projects.

The MTC adopted on 26 March 2026 the order No. РД-08-152 (evidence No. 4). Under point I, the order approves the creation of a database for TEN-T railway infrastructure projects (evidence No. 4).

The order No. РД-08-152 approves the creation of a new centralised cloud-based database under the name 'TEN-T railway infrastructure projects') as the main tool for data storage and sharing (evidence No.4, Point I). Access rights and responsibilities for maintaining and updating information in the database are further specified (evidence No.4, Point II), assigning the roles to the relevant directorates of the Ministry of Transport and Communications and to the National Railway Infrastructure Company. In addition, the order defines detailed reporting requirements (evidence No.4, Point III), including the scope of information to be provided relating to project progress, financial data, risks, timelines and forecasts, as well as deadlines for regular updates, for instance quarterly reporting obligations. It also requires that the relevant information is updated by the fifth day of the month following the relevant quarter (evidence No.4, Point III). Through these features, the database allows for the tracking of progress of the implementation of the TEN-T railway infrastructure projects.

4. Commission Preliminary Assessment: Satisfactory fulfilled.

Number and name of the Milestone: 165 New public service contract(s) (PSC) for public rail transport services

Related Measure: C8.R1 Strategic transport framework

Qualitative Indicator: Signature of contract(s)

Time: Q4 2025

1. Context:

The reform aims to increase the sustainability of transport in Bulgaria. It consists in the entry into force of a national plan, the publication of a market assessment and the signature of a new public service contract for the provision of public rail transport services.

Milestone 165 requires the signature of new public service contract(s) for the provision of public transport services by rail in Bulgaria. The new public service contract(s) shall provide for its/their entry into force no later than 13 December 2026 and be signed following a tender procedure divided into multiple lots. The milestone also requires that the contract(s) set out rules for access to rolling stock and obligations on operators to return assets in line with normal depreciation. Finally, the contract(s) shall ensure that public financing of rolling stock is taken into account in the calculation of compensation to operators.

Milestone 165 is the fifth and last milestone of the reform. It follows the completion of milestone 161 related to the entry into force of a National Plan for the Development of Combined Transport, milestone 162 related to an audit report and milestone 164 related to the publication of a market assessment of the scope of the public service obligation, . It is accompanied in this payment request by milestone 163 related to measures on transport by the Ministry of Transport and Communications.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled
2	Public service contract for public rail transport on the territory of the Republic of Bulgaria for Lot 1 (number Д-3/11.02.2026) signed on 11 February 2026 by the Minister of Transport and Communications and the Director of Finance	Copy of the signed contract for the Western region called ‘Performance of public rail transport services on all railway lines in Western region’

	Directorate, for the Ministry of Transport and Communications, and the Managing Director of BDZ-Passengers EOOD.	
3	Public service contract for public rail transport on the territory of the Republic of Bulgaria for Lot 2 (number Д-2/11.02.2026) signed on 11 February 2026 by the Minister of Transport and Communications and the Director of Finance Directorate, for the Ministry of Transport and Communications, and the Executive Director of Ivkoni Express EAD.	Copy of the signed contract for the Northen region called 'Performance of public rail transport services on all railway lines in Northen region'
4	Public service contract for public rail transport on the territory of the Republic of Bulgaria for Lot 3 (number Д-4/11.02.2026) signed on 11 February 2026 by Minister of Transport and Communications and the Director of Finance Directorate, for the Ministry of Transport and Communications, and the Executive Director of Ivkoni Express EAD.	Copy of the signed contract for the Southern region called 'Performance of public rail transport services on all railway lines in Southern region'
5	The report supporting the awarding decision of public service obligations for rail transport based on the evaluation of submitted bids signed by the Deputy Prime Minister and Minister for Transport and Communications on 15 December 2025.	Copy of the report of the evaluation committee justifying the selection of winning bidders Copy of the report presenting the conclusion of the work of a commission appointed by the Deputy Prime Minister and Minister of Transport and Communications to examine and evaluate tenders submitted in a public procurement procedure for rail passenger transport services in Bulgaria. It documents the assessment process and outcomes for the three separate lots (Western, Northern, and Southern). The report supports the awarding of public service obligations for rail transport based on the evaluation of submitted bids.

6	Links to the publication in the national public procurement platform.	Publications displaying eligibility and award criteria, as well as the evaluation methodology to be applied for the selection of successful bids. Links: *The procedure was published in the national public procurement platform at https://app.eop.bg/today/444870, as well as in the EU Tender electronic daily (TED) at https://ted.europa.eu/bg/notice/-/detail/564088-2025.*

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

The new public service contract(s) for the provision of public transport services by rail in Bulgaria shall be signed [...]

Three new public service contracts for the provision of public transport services by rail in Bulgaria were signed as following:

- the new public service contract Ref. Д 3Х - 'Exercise of public rail transport service on all railway lines in the Western region' (evidence No. 2) was signed on 11 February 2026, by the Ministry of Transport and Communications, represented by the Minister for Transport and Communication and BDZh-Patnicheski Prevki EOOD. According to Article 2.1 of the contract, the scope of the contract is to regulate the type, scope, quality characteristics, tariff, sales and financing of passenger rail transport on the territory of the Republic of Bulgaria under Lot 1, the subject of which is 'Operation of public rail transport services on all railway lines in the Western Region' in the performance of the public transport service. According to Article 2.2, the contractor shall provide the passengers with rail passenger transport services, as stipulated by the contract.
- the new public service contract Ref. Д 2Exercise of public rail transport service on all railway lines in Northern region (evidence No. 3) was signed on 11 February 2026, by the Ministry of Transport and Communications, represented by the Minister of Transport and Communications and Ivkoni Exprez EAD. According to Article 2.1 of the contract, the scope of the contract is to regulate the type, scope, quality characteristics, tariff, sales and financing of passenger rail transport on the territory of the Republic of Bulgaria under Lot 2, the subject of which is 'Operation of public rail transport services on all railway lines in the Northern Region' in the performance of the public transport service. According to Article 2.2, the contractor shall provide the passengers with rail passenger transport services, as stipulated by the contract.
- the new public service contract Ref. Д 4Exercise of public rail transport service on all railway lines in the Southern Region (evidence No. 4) was signed on 11 February 2026, by the Ministry of Transport and Communications, represented by the Minister of Transport and Communications and Ivkoni Exprez EAD.According to Article 2.1 of the contract, the scope of the contract is to regulate the type, scope, quality characteristics, tariff, sales and financing of passenger rail transport on the territory of the Republic of Bulgaria under Lot 3, the subject of which is 'Operation of public rail transport services on all railway lines in the Southern Region' in the performance of the public transport service. According to Article 2.2,

the contractor shall provide the passengers with rail passenger transport services, as stipulated by the contract.

[...] following a tender procedure

The three new public service contracts were awarded following a tender procedure launched on 29 August 2025 (evidence No. 6). The Commission services accessed the link provided by the authorities on 27 March 2026 to verify the publication of the tender and the results of the tender procedure. This check was completed successfully, confirming that the tender has been published and that the decision appointing the selected contractors was published on 15 December 2025 after the completion of the evaluation of the submitted offers (evidence no. 5).

The tender shall be divided into multiple lots

The tender for a new public service contract was divided into 3 separate lots: Lot 1 for the Western region, Lot 2 for the Northern region and Lot 3 for the Southern Region (evidence No. 6). The Commission services accessed the link provided by the authorities on 27.03.2026 to verify the division of the tender into multiple lots. This check was completed successfully, confirming that the tender has been divided into 3 separate lots.

The new public service contract(s) shall provide for its entry into force no later than 13 December 2026.

The new public service contracts entered into force on the date of their signature, which is 11 February 2026 (as per Article 18.2 of the respective contract). The effective date of the performance of the contract is 13 December 2026, as per Article 18.1 of the respective contract as well as the definition of 'Effective date of performance of the contract' included in Article 1.1. From this date, the operators are required to start performing the public service obligation assigned by the respective contract (evidence No.2-4).

The new contract(s) shall include the following provisions:
- **The rolling stock acquired after 2009, including under RRP, shall be provided to the operator(s) for free use and shall be determined in proportion to the volume of the service that will be performed.**

The requirement is explicitly incorporated into the contractual and technical framework governing the new public service contracts. In particular, Article 12.3.1 of each of the contracts stipulate that the Contracting Authority shall provide the rolling stock acquired after 2009, including the rolling stock financed under the National Recovery and Resilience Plan, to the operators for free use. Furthermore, the same Article stipulate that the provision of such rolling stock is determined proportionally to the volume of services to be performed (evidence No. 2-4).

- **The operator(s) shall have the possibility to rent the rolling stock acquired before 2009 and owned by the current operator.**

The possibility for operators to rent rolling stock acquired before 2009 and owned by the incumbent operator is provided in item 4.1.3 of the Technical Specification (evidence No. 2-4). The Technical Specification is annexed to each of the respective contracts (Annex 1 to the respective contract) and

it establishes that contractors may rent such rolling stock from “BDZ – Passenger Services” EOOD (the incumbent). It is also further reinforced by the Article 12.3.3.2 of the respective contracts, which stipulates that where the respective contract is to be performed on leased rolling stock owned by the incumbent carrier as described in Annex 3 to the Technical Specifications, the maintenance and servicing of this rolling stock shall be governed by a contract between the Contractor and the incumbent carrier.

- **The operator(s) shall be obliged to return the rolling stock to the owner in the condition in which it was received, taking into account the normal depreciation rate.**

Article 12.4 of each of the contracts stipulates that the contractor may use the rolling stock provided by the State exclusively for the performance of the assigned public transport services and is obliged, upon termination of the contract, to return it to the owner in the condition in which it was received, taking into account normal depreciation (evidence No. 2-4).

- **When calculating the compensation to operator(s), the public financing of the vehicles for their entire economically useful life shall be taken into account.**

Article 13.6 of each of the contracts defines the subsidy based on the net financial effects and stipulates that public financing of rolling stock over its entire economically useful life must be taken into account when calculating the compensation to the operator. In particular, it excludes depreciation deductions for assets financed under Article 12 of each of the contracts from the total depreciation expenses, thereby ensuring that public funding of the assets is reflected in the calculation of compensation (evidence No. 2-4).

4. Commission Preliminary Assessment: Satisfactory fulfilled.

Number and name of the Milestone: 178 Entry into force of legal act(s) on electric mobility

Related Measure: C8.R5 Electric mobility

Qualitative Indicator: Provision indicating the entry into force of legal act(s)

Time: Q4 2025

1. Context:

The objective of the reform is to increase the uptake of zero-emission and low-emission transport in Bulgaria. The reform consists in the entry into force of legal act(s) on electric mobility as well as the introduction of low-emission zones.

The milestone requires the entry into force of legal act(s) that provide for the simplification of the connection procedure for charging stations installed for personal use and an obligation for mayors of municipalities with a population of more than 5 000 inhabitants to build at least one publicly accessible charging station. The legal act(s) shall also introduce an annual tax depreciation rate for electric vehicles.

Milestone 178 is the first milestone of the reform. It is accompanied in this payment request by milestone 181, related to the introduction of low-emission zones.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled
2	Copy of the publication of the regulation amending and supplementing Ordinance No 6 of 28 March 2024 on the accession of facilities connected to the electricity networks in the State Gazette (SG No. 35/ 14 April 2026)	The Regulation was adopted on the basis of Article 116 (7) of the Energy Act by a decision of the Energy and Water Regulatory Commission. In line with its Transitional and Final Provisions, it entered into force on the day of its promulgation in the State Gazette – 14 April 2026.
3	Copy of the publication of the Public Transport Act in the State Gazette (SG No. 32/ 01.04.2026)	The Public Transport Act was adopted by the 51st National Assembly on 19 March 2026. In line with paragraph 10 of its final provisions, the act entered into force 14 days after its promulgation in the State Gazette on 1 April

		2026; therefore, on 16 April 2026.
4	Copy of the publication of the amended Corporate Income Tax Act in the State Gazette (SG No. 30/ 27.03.2026)	The amendments to the Corporate Income Tax Act were adopted by the 51st National Assembly on 13 March 2026. In line with paragraph 22 of its final provisions, the amendments entered into force on 1 January 2026.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Entry into force of legal act(s) on electric mobility

The regulation amending and supplementing Ordinance No. 6 of 28 March 2024 on the accession of facilities connected to the electricity networks (Evidence No. 2) entered into force on the day of its promulgation in the State Gazette on 14 April 2026, in line with its transitional and final provisions.

The Public Transport Act (Evidence No. 3) entered into force on 16 April 2026, 14 days after its promulgation in the State Gazette on 1 April 2026, in line with paragraph 10 of its final provisions.

The amended Corporate Income Tax Act (Evidence No. 4) entered into force on 1 January 2026, in line with paragraph 22 of its final provisions.

The legal act(s) shall provide for:

- **simplification of the connection procedure for charging stations installed for personal use.**

The regulation amending and supplementing Ordinance No. 6 of 28 March 2024 on the accession of facilities connected to the electricity networks (hereinafter 'Ordinance No. 6'; Evidence No. 2) introduces a new provision into Ordinance No. 6 that simplifies connection procedures for charging stations installed for personal use. Under the newly inserted Article 7a, no connection request is required for connections of 'a charging point, a charging pool and/or a charging station intended for own use[...]' within an already existing and connected facility, such as a house or office, provided that the connected capacity is not increased and no electricity is fed back into the grid. In such cases, the charging infrastructure is treated as part of the existing electricity consumption of the facility and does not trigger a new connection procedure that would be otherwise required. Therefore, the connection procedure for charging stations for personal use is simplified by the introduction of this provision.

- **an obligation for mayors of municipalities with a population of more than 5 000 inhabitants to build at least one publicly accessible charging station**

Article 34 paragraph 6 of the Public Transport Act (Evidence No. 3) states that 'Mayors of municipalities shall build and enable the use of public plug-in fast-charging stations with a capacity of at least 22 kW in: 1. municipalities with a population of more than 5000 inhabitants – at least one charging station; 2. municipalities with a population of 10 000 to 100 000 inhabitants – at least three charging stations; 3. cities with a population of more than 100 000 inhabitants –-at least 5 charging stations; 4. cities with more than 300 000 inhabitants – at least 10 charging stations.' As stated in the article, mayors of municipalities are obliged to build at least one publicly accessible charging station for municipalities with a population of more than 5 000 inhabitants.

The legal act(s) shall also introduce an annual tax depreciation rate for electric vehicles.

The amended Corporate Income Tax Act (Evidence No. 4) contains a categorisation of amortisable assets for the purpose of determining annual tax depreciations. Pursuant to Article 58, paragraph 1, item 5, vehicles are classified in Category V. Pursuant to paragraph 2 of the same provision, the annual tax depreciation rates are determined once per year, and for Category V assets (vehicles), they may not exceed 25%. With the amendment, a new subparagraph 8 is added to Article 55 (paragraph 3), which effectively creates a new subcategory of 'electric vehicles' under Category V assets. For this new category of electric vehicles, the act stipulates that the annual tax depreciation rate shall not exceed 50%. Therefore, the amendment to the Corprate Income Tax Act (Evidence No. 4) introduces a subcategory of electric vehicles, for which an separate annual tax depreciation rate is defined.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 181 Low-emission zones

Related Measure: C8.R5 Electric mobility

Qualitative Indicator: Low-emission zones introduced

Time: Q4 2025

1. Context:

The objective of the reform is to increase the uptake of zero-emission and low-emission transport in Bulgaria. The reform consists in the entry into force of legal act(s) on electric mobility as well as the introduction of low-emission zones.

The milestone consists in the introduction of low-emission zones in Sofia and Plovdiv that are applicable for at least part of the year. The entry and circulation of vehicles of categories M1 and N1 of at least the first environmental group under Bulgarian legislation shall be prohibited into those zones.

Milestone 181 is the second milestone of the reform, and it is accompanied by milestone 178, related to the entry into force of legal act(s) on electric mobility.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled
2	Ordinance on the Establishment of Low-Emission Zones for Air Pollutants in the Territory of Sofia Municipality	The ordinance was adopted by Decision No. 931 of the Sofia Municipal Council under Protocol No. 67 of 15 December 2022, and entered into force on 1 December 2023, as set out in its preamble. The ordinance was published on the website of Sofia Municipality on 22 December 2022 and is available at https://sofia.obshtini.bg/doc/5053858. Decision No. 931 specifying the publication date under point 3 is available here: https://council.sofia.bg/meetings-mandat-2019-2023/-/asset_publisher/S1BuW6FACg5q/content/%D0%97%D0%B0%D1%81%D0%B5%D0%B4%D0%B0%D0%BD%D0%B8%D0%B5-%E2%84%96-67-%D0%BE%D1%82-15.12.2022-%D0%B3%D0%BE%D0%B4%D0%B8%D0%BD%D0%B0?_com_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_S1BuW6FACg5q_assetEntryId=1450769&_com_liferay_asset_publisher_web_portlet_AssetPubl

		isherPortlet_INSTANCE_S1BuW6FACg5q_redirect=https%3A%2F%2Fcouncil.sofia.bg%3A443%2Fmeetings-mandat-2019-2023%3Fp_p_id%3Dcom_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_S1BuW6FACg5q%26p_p_lifecycle%3D0%26p_p_state%3Dnormal%26p_p_mode%3Dview%26_com_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_S1BuW6FACg5q_assetEntryId%3D1450769%26_com_liferay_asset_publisher_web_portlet_AssetPublisherPortlet_INSTANCE_S1BuW6FACg5q_cur%3D0%26p_r_p_resetCur%3Dfalse
3	Ordinance on the Establishment of Low Emission Zones for Air Pollutants in the Territory of Plovdiv Municipality	The ordinance was adopted by Decision No. 329 of the Plovdiv Municipal Council under Protocol No. 16 of 18 September 2025, and entered into force with its publication on the website of Plovdiv Municipality on 25 September 2025, as set out in its transitional and final provisions. Available here: https://plovdiv.obshtini.bg/doc/6594033 , while the Decision No. 329, specifying the publication date, is available here: https://plovdiv.obshtini.bg/doc/6594032
4	Ordinance No. H 32 of 16 December 2011 on periodic inspections for checking the roadworthiness of road vehicles (PTI)	This ordinance defines what each environmental group represents in relation to the official EURO standard. It was promulgated in the state gazette Nr. 104 on 27 December 2011 and entered into force on 1 January 2012. It is available at https://www.lex.bg/laws/ldoc/2135766401
5	Ordinance Amending and Supplementing Ordinance No. H 32	This ordinance amends and supplements Ordinance No. H 32, including it Article 37a.1. It was promulgated in the state gazette Nr 115 on 30 December 2025 and entered into force on 1 January 2026, in line with its paragraph 44.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Low-emission zones shall be introduced and applicable for at least part of the year in Sofia and Plovdiv.
The entry and circulation of vehicles of categories M1 and N1 of at least the first environmental group under Bulgarian legislation shall be prohibited into those zones.
Furthermore, in line with the description of the measures, the reform consists in […] **the introduction of low-emission zones**.

The ordinance on the Establishment of Low-Emission Zones (hereinafter referred to as “LEZ”) for Air Pollutants in the Territory of Sofia Municipality (hereinafter the “Sofia LEZ ordinance”, Evidence No. 2) was adopted on 15 December 2022, published on the website of Sofia Municipality on 22 December 2022 and entered into force on 1 December 2023, as set out in its preamble. Article 9 of the Sofia LEZ ordinance specifies the areas for which the LEZ is introduced, namely i) a Small Ring Zone (area enclosed by Vasil Levski Blvd., Patriarch Evtimiy Blvd., Ghen Blvd. Skobbeev, Oplechenska

Street, Slivnitsa Blvd) and ii) a Greater Ring zone (area enclosed by: Slivnitsa Blvd., Danail Nikolayev Blvd., Sitniakovo Blvd., Mihai Eminescu Blvd., Yavorov Blvd., Nikola Y. Vaptsarov Blvd., Atanas Dukov Blvd., Lyuba Velichkova Blvd., Silburna Blvd., X. Ibsen Blvd., P. Y. Todorov Blvd., I. E. Geshov Blvd., K. Velichkov Blvd). Article 11 of the Sofia LEZ ordinance specifies that entry and circulation into the LEZ of Sofia Municipality as outlined above is prohibited for certain vehicles classes (see below) from 3 December to the last day of February of each year. Therefore, the LEZ is applicable during this period.

Thus, the Sofia LEZ ordinance proves that a LEZ has been introduced in Sofia, applicable for part of the year from 3 December to the last day of February of each year, as of 1 December 2023.

The Ordinance on the Establishment of Low Emission Zones for Air Pollutants in the Territory of Plovdiv Municipality (hereinafter referred to as "Plovdiv LEZ ordinance", Evidence No. 3) was adopted on 18 September 2025 and entered into force with its publication on the website of Plovdiv Municipality on 25 September 2025, as set out in its transitional and final provisions. Article 5 of the Plovdiv LEZ ordinance introduces the LEZ and specifies that restrictions apply for certain vehicle classes (see below) in a little ring zone (area surrounded by Tsar Boris III Unifier Blvd., Hristo Botev Blvd., Shesti Septemvri Blvd.).

Ordinance No. H 32 of 16 December 2011 on periodic inspections for checking the roadworthiness of road vehicles (hereinafter referred to as "PTI", Evidence No. 4), which entered into force on 1 January 2012, defines environmental vehicle classes in Bulgaria and sets out the corresponding EURO classification. Its Article 37a.1 was amended by paragraph 15 of the Ordinance Amending and Supplementing Ordinance No. H 32 (Evidence No. 5), which entered into force on 1 January 2026, in line with its paragraph 44. Article 37a.1 specifies that there are five environmental groups under Bulgarian legislation.

Article 11 of the Sofia LEZ ordinance specifies that entry and circulation into the zones of Sofia Municipality as outlined above is prohibited during the period of applicability, with the following specifications: as of 1 December 2024, entry and circulation is prohibited for vehicles of categories M1 and N1 with first and second environmental group in the Small Ring zone. As of 1 December 2025, entry and circulation is prohibited for vehicles of categories M1 and N1 with the first environmental group in the Greater Ring Zone in Sofia.

Thus, the Sofia LEZ ordinance proves that the entry and circulation of vehicles of categories M1 and N1 of at least the first environmental group under Bulgarian legislation is prohibited into the LEZ in Sofia.

The Council Implementing Decision requires that low-emission zones shall [...] be applicable for at least part of the year in [...] Plovdiv and that the entry and circulation of vehicles of categories M1 and N1 of at least the first environmental group under Bulgarian legislation shall be prohibited into those zones. The Plovdiv LEZ ordinance (Evidence No. 3), which introduces the LEZ in Plovdiv, entered into force with its publication on the Plovdiv Municipality website on 25 September 2025. However, the date of first application of the introduced LEZ is 1 October 2026, as set out in Article 5(1)(1). Article 2.2 in the Annex of the Plovdiv LEZ ordinance defines that the LEZ in Plovdiv shall apply to road vehicles of categories M1 and N1. Article 5(1)(1) of the Plovdiv LEZ ordinance specifies that entry and circulation into the little ring zone of Plovdiv Municipality as outlined above is prohibited for vehicles of categories M1 and N1 with first and second environmental groups during the period 1 October to 30 April each year, as of 1 October 2026. Whilst this constitutes a minimal temporal deviation from the requirement of the Council Implementing Decision, the delay between the entry into force of the Plovdiv LEZ ordinance and the start of application of the provisions is considered both limited and proportional. The LEZ was introduced three working days before the

commencement of the annual period during which the zone is applicable. The establishment of a LEZ entails complex technical and administrative preparations, as well as the information campaigns targeting the local population. As a consequence, this limited timeframe would not have been sufficient to ensure the effective deployment and operationalisation of the LEZ. Given that the period of applicability of the zone runs annually from 1 October to 30 April, the earliest feasible date for the applicability of the LEZ, which coincides with the start of the prohibition of the entry and circulation of vehicles of categories M1 and N1 of at least the first environmental group under Bulgarian legislation into the Plovdiv LEZ is therefore 1 October 2026. Moreover, as the Plovdiv LEZ ordinance has already entered into force and the LEZ in Plovdiv has been introduced, there is certainty that the start of application of the LEZ is legally binding. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 215 Entry into force of legal act(s) on e-justice in administrative cases

Related Measure: C10.R1 Reform in the justice system

Qualitative Indicator: Provisions in the legal act(s) indicating the entry into force

Time: Q4 2025

1. Context:

The objective of the reform is to improve the justice system and contribute to its accessibility. The reform consists in (i) the entry into force of legal act(s) on the digitalisation of certain judicial acts and processes; (ii) the entry into force of legal act(s) related to free legal assistance and exemptions from court fees; and (iii) the adoption of a roadmap related to follow-up on judgments of the European Court of Human Rights.

Milestone 215 requires the entry into force of legal act(s), which shall provide for the possibility for: (i) a judicial act related to administrative case(s) to be drawn up as an electronic document and to be signed with a qualified electronic signature, with the exception of judicial acts that cannot be drafted in written format due to their nature, or where other legal provision(s) provide otherwise; (ii) the parties in administrative legal proceedings to submit administrative documents in an electronic form; (iii) holding virtual hearings in administrative legal proceedings.

Milestone 215 is the third and last milestone of the reform, and it follows the completion of milestone 213 related to the adoption of a Roadmap by the Council of Ministers for the implementation of judgments of the European Court of Human Rights and milestone 214, related to the entry into force of legislative amendments to the Legal Assistance Act.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled.
2	Copy of State Gazette, Issue 63 of 1 August 2025, containing the Law amending and supplementing the Administrative Procedure Code, adopted by the 51st National Assembly on 24 July 2025.	Copy of the State Gazette Issue 63 of 1 August 2025, where the Law amending and supplementing the Administrative Procedure Code was published. Also available on the website of the Bulgarian Parliament, here: https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=236378
3	Copy of the	Copy of the consolidated version of the Administrative

	consolidated version of the Administrative Procedure Code	Procedure Code as amended by the Law amending and supplementing the Administrative Procedure Code, adopted by the 51st National Assembly on 24 July 2025

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Entry into force of legal act(s) on e-justice in administrative cases. Furthermore, in line with the description of the measure, **the reform consists in (i) the entry into force of legal act(s) on the digitalisation of certain judicial acts and processes.**

The Law amending and supplementing the Administrative Procedure Code was published in the Official Gazette of Bulgaria Issue 63 on 1 August 2025. According to its Paragraph 43, the Law amending and supplementing the Administrative Procedure Code enters into force as follows:

- Paragraphs 38 and 39 on 1 August 2025;
- Paragraphs 10, 11, 13, 19, 23, 27, 29, 30, 32, 33, 40, 43 on 5 August 2025;
- Paragraphs 12, 20, 26, 37, 41 on 2 September 2025;
- Paragraphs 14 and 42 on 1 January 2026;
- Paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 15, 16, 17, 18, 21, 22, 24, 25, 28, 31, 34, 35, 36 on 1 July 2026.

The Council Implementing Decision required that the legal act(s) on the digitalisation of certain judicial acts shall enter into force. Bulgaria has published in the Official Gazette of Bulgaria, Issue 63 of 1 August 2025 the Law amending and supplementing the Administrative Procedure Code, which includes provisions on drawing up judicial acts in electronic form, submitting the parties' administrative acts in electronic form and hold virtual hearings in administrative legal proceedings. According to Article 43 of the Law amending and supplementing the Administrative Procedure Code, paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 15, 16, 17, 18, 21, 22, 24, 25, 28, 31, 34, 35, 36 – all touching upon performance of actions through electronic means, will enter into force on 1 July 2026. Most importantly, for the purpose of this assessment:

- Paragraph 2 amends Article 18a to regulate the electronic submission of complaints or protests, including the obligation for the authority that issued the contested act to send them to the court with the electronic file on the issuance of the act.
- Paragraph 5 introduces Article 29a, which establishes the rules for submitting requests for individual administrative acts electronically, including the obligation for authorities to accept such requests and confirm receipt.
- Paragraph 15 amends Article 137 to include the Ombudsman in the list of entities that must be served electronically.
- Paragraph 16 amends Article 142b to allow procedural actions to be performed electronically.
- Paragraph 17 inserts Article 142c, which allows courts to conduct hearings via videoconference for security or other important reasons, including notification requirements and recording procedures.
- Paragraph 18 inserts Article 142d, permitting courts to issue acts and perform procedural actions electronically, unless the nature of the act or law requires otherwise.

- Paragraph 25 amends Article 172a to introduce a requirement that court decisions prepared in electronic form must be signed with a qualified electronic signature and registered in the court's information system.

Whilst this constitutes a minimal temporal deviation from the requirement of the Council Implementing Decision, the delay between the publication of this law and the actual application of the provisions is considered both limited and proportional, notably it will enable the Bulgarian authorities to undertake necessary preparatory activities for an ordered entry into application of the new provisions. First, paragraph 39 of the transitional and final provisions of the Law amending and supplementing the Administrative Procedure Code provide that by 1 April 2026, Administrative authorities shall register in the single e-Justice portal and in the Information System for Secure Electronic Delivery; second, paragraph 38 of the transitional and final provisions of the Law amending and supplementing the Administrative Procedure Code provide that by 30 June 2026, the Council of Ministers and the local self-government bodies and the local administration shall provide technological and technical capability for the fulfilment of the obligations under Article 152, paragraph 2 of the same act such as forwarding appeals and electronic files to the courts following the submission of an appeal or complaint to the authority which issued the contested administrative act. Moreover, the law provides for a specific date of entry into force of these provisions which ensures certainty of their application without the need for the Bulgarian authorities to take further procedural steps and the beginning of legal effects of the Law amending and supplementing the Administrative Procedure Code has already taken place. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Following the publication in the Official Gazette of Bulgaria, Issue 63 of 1 August 2025, of the Law amending and supplementing the Administrative Procedure Code, which includes provisions on drawing up judicial acts in electronic form, submitting the parties' administrative acts in electronic form and hold virtual hearings in administrative legal proceedings, and based on the arguments above, the description of the measure whereby the reform consists in the entry into force of legal act(s) on the digitalisation of certain judicial acts and processes is satisfactorily fulfilled too.

The legal act(s) shall provide for the possibility for:
- a judicial act related to administrative case(s) to be drawn up as an electronic document and to be signed with a qualified electronic signature, with the exception of judicial acts that cannot be drafted in written format due to their nature, or where other legal provision(s) provide otherwise;

The Law amending and supplementing the Administrative Procedure Code was published in the Official Gazette of Bulgaria on 1 August 2025.

The scope of application of the Administrative Procedure Code, which was not modified by the Law amending and supplementing the Administrative Procedure Code, is defined in Article 1 of the Administrative Procedure Code. According to that provision, the Administrative Procedure Code governs "1. the issue, challenge and enforcement of administrative acts, as well as the judicial challenge of secondary legislation; 2. handling and resolving reports and proposals from citizens and organisations; 3. proceedings for compensation for damage resulting from unlawful acts, actions or omissions of administrative bodies and officials, as well as for damage resulting from the judicial activity of the administrative courts and the Supreme Administrative Court; 4. the examination of requests to oblige an administrative authority to perform or to refrain from certain action; 5. work to unify administrative case law; 6. the enforcement of administrative and judicial decisions in

administrative cases; 7. the provision of comprehensive administrative services; 8. administrative contracts". The rules governing judicial proceedings are set out in Title 3 of the Administrative Procedure Code. They gave administrative courts jurisdiction in cases covering among others administrative acts and administrative contracts, as well as omissions of the administration (Article 128 of the Administrative Procedure Code). In this assessment, reference to "administrative legal proceedings" includes judicial proceedings falling within the scope of the Administrative Procedure Code.

Paragraph 18 of the Law amending and supplementing the Administrative Procedure Code introduced in the Administrative Procedure Code a new Article 142d on "Procedural actions of the court in electronic form" which states that the court may issue acts and carry out all other procedural acts provided for by law in electronic form, unless their nature renders this impossible or the law provides for them to be performed in another way. Paragraph 25 of the Law amending and supplementing the Administrative Procedure Code introduced in the Administrative Procedure Code a new paragraph 4 in Article 172a which requires that when a judgment is dawn up in electronic form, it shall be signed with a qualified electronic signature and registered in the court's information system.

- the parties in administrative legal proceedings to submit administrative documents in an electronic form;

According to Article 18a, paragraph 1, of the Administrative Procedure Code all parties in the administrative legal proceedings are entitled to submit their administrative documents, such as requests, reports and proposals, complaints, protests, applications, claims and annexes thereto, electronically to administrative bodies, judicial authorities, persons performing public functions and organisations providing public services. Paragraph 2 of the Law amending and supplementing the Administrative Procedure Code amends and supplements Article 18a as follows:

- As regards the utilisation of electronic means for parties to submit complaints or protests, Article 18a, paragraph 3 is amended to provide that where the complaint or protest is submitted electronically through the authority that issued the contested act, it shall be filed in accordance with the e-Government Act, and within three days from the expiry of the time limits for challenge by the other persons, the authority shall send the appeal or protest to the court together with the electronic file on the issuance of the act, notifying the sender thereof. In case the authority fails to fulfil its obligation, the appeal or protest may be submitted to the court electronically under the Judiciary Act, and the court shall request the file ex officio from the authority that issued the act;
- As regards the electronic service of documents, Article 18a, paragraph 5 provides that the electronic service is mandatory for the qualified subjects, which are the following: administrative bodies, judicial authorities, the Ombudsman, persons performing public functions and organisations providing public services, organisations and lawyers (Article 18a, paragraph 5 and Article 137, paragraph 2 of the Administrative Procedure Code) and they must indicate an electronic address for summoning and receiving documents and messages through the Information System for Secure Electronic Delivery – in proceedings before an administrative body; or through the single e-Justice portal or through the Information System for Secure Electronic Delivery – in proceedings before a court.

Article 29a of the Administrative Procedure Code, as introduced by paragraph 5 of the Law amending and supplementing the Administrative Procedure Code, provides in its paragraph 1 that the request for the issuance of an individual administrative act may also be submitted as an electronic document by electronic means. According to paragraph 3 of Article 29a, administrative bodies are obliged to accept the request electronically when the relevant requirements are met.

Furthermore, paragraph 4 of Article 29a provides that the administrative authorities must ensure that proceedings for the adoption of individual administrative acts may be carried out by electronic means, except where the nature of the proceedings or acts makes this impossible or the law provides for a particular form for the performance of individual acts or the issuance of the relevant acts.

As regards the submission of documents in an electronic form during judicial proceedings within the scope of the Administrative Procedure Code, Article 142b of the Administrative Procedure Code, paragraph 2, as amended by paragraph 16 of the Law amending and supplementing the Administrative Procedure Code , provides, that outside open hearings – where the parties perform procedural actions orally – the parties and other participants can perform their written procedural actions in electronic form through the Unified Portal for E-Justice (managed by the Supreme Judicial Council), or the information System for Secure Electronic Delivery (managed by the Ministry of E-Government). For that purpose, electronic statements to the court must be signed with a qualified electronic signature.

- holding virtual hearings in administrative legal proceedings.

Paragraph 17 of the Law amending and supplementing the Administrative Procedure Code introduced in the Administrative Procedure Code a new Article 142c on "'Performing procedural actions by videoconference".

Article 142c of the Administrative Procedure Code, as introduced by paragraph 17 of the Law amending and supplementing the Administrative Procedure Code, empowers courts to accept a performance of procedural actions by the parties and other participants via video conference instead of their physical presence in the open hearing. The court can order a party or its representative, witness, expert or interpreter to participate in an open court hearing by videoconference on its own initiative, when there are security reasons or other important reasons (Article 142c, paragraph (1)), or at the request of the party or other participant involved in case of objective impossibility to appear in the court building (Article 142c, paragraph (3)). Minutes and a video recording of the hearing and the procedural acts carried out by videoconference must be drawn up and attached to the case (Article 142c, paragraph (4)).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 218 Entry into force of legal act(s) providing for the set-up of an Anti-corruption body

Related Measure: C10R2 Anti-corruption

Qualitative Indicator: Provision in the legal act(s) indicating the entry into force

Time: Q4 2025

1. Context:

The objective of this reform is to further combat corruption at all levels of public administration, justice and prosecution systems.

Milestone 218 concerns the entry into force of the legal act(s) providing for the set-up of a politically and financially independent Anti-corruption body. The legal act(s) shall provide that the Anti-corruption body: shall have its management appointed under a transparent process ensuring political independence; shall have the authority to investigate and gather evidence, subject to legal safeguards for the rights and freedoms of individuals and businesses; shall refer to the Illegal Asset Forfeiture Body cases of significant discrepancies in assets or conflict of interest; shall support the development of integrity checks; shall cooperate with the European Public Prosecutor's Office.

Milestone 218 is the fourth step of the implementation of the reform, together with milestone 223 on regulating lobbying. It follows the completion of milestone 217 on the amendments to the legal framework related to whistleblowing, milestone 219 on the role of the Inspectorate to the Supreme Judicial Council and milestone 222 on legislative amendments to safeguard the effectiveness of criminal proceedings and improve the accountability and criminal liability of the Prosecutor General. It will be followed by milestone 220 on setting up the anti-corruption body and milestone 226a on the introduction of tools to counter corruption and promote integrity.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled
2	Copy of the publication in State Gazette No. 51 of 5 June 2026 of the Law on the countering of corruption among persons holding public office	The law was adopted by the National Assembly on 29 May 2026, https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=243769

3	Copy of the Law on the Confiscation of Illegally Acquired Assets, as amended by the the Law on the countering of corruption among persons holding public office	The Law on the Confiscation of Illegally Acquired Assets, was amended by the National Assembly with the adoption of the the Law on the countering of corruption among persons holding public office from 29 May 2006, https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=243769
4	Copy of the Criminal Procedure Code, as amended by the the Law on the countering of corruption among persons holding public office	The Criminal Procedure Code was amended by the National Assembly with the adoption of the the Law on the countering of corruption among persons holding public office from 29 May 2006, https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=243769
5	Copy of the Justice System Act, as amended by the the Law on the countering of corruption among persons holding public office	The Justice System Act was amended by the National Assembly with the adoption of the the Law on the countering of corruption among persons holding public office from 29 May 2006, https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=243769

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

The assessment of the milestone for the purposes of payments from the Recovery and Resilience Facility is without prejudice to the assessment by the Commission in any proceedings on the conformity of the national law with Union law, including the Rule of Law mechanism.

Entry into force of legal act(s) providing for the set-up of an Anti-corruption body.

The new Law on the countering of corruption among persons holding public office (hereafter referred to as the "Anti-corruption Law") was published in the State Gazette No. 51 of 5 June 2026. In accordance with § 93 of the Transitional and Final Provisions, the Law entered into force on the date of its promulgation in the State Gazette, except for Article 63(7)-(11) and Article 63(12), second sentence, which shall enter into force 18 months after its promulgation. Those provisions regulate the establishment and maintenance of a unified electronic declarations system through which the Anti-corruption body is to receive, process and analyse declarations, including declarations of incompatibility and declarations of assets and interests. The method via which the Anti-corruption body receives such declarations is unrelated to the set-up of an Anti-corruption body and, therefore, Article 63(7)-(11) and Article 63(12), second sentence, of the Anti-corruption Law are not relevant to the assessment of the milestone. Nonetheless, it is noted for completeness that the Anti-corruption body will still receive such asset declarations in the time-period before the unified electronic declarations system is established. Article 61(5) of the Anti-corruption Law already establishes a regime for providing for the submission of declarations stating that "*declarations shall be submitted in paper form and on an electronic data carrier, or by electronic means, including through the Secure Electronic Delivery System*", where in accordance with Article 61(2) those declarations are to be provided to the Anti-corruption. Accordingly, the deferred entry into force of Article 63(7)-(11) and

Article 63(12), second sentence, of the Anti-corruption Law do not affect the existing legal regime allowing the submission of declarations, but only postpones the operation of the new unified electronic declarations system.

The legal act(s) shall provide for the set-up of a […] financially independent Anti-corruption body.

SETTING-UP THE ANTI-CORRUPTION BODY

The Anti-corruption Law provides for the set-up of the new Commission for Counteracting Corruption (hereinafter referred to as the "Anti-corruption Commission"), which is the Anti-corruption body. The Anti-corruption Law establishes in Article 6(1) the new Anti-corruption Commission as "an independent, specialised, permanent state body for the prevention of and countering corruption among persons holding public office".

Paragraph 17, item 3, of the Transitional and Final Provisions of the Anti-corruption Law amends Article 194 of the Criminal Procedure Code, adding paragraph 6, to stipulate that, for corruption offences under the Criminal Code as well as any other criminal offence committed in connection with those listed above, committed by the persons under Article 5(1) of the Anti-corruption Law, the investigation shall be conducted by investigating inspectors from the Anti-corruption Commission. This establishes the Anti-corruption Commission's competence to investigate corruption-related offences committed by persons holding public office, including but not limited to the President and Vice President of the Republic, Members of the National Assembly, the Prime Minister, Ministers, Deputy Ministers, Members of the European Parliament and the European Commission from Bulgaria, Members of the Constitutional Court, the Presidents of the Supreme Courts, and the Prosecutor General. In addition, the Anti-corruption Commission is also competent to investigate members of the Supreme Judicial Council and the Inspectorate to the Supreme Judicial Council.

FINANCIAL INDEPENDENCE

According to Article 6(2) of the Anti-corruption Law, the Anti-corruption Commission is a legal entity funded by the state budget and its budget is drawn up, executed and accounted for in accordance with the Public Finance Act. Under Article 7(6) of the Anti-corruption Law, the Chair of the Anti-corruption Commission is the primary budget administrator. Article 11(3) of the Public Finance Act provides that primary budget administrators are responsible for drafting, executing, and reporting on budgets. Pursuant to Article 7(7) of the Public Finance Act, they are also required to develop and adopt internal rules for the organisation of the budget process, while Article 100(1) of the Public Finance Act mandates that they organise and manage the execution of their budgets.

Taken together, these provisions demonstrate that the Anti-corruption Commission is financially independent, as they establish it as a separate legal entity with its own dedicated budget under the state budget and confer on its Chair, as primary budget administrator, responsibility for the preparation, execution, internal organisation and reporting of that budget in accordance with the Public Finance Act.

The legal act(s) shall provide for the set-up of a politically […] independent Anti-corruption body.
The legal act(s) shall provide that the Anti-corruption body:
- shall have its management appointed under a transparent process ensuring political independence.

The assessment of whether the legal acts provide that the management of the Anti-corruption Commission is appointed under a transparent process ensuring political independence is based on the following considerations.

First, the five members of the Anti-corruption Commission are appointed or elected by five different institutions and professional bodies: the National Assembly, the President of the Republic, the General Assembly of Judges of the Supreme Court of Cassation, the General Assembly of Judges of the Supreme Administrative Court, and the Supreme Bar Council (Article 7(1) of the Anti-corruption Law). This diversified appointment model aims at reducing the risk of undue political influence by a single institution and ensures pluralism. The law also lays down clear and stringent eligibility, incompatibility and integrity requirements. These include requirements as to the candidates' professional qualifications and experience (Articles 7(3) and 12(1) of the Anti-corruption Law), the submission of declarations of incompatibility and of assets and interests (Articles 8(5), 9(2), 10(6) and 11(5) of the Anti-corruption Law), and safeguards excluding persons with recent political roles or links to political parties (Articles 7(3), 12(1) and 12(6) of the Anti-corruption Law).

Second, the appointment or election procedures before each of the five bodies include guarantees to ensure a transparent process. The Anti-corruption Law provides for the publication of nominations and supporting documents in the procedures in front of all five appointing or electing bodies (Articles 8(3), 9(2), 10(5), 10(8), 11(4) and 11(7) of the Anti-corruption Law). Public hearings are provided for before the specialised committee of the National Assembly, the Competition Committee of the Supreme Court of Cassation, the Competition Committee of the Supreme Administrative Court, and the Supreme Bar Council (Articles 8(9), 10(11) and 11(11) of the Anti-corruption Law). The possibility for various entities such as non-profit legal entities registered to carry out public benefit activities, higher education institutions, scientific organisations, professional bodies and the media to submit opinions and questions is also provided for across the procedures before the Parliament, the Supreme Courts and the Bar Council as applicable (e.g. Articles 8(7), 10(12) and 11(10) of the Anti-corruption Law). Under Article 9(5) of the Anti-corruption Law, non-profit legal entities registered to carry out public benefit activities, the Supreme Bar Council, higher education institutions, and scientific organisations can also submit an opinion on the candidate to the Administration of the President.

For the members elected by the Supreme Courts and the Supreme Bar Council, the framework also provides for public election procedures before the General Assembly of Judges of the Supreme Court of Cassation, the General Assembly of Judges of the Supreme Administrative Court and the Supreme Bar Council (Articles 10(13), 10(23), 10(25), 11(11), 11(12) and 11(13) of the Anti-corruption Law). It also provides for judicial review of the election outcome in those procedures (Article 10(26) to 10(29) and Article 11(14) to 11(16) of the Anti-corruption Law).

Third, the fixed five-year term of office and its non-renewable nature, (Articles 7(4) and 12(2) of the Anti-corruption Law), as well as the fact that dismissal of the members of the Anti-Corruption Commission is limited to grounds exhaustively defined by law (Article 13 of the Anti-corruption Law), further support the independence of the management of the Anti-corruption Commission.

Taken together, these elements provide guarantees that the management of the Anti-corruption Commission is appointed under a transparent process ensuring political independence and that the newly set-up Anti-corruption Commission is politically independent. All these elements are further detailed below.

Composition and eligibility of members of the Anti-corruption Commission

The Anti-corruption Law stipulates in Article 7(1) that the new Anti-corruption Commission is a collegiate body consisting of five members, as follows:

1. one member shall be elected by the National Assembly;
2. one member shall be appointed by the President of the Republic of Bulgaria;
3. one member shall be elected by the General Assembly of Judges of the Supreme Court of Cassation;
4. one member shall be elected by the General Assembly of Judges of the Supreme Administrative Court;
5. one member shall be elected by the Supreme Bar Council.

In accordance with Article 7(2) of the Anti-corruption Law, the Anti-corruption Commission shall be chaired on a rotational basis for one year, with the Chair being determined by drawing lots.

Articles 7(3) and 12(1) of the Anti-corruption Law outline the eligibility requirements for members of the Anti-corruption Commission. They must be Bulgarian citizens possessing high professional and moral qualities, who hold a higher legal education with a master's educational and qualification degree and at least 10 years of legal experience, and be of an age that allows them to complete their five-year term of office before reaching the age of 65. Among other key requirements, each candidate must also not have been a member of a governing or supervisory body of a political party or coalition in the past five years and has also not been a candidate for a Member of Parliament, for President and Vice President, for a municipal councillor or mayor, or for a Member of the European Parliament from the Republic of Bulgaria nominated by a political party or coalition, nor have held the said offices.

Parliament

In accordance with Article 8(2) of the Anti-corruption Law, nominations for the member of the Anti-corruption Commission to be elected by the National Assembly are made by its members. Pursuant to Article 8(5) of the Anti-corruption Law, candidates shall submit a declaration of incompatibility and a declaration of assets and interests.

President

Pursuant to Article 9(1) of the Anti-corruption Law, the President of the Republic of Bulgaria announces the candidate for member of the Anti-corruption Commission. In accordance with Article 9(2) of the Anti-corruption Law, the declaration of incompatibility and the declaration of assets and interests are required. Pursuant to Article 9(5) of the Anti-corruption Law, if the candidate for member of the Anti-corruption Commission meets the eligibility requirements, the President of the Republic of Bulgaria issues a decree appointing a member of the Anti-corruption Commission.

Supreme Courts

Pursuant to Article 10(1) of the Anti-corruption Law, candidates to be elected by the General Assembly of Judges of the Supreme Court of Cassation and by the General Assembly of Judges of the Supreme Administrative Court may be judges. Under Article 10(2) of the Anti-corruption Law, nominations may be made by any judge. Pursuant to Article 10(6) of the Anti-corruption Law, the candidates shall submit a declaration of incompatibility. Pursuant to Article 10(7) of the Anti-corruption Law, the selection committee, which in accordance with Article 10(3) of the Anti-corruption Law consists of three judges from the Supreme Court of Cassation or, respectively, from the Supreme Administrative Court, shall request ex officio from the Inspectorate to the Supreme Judicial Council a copy of the report under Article 175g of the Justice System Act concerning the verification of the declaration of assets and interests submitted for the last year preceding the year of the election.

Supreme Bar Council

Under Article 11(1) of the Anti-corruption Law, the Supreme Bar Council shall elect a member of the Anti-corruption Commission from among the lawyers registered under the procedure of the Bar Act. Pursuant to Article 11(2) of the Anti-corruption Law, nominations for a member of the Anti-corruption Commission may be made by any lawyer. Pursuant to Article 11(5) of the Anti-corruption Law, the candidates shall submit a declaration of incompatibility and a declaration of assets and interests.

In accordance with Articles 8(6), 9(3), 10(7) and 11(6) of the Anti-corruption Law, compliance with candidates' declarations of assets and interests is subject to verification in each of the appointment or election procedures. Where discrepancies are established, the candidate concerned shall be excluded from participation in the respective procedure. Pursuant to § 3(4) of the Transitional and Final Provisions of the Anti-corruption Law, from the entry into force of this Act until three months after the Chair and members of the Anti-corruption Commission assume office, the activities relating to, inter alia, countering, the verification and analysis of declarations of assets and interests of persons holding public office, and the establishment of conflict of interest of persons holding public office shall be carried out, under the existing arrangements, by the respective competent authorities. For candidates for the procedures by the Supreme Courts, pursuant to Article 10(7) of the Anti-corruption Law, the Competition Committee requests ex officio from the Inspectorate to the Supreme Judicial Council a copy of the report under Article 175g of the Justice System Act regarding the conducted verification of the declaration of assets and interests, submitted for the last year preceding the year of the election.

In addition, in accordance with Article 12(6) of the Anti-corruption Law, upon assuming office, members of the Anti-corruption Commission sign a declaration of political neutrality. The independence of the Anti-Corruption Commission is also referred to in Article 6(1) of the Anti-corruption Law. Moreover, Article 4 of the Anti-corruption Law provides that the law shall be implemented in due respect for the principles of transparency, independence, objectivity, impartiality and political neutrality. Pursuant to Article 7(4) of the Anti-corruption Law, the term of office of the members of the Anti-corruption Commission is five years and as stated in Article 12(2) of the Anti-corruption Law, each member is entitled to only one term of office. Pursuant to Article 7(2) of the Anti-corruption Law, the Anti-corruption Commission shall be chaired on a rotational basis for a term of one year, with the Chair being determined by lot. Under Paragraph 3(3) of the Transitional and Final Provisions of the Anti-corruption Law, the newly elected, respectively appointed, Chair and members of the Anti-Corruption Commission take office simultaneously as of the date its composition is completed. For as long as the appointment or election procedures of all five bodies are not yet finalised, the provision foresees that the composition of the Anti-corruption Commission shall be constituted if there are no fewer than three elected, respectively appointed, members. In accordance with Article 7(4) of the Anti-corruption Law, members of the Anti-corruption Commission remain in office until the new Commission is constituted.

Transparency of the process for appointing the management of the Anti-corruption Commission

The transparency of the process for the appointment of the management of the Anti-corruption Commission is supported by the following steps as provided by the Anti-corruption Law.

Parliament

As outlined in Article 8(1), items 1 and 2, of the Anti-corruption Law, proposals for member of the Anti-corruption Commission from the parliamentary quota must be accompanied, among others, by detailed written justifications regarding the professional and moral qualities of the nominees

together with documents proving the requirements for holding the position. Under Article 8(3) of the Anti-corruption Law, the proposals, along with a comprehensive professional biography of the candidates and the documents under Article 8(1) of the Anti-corruption Law, shall be published on the website of the National Assembly along with the name and the reasons of the person who nominated the respective candidate. Under Article 8(5) of the Anti-corruption Law, each candidate shall submit to the specialised committee of the National Assembly responsible for the prevention and countering of corruption (hereafter "specialised committee of the National Assembly"), which prepares the election, a written concept for their work as a member of the Anti-corruption Commission. The concept and the declarations of incompatibility and of assets and interests shall be published on the website of the National Assembly.

Pursuant to Article 8(7) of the Anti-corruption Law, non-profit legal entities registered to carry out public benefit activities, the Supreme Bar Council, higher education institutions and scientific organisations may, no later than 7 days before the hearing, submit to the specialised committee of the National Assembly opinions on the candidates, including questions to be put to them. The mass media may also submit questions to be put to the candidates. The opinions shall be published on the website of the National Assembly within three days of their receipt. The specialised committee of the National Assembly is obliged to ask all submitted questions.

Under Article 8(9) of the Anti-corruption Law, the specialised committee of the National Assembly shall hear each candidate, who shall present before it the concept referred to in paragraph 5. The hearing shall be held at a public meeting of the specialised committee of the National Assembly. A full verbatim record of the hearing shall be prepared, which shall be published on the website of the National Assembly. In light of the opinions received under paragraph 7, the members of the specialised committee of the National Assembly may request additional documents, which the candidates shall be required to submit.

Pursuant to Article 8(10) of the Anti-corruption Law, the specialised committee of the National Assembly shall prepare a detailed and reasoned report on the professional and moral qualities of the candidates, by which it proposes the candidatures for debate and voting in the National Assembly. The report shall also reflect any negative opinions received under Article 8(7) of the Anti-corruption Law and shall contain an opinion on the candidate's presentation, prepared following their hearing before the committee, and a conclusion regarding:

1. the fulfilment of the requirements under Article 7(3) and Article 12(1) of the Anti-corruption Law for holding the position; the presence of any information casting doubt on the moral qualities of the candidate, their qualifications, experience, good reputation and professional qualities;

2. their specific background, qualities and motivation for holding the relevant position.

In accordance with Article 8(11) of the Anti-corruption Law, the report shall be published on the website of the National Assembly.

President

Pursuant to Article 9(2) of the Anti-corruption Law, the detailed professional biography of the person, announced by the President as a candidate for Member of the Anti-corruption Commission, together with the documents for completed higher legal education, the documents regarding their legal experience and career development, the declaration of incompatibility and the declaration of

assets and interests under this Act, and the results of the check conducted to establish and announce affiliation to the State Security and the intelligence services of the Bulgarian People's Army, shall be published on the website of the Administration of the President of the Republic of Bulgaria.

Under Article 9(5) of the Anti-corruption Law, within 14 days of the publication of the documents under paragraph 2, non-profit legal entities registered to carry out public benefit activities, the Supreme Bar Council, higher education institutions and scientific organisations may submit to the Administration of the President opinions on the candidate. The submitted opinions shall be published on the website of the Administration of the President within three days of their submission.

Pursuant to Article 9(6) of the Anti-corruption Law, the Administration of the President of the Republic of Bulgaria shall verify whether the candidate for member of the Anti-corruption Commission meets the requirements of Article 7(3) and Article 12(1) of the Anti-corruption Law, for which a report shall be prepared.

Supreme Courts

Regarding the candidates to be elected by the General Assembly of Judges of the Supreme Court of Cassation and by the General Assembly of Judges of the Supreme Administrative Court, pursuant to Article 10(3) of the Anti-corruption Law, within 3 days of the adoption of rules of procedure, the President of the Supreme Court of Cassation, respectively of the Supreme Administrative Court, shall appoint, on the principle of random selection through electronic allocation, a Competition Committee comprising three judges from the Supreme Court of Cassation, respectively from the Supreme Administrative Court.

Under Article 10(4) of the Anti-corruption Law, proposals for candidates of the Anti-corruption Commission shall be made in writing and shall be reasoned with regard to the personal, professional and moral qualities of the candidate. The written consent of the candidate shall be attached to the proposal. Under Article 10(5) of the Anti-corruption Law, the proposals, together with the reasons thereto and the names of the nominators, shall be published on the website of the Supreme Court of Cassation, respectively of the Supreme Administrative Court, within three days of their receipt.

Under Article 10(6) of the Anti-corruption Law, within 14 days of the publication of the proposals, the candidates shall submit in writing a comprehensive professional biography, their reasons and a concept for the activities of the Anti-corruption Commission, as well as documents demonstrating compliance with the requirements of the law.

Under Article 10(8) of the Anti-corruption Law, the documents under paragraph 6 of the same article shall be published within three days of their submission on the website of the Supreme Court of Cassation, respectively of the Supreme Administrative Court.

Under Article 10(10) of the Anti-corruption Law, the Competition Committee shall rule on the admissibility of each proposal in relation to the requirements of Article 7(3) and Article 12(1) of the Anti-corruption Law, and the submission of the stipulated documents by the candidates within three days of the expiry of the time limit under Article 10(8) of the Anti-corruption Law, and shall publish a list of the admitted and non-admitted candidates. The requirement under Article 12(1), item 1, of the Anti-corruption Law shall be verified ex officio. With the decision on the admissibility of the candidates, the Competition Committee shall schedule a hearing of the candidates and the date of the election by the General Assembly.

Under Article 10(11) of the Anti-corruption Law, the Competition Committee shall hear the candidates. The hearing shall be public and shall be broadcast in real time via the website of the Supreme Court of Cassation, respectively of the Supreme Administrative Court.

Under Article 10(12) of the Anti-corruption Law, judges and non-profit legal entities registered to carry out public benefit activities, the Supreme Bar Council, higher education institutions and scientific organisations may, no later than three days before the hearing, submit to the Competition Committee opinions on the candidate, including questions to be put to them. The mass media may send to the Competition Committee questions for the candidates, to be put to them. Anonymous opinions and reports shall not be considered. The questions shall be communicated to the candidates in writing no later than 24 hours prior to the start of the hearing. The opinions shall be published on the website of the Supreme Court of Cassation, respectively of the Supreme Administrative Court, within three days of their receipt. The Competition Committee shall be obliged to ask all submitted questions.

Under Article 10(13) of the Anti-corruption Law, the General Assembly of the judges at the Supreme Court of Cassation, respectively at the Supreme Administrative Court, shall be public and shall be broadcast in real time via the websites of the two Courts.

Under Article 10(14) of the Anti-corruption Law, the election shall be considered valid if more than half of the judges from the General Assembly of the judges of the Supreme Court of Cassation, respectively the General Assembly of the judges of the Supreme Administrative Court, have voted. Under Article 10(20) of the Anti-corruption Law, the candidate having received more than half of the valid votes shall be considered elected. Under Article 10(21) of the Anti-corruption Law, when no member is elected during the voting pursuant to the procedure of Article 10(20) of the Anti-corruption Law, a second round of voting shall be held. In the second round of voting, the candidate who has received the most votes shall be considered elected. Under Article 10(22) of the Anti-corruption Law, in the event of a tie, the elected candidate shall be determined by the Competition Committee by drawing lots, held in the presence of the interested candidates. Under Article 10(23) of the Anti-corruption Law, the opening of the ballot boxes and the counting of the cast ballot papers shall be public and shall be carried out by the Competition Committee immediately after the conclusion of the voting. Under Article 10(24) of the Anti-corruption Law, a protocol on the results of the election shall be drawn up in duplicate, which shall record the total number of voters, the valid and invalid ballot papers, and the ballot papers cast by name for each candidate. The protocol shall be signed by the members of the Competition Committee. Under Article 10(25) of the Anti-corruption Law, on the basis of the protocol under paragraph 24, the Competition Committee shall issue a decision on the results of the election, which shall include the names of the elected member and the number of votes by which they were elected, and shall be signed by the members of the Competition Committee. The protocol under paragraph 24 shall form an integral part of the decision of the Competition Committee. The decision and the protocols shall be published immediately on the website of the Supreme Court of Cassation, respectively of the Supreme Administrative Court.

Under Article 10(26) of the Anti-corruption Law, the decision of the Competition Committee announcing the result of the election shall be subject to appeal within 3 days of its announcement before a panel determined on the principle of random selection through electronic allocation, as follows:

1. a panel of three judges from the Supreme Court of Cassation, in cases where the decision concerns the election of a member of the Anti-corruption Commission under Article 7(1), item 4;

2. a panel of three judges from the Supreme Administrative Court, in cases where the decision concerns the election of a member of the Anti-corruption Commission under Article 7(1), item 3.

In accordance with Article 10(27) of the Anti-corruption Law, the appeal under paragraph 26 shall not suspend the enforcement of the decision of the Competition Committee. Under Article 10(28) of the Anti-corruption Law, the appeal shall be lodged through the Competition Committee, which immediately shall send the entire file to the respective panel. Pursuant to Article 10(29) of the Anti-corruption Law, the respective panel shall hear the appeal in accordance with the procedure of the Administrative Procedure Code in a public court hearing with summons of the appellant and a representative of the Competition Committee, and shall rule by a decision within 14 days, which shall be final.

Under Article 10(30) of the Anti-corruption Law, the ballot papers shall be stacked and sealed in the ballot box. They shall be kept until the entry into force of the decision by which the Competition Committee rules on the result of the election and shall be destroyed by decision of the President of the Supreme Court of Cassation, respectively of the Supreme Administrative Court, after the newly elected member takes office.

Under Article 10(31) of the Anti-corruption Law, the decision of the Competition Committee and the protocol under paragraph 25 shall be kept for 5 years from the day of the election.

Under Article 10(32) of the Anti-corruption Law, candidates for members of the Anti-corruption Commission may not participate in the Competition Committee, in the voting by the General Assembly, or in the respective panel under paragraph 26.

Supreme Bar Council

Under Article 11(2) of the Anti-corruption Law, proposals for a member of the Anti-corruption Commission may be made by any lawyer within 14 days of the adoption of procedural rules for the election by the Supreme Bar Council.

In accordance with Article 11(3) of the Anti-corruption Law, the proposals made for candidates of the Anti-corruption Commission shall be made in writing to the Supreme Bar Council and shall be reasoned with regard to the personal, professional and moral qualities of the candidate. The written consent of the candidate shall be attached to the proposal.

Pursuant to Article 11(4) of the Anti-corruption Law, the proposals, together with the reasons thereto and the names of the nominators, shall be published on the website of the Supreme Bar Council within three days of their receipt.

Article 11(5) of the Anti-corruption Law stipulates that within 14 days of the publication of the proposals, the candidates shall submit in writing a comprehensive professional biography, their reasons and a concept for the activities of the Anti-corruption Commission, as well as documents demonstrating compliance with the requirements of the law. Under Article 11(7) of the Anti-corruption Law, the documents under paragraph 5 shall be published within three days of their submission on the website of the Supreme Bar Council.

Under Article 11(9) of the Anti-corruption Law , the Supreme Bar Council shall, by a decision, rule on the admissibility of each proposal in relation to the requirements of Article 7(3) and Article 12(1) of the Anti-corruption Law, and the submission of the stipulated documents by the candidates within three days of the expiry of the time limit under paragraph 7, and shall publish a list of the admitted

and non-admitted candidates. With the decision on the admissibility of the candidates, the Supreme Bar Council shall schedule a hearing of the candidates and the date of the election.

In accordance with Article 11(10) of the Anti-corruption Law, lawyers and non-profit legal entities registered to carry out public benefit activities, higher education institutions and scientific organisations may, no later than three days before the hearing, submit to the Supreme Bar Council opinions on the candidate, including questions to be put to them. The mass media may send to the Supreme Bar Council questions to be put to the candidates, . Anonymous opinions and reports shall not be considered. The questions shall be communicated to the candidates in writing no later than 24 hours prior to the start of the hearing. The opinions shall be published on the website of the Supreme Bar Council within three days of their receipt. During the hearing, the Supreme Bar Council shall be obliged to ask all submitted questions.

Under Article 11(11) of the Anti-corruption Law, the Supreme Bar Council shall hear the candidates. The hearing shall be public and shall be broadcast in real time via the website of the Supreme Bar Council. A full record of the hearing shall be prepared, which shall also be published on the website. In light of the opinions received under Article 11(10) of the Anti-corruption Law, the Supreme Bar Council may request additional documents, which the candidates shall be required to submit.

In accordance with Article 11(12) of the Anti-corruption Law, the Supreme Bar Council shall hold the election at its meeting and shall adopt a decision for the election of a member of the Anti-corruption Commission.

Under Article 11(13) of the Anti-corruption Law, the meeting under Article 11(12) of the Anti-corruption Law shall be considered validly held if two thirds of the members of the Supreme Bar Council are present. Decisions shall be taken by a simple majority of the members present. In the event of a tie, the vote of the Chair shall be decisive.

Following Article 11(14) of the Anti-corruption Law, any candidate may contest the lawfulness of the election by lodging an appeal through the Supreme Bar Council before the Supreme Court of Cassation within 3 days of the announcement of the results of the election. Under Article 11(15) of the Anti-corruption Law, the Supreme Court of Cassation shall examine the appeal in open court within 14 days of its submission, sitting in a panel of three judges designated on the principle of random selection through electronic allocation, and shall deliver its judgment within 14 days. Under Article 11(16) of the Anti-corruption Law, where the election is unlawful, the Supreme Court of Cassation shall direct the Supreme Bar Council to hold a new election.

In conclusion, following the assessment of the above-mentioned elements, the pluralistic appointment model involving different institutions and bodies, the clear eligibility and integrity requirements, the publication requirements and the procedural guarantees throughout the selection procedures ensure that the Anti-corruption Law contains provisions that require for the management of the Anti-corruption Commission to be appointed under a transparent process ensuring political independence. These elements also ensure that the adopted legal framework provides for the set-up of a politically independent Anti-corruption body.

- **shall have the authority to investigate and gather evidence, subject to legal safeguards for the rights and freedoms of individuals and businesses.** Furthermore, in line with the description of the measure, **the reform shall […] set up an Anti-Corruption Body with the authority to investigate and gather evidence, subject to legal safeguards for the rights and freedoms of individuals and businesses.**

Authority to investigate and gather evidence […]

Pursuant to Article 3(1) of the Anti-corruption Law, corruption within the meaning of the Anti-corruption Law exists when a person holding a public office under Article 5(1) of the Anti-corruption Law commits a crime under Articles 201, 202(1) and (2), 203(1), 219 (3) and (4), 220, 224, 225b, 225c, 254a, Article 254b(2), Articles 282, 282a, 283, 283a, 283b, Article 294(4) in conjunction with (2), Articles 301, 302, 302a, 304, 304a; 304b, 305, 305a, 307 and Article 387 (3) of the Criminal Code, as well as any other crime committed in connection with the aforementioned. For these cases under paragraph 1, pursuant to Article 3(2), item 2, of the Anti-corruption Law, the countering of corruption among persons holding public office shall be carried out through the investigation of corruption offences.

As explained above, under the new Article 194 of the Criminal Procedure Code for corruption crimes, committed by persons under Article 5(1) of the Anti-corruption Law, the investigation is to be conducted by investigating inspectors from the Anti-corruption Commission. According to Article 27(3) of the Anti-corruption Law, the investigating inspectors conduct investigations in the cases, under the conditions, and pursuant to the procedure provided in the Criminal Procedure Code.

Furthermore, Paragraph 17, item 1, of the Transitional and Final Provisions of the Anti-corruption Law amends Article 52(1), items 2 and 3, of the Criminal Procedure Code to stipulate that the officials of the Anti-corruption Commission, appointed to the position of "investigating inspector," as well as the structures of the Anti-corruption Commission - in the cases provided for in the Criminal Procedure Code - are investigating authorities.

Under Article 203(1) and (2) of the Criminal Procedure Code, the investigating authority, thus the Anti-corruption Commission, is mandated to take all measures to ensure the timely, lawful, and successful conduct of the investigation and is obliged to collect, as soon as possible, the necessary evidence to uncover the objective truth, guided by the law, their inner conviction, and the instructions of the prosecutor.

Furthermore, in accordance with Article 203(5) of the Criminal Procedure Code, the investigating authority also carries out investigative and other procedural actions during the time the case is submitted to the court in connection with a measure of procedural compulsion.

Under Article 15(1), items 2, 3 and 5 of the Anti-corruption Law, the Anti-corruption Commission shall carry out actions for the prevention, detection and investigation of corruption offences by collecting, analysing and verifying information upon or in connection with information concerning acts of corruption by persons holding public office; appoint investigating inspectors, amend and terminate their legal relationships; assist and support the activities of investigating inspectors.

Pursuant to Article 27(1) of the Anti-corruption Law, the investigating inspectors of the Anti-corruption Commission shall conduct investigations in the cases, under the conditions and under the procedure of the Criminal Procedure Code.

Under Article 51(1) of the Anti-corruption Law, the Anti-corruption Commission shall carry out activities for the collection, analysis and verification of information upon or in connection with information regarding corruption offences by persons holding public office, including operational-search activity. Pursuant to Article 51(2) of the Anti-corruption Law, these activities shall be carried out by the authorities under Article 25 of the Anti-corruption Law, i.e. the director of the directorate carrying out the activities under Chapter Six, and the employees therein.

In accordance with Article 52 of the Anti-corruption Law, the authorities under Article 25 of the Anti-corruption Law shall carry out the activities under Article 51 of the Anti-corruption Law by, among others, carrying out operational-search activity. Under Article 53(1) of the Anti-corruption Law, items 1-4, the purposes of operational and search activities include: the prevention, averting, detection and countering of corruption offences under Article 3(1) of the Anti-corruption Law; the verification of information in the discrepancy reports – in the cases under Article 55, item 3, of the Anti-corruption Law; the acquisition of data and information on acts or omissions revealing corrupt conduct, and the provision thereof to the investigating inspectors; the preparation and storage of material means of proof and the provision thereof to the investigating inspectors or to the relevant authorities of the judiciary.

Hence the Anti-corruption Commission has the authority to investigate and gather evidence.

[…] subject to legal safeguards for the rights and freedoms of individuals and businesses

The Anti-corruption Law, in Article 4, sets out a range of principles to be complied with in its implementation, including:

1. legality, transparency, independence, objectivity and impartiality;
2. increased accountability of persons holding public office;
3. respect for and guaranteeing of the rights and freedoms of citizens;
4. proportionality of interference in private and family life;
5. protection of information and of the sources for its acquisition;
6. protection of persons reporting violations;
7. coordination and interaction between state authorities;
8. political neutrality.

Under Article 23(1) of the Anti-corruption Law, candidates for investigating inspectors and designated staff positions such as the Directorate responsible for investigation measures under Chapter VI of the law, must hold a higher education degree and successfully pass an integrity check following a competitive selection process. Pursuant to Article 23(2) of the Anti-corruption Law, these employees, alongside other managerial personnel, are required to consent to periodic and ad-hoc integrity checks during their tenure, limited to a maximum of once per year. Article 23(3) of the Anti-corruption Law mandates that these evaluations be carried out according to rules adopted and published on the Anti-corruption Commission's website, which must include a verification of all circumstances declared under the Act. Finally, Article 23(4) of the Anti-corruption Law establishes that failure to pass an integrity check constitutes formal grounds for dismissal from the position held.

Under Article 27(1) of the Anti-corruption Law, Anti-corruption Commission investigating inspectors conduct investigations in accordance with the Criminal Procedure Code, and Article 27(2) of the Anti-corruption Law restricts their assignments exclusively to criminal investigation activities. Article 27(3) of the Anti-corruption Law specifies that inspectors make decisions based on their inner conviction following an examination of all case circumstances guided by the law, while Article 27(4) of the Anti-corruption Law prohibits superior managers from issuing instructions or interfering in investigations. Finally, Article 27(6) of the Anti-corruption Law mandates that pre-trial proceedings are allocated through an electronic random selection process based on the chronological order of receipt.

Additionally, under Article 54 of the Anti-corruption Law, operational-search activities are carried out with respect for and ensuring the dignity, rights, and fundamental freedoms of citizens.

Pursuant to Article 57(2) of the Anti-corruption Law, the authorities under Article 25 of the Anti-corruption Law must draw up a protocol for every action performed under this Chapter, except when the action is certified by another document.

- shall refer to the Illegal Asset Forfeiture Body cases of significant discrepancies in assets or conflict of interest.

Pursuant to Article 15(1), items 5 and 6, of the Anti-corruption Law, the Anti-corruption Commission shall oversee and adopt decisions regarding the verification and analysis of declarations of assets and interests of persons holding public office, and shall rule on conflict of interest concerning such persons.

In accordance with Article 61(1), items 2 and 4, and (2) of the Anti-corruption Law, individuals holding public positions are required to submit to the Anti-corruption Commission declaration of assets and interests and a declaration of changes in the circumstances in the part concerning interests and the origin of funds in the event of early repayment of obligations and loans.

According to Article 70(1) of the Anti-corruption Law, the Anti-corruption Commission verifies and analyses the information from the declarations, ensuring the accuracy of the declared facts. As stated in Article 72 of the Anti-corruption Law, the verification concludes with a compliance report when no discrepancy is found between declared facts and obtained information. Otherwise, the verification results in a discrepancy report.

Under Article 73(4) of the Anti-corruption Law, in the event of an established discrepancy in an amount of no less than EUR 12 500, the Anti-corruption Commission shall adopt a decision to conduct a verification of the financial position of the person holding public office, and shall notify the Commission for Illegal Asset Forfeiture.

As the notion of ‘ significant discrepancies in assets’ is not defined in the Anti-corruption law, establishing a threshold is necessary to provide for legal certainty and predictability and to set an objective criterion, in this case the threshold of EUR 12 500, according to which cases would be referred to the Commission for Illegal Asset Forfeiture. For similar declarations, the Bulgarian legal framework uses a similar value. Reference is made in particular to the provisions on declarations for assets for judges, prosecutors and investigating magistrates contained in Article 175g(4) of the Justice System Act, which provides that ‘In case of discrepancy between the declared and established facts […] in the amount of not less than BGN 20 000 (approx. EUR 10 226), the Inspectorate at the Supreme Judicial Council sends the report to the competent authorities for carrying out an inspection of the asset status of the person’. This suggests that in the Bulgarian legal system, this is an appropriate amount to justify further investigations necessary to ascertain the reasons for the discrepancy in assets.

Furthermore, when establishing the existence of a conflict of interest, the Anti-corruption Commission adopts a decision pursuant to Article 96 of the Anti-corruption Law. Under Article 103(1) of the Anti-corruption Law, any remuneration received from the legal relationship or act that gave rise to a conflict of interest, for the period during which that conflict of interest was concealed, is to be forfeited to the state or the municipality. Further, under Article 103(2) of the Anti-corruption Law, where it is established that, as a result of a conflict of interest, a person holding public office or a person connected with them has received a material benefit, the equivalent value of that benefit is to be forfeited to the state, unless it is subject to forfeiture on other grounds.

As a result of the above processes, in accordance with Article 108(5) of the Law on the Confiscation of Illegally Acquired Assets, following the identification of a discrepancy and notification by the Anti-corruption Commission in cases under Article 73(4) of the Anti-corruption Law, as well as when a conflict of interest is established by an act in force, the Commission for Illegal Asset Forfeiture initiates proceedings for the confiscation of illegally acquired assets in accordance with Article 107(1) of the Law on the Confiscation of Illegally Acquired Assets.

- shall support the development of integrity checks.

Paragraph 1(7) of the additional provisions of the Anti-corruption Law defines "integrity check" as a verification aimed at ensuring that the person being inspected performs their duties with honesty and integrity, in compliance with the Constitution and laws of the country, and in the interest of citizens and society.

In relation to other state bodies and in accordance with Article 48(1), item 5 of the Anti-corruption Law, the Anti-corruption Commission has the competence of developing methodologies for corruption risk assessment, ethical standards of conduct, and systems for integrity checks, as well as supporting their implementation.

- shall cooperate with the European Public Prosecutor's Office.

Under Article 27(5) of the Anti-corruption Law, when investigating criminal offences falling within the competence of the European Public Prosecutor’s Office, the investigating inspectors are required to maintain close cooperation with the European Delegated Prosecutors, with such cooperation being governed by an agreement between the Chair of the Anti-corruption Commission and the European Delegated Prosecutor authorised by the European Public Prosecutor’s Office under Article 139a(1) of the Justice System Act.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 223 Entry into force of legal act(s) on lobbying activities

Related Measure: C10.R2 Anti-corruption

Qualitative Indicator: Provision in the legal act(s) indicating the entry into force

Time: Q4 2025

1. Context:

The objective of the reform is to further combat corruption at all levels of public administration, justice and prosecution systems. The reform supports anti-corruption mechanisms across public administration, the judiciary, and state-owned enterprises by enhancing oversight, integrity standards, and investigative capacities. It introduces safeguards to improve prosecutorial accountability while reinforcing prevention through ethics guidelines, training, and targeted tools for high-risk positions. The reform also includes legislative measures on whistle-blower protection and lobbying activities.

Milestone 223 consists in the entry into force of legal act(s) regulating lobbying activities in the Republic of Bulgaria. It is the fourth milestone of the reform. It follows the completion of milestone 217 related to the entry into force of the law on the protection of persons reporting breaches or publicly disclosing information on breaches and of the amendments to the legal framework related to whistleblowing, milestone 219 related to improving the role of the Inspectorate within the Supreme Judicial Council in preventing and counteracting corruption in the judiciary, and milestone 222 related to the entry into force of legal act(s) concerning the criminal proceedings and the accountability and criminal liability of the Prosecutor General. It is accompanied in this payment request by milestone 218 related to the entry into force of legal act(s) providing for the set-up of an Anti-corruption body. It will be followed by milestones 220 related to the Anti-Corruption body set up and operational and 226a related to measures to counter corruption and increase integrity.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled
2	Law on the transparency in interest representation, adopted on 19 March 2026 and published in the State Gazette on 27 March 2026	Legal act regulating lobbying activities in the Republic of Bulgaria.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Legal act(s) on lobbying activities in the Republic of Bulgaria shall enter into force.

The Council Implementing Decision required entry into force of legal act(s) on lobbying activities in the Republic of Bulgaria. The Law on the transparency in interest representation, which regulates lobbying activities (hereinafter referred to as the "Lobbying law"), was adopted on 19 March 2026 and published in the State Gazette on 27 March 2026 (evidence No. 2). Following Article 5(5) of the Bulgarian Constitution, the Lobbying law entered into force three days after promulgation in the State Gazette, namely on 31 March 2026. However, according to Paragraph 8 of the Transitional and Final provisions of the Lobbying law some specific provisions of this law enter into force nine months after the publication in the State Gazette. This delayed entry into force concerns the following provisions: Article 7(4) related to procedures for holding face-to-face meetings with interest representatives; Article 8(5) related to calendar of meetings held with interest representatives on the relevant institution's website, Article 9 related to legislative footprint, and Articles 12–23 related to the Transparency Register and administrative fines. The entry into force of these provisions will therefore take place on 27 December 2026. Whilst this constitutes a minimal temporal deviation from the requirement of the Council Implementing Decision, the delay between the publication of this law and the actual application of the provisions is considered both limited and proportional, notably because the delay is necessary to ensure that the information systems of the relevant institutions are technically equipped to support procedures relating to in-person meetings with interest representatives (Article 7(4)), to the maintenance of a meetings calendar (Article 8(5)), to the legislative footprint (Article 9), and to the establishment of the Transparency Register (Articles 12-20). Moreover, the entry into force of these provisions on 27 December 2026 is automatic and no further action is required from Bulgaria in view of their entry into force, which ensures the certainty of application of the Lobbying law. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

The Lobbying law establishes a legal framework regulating lobbying activities in the Republic of Bulgaria with the aim to ensure transparency, integrity, and equal access in interactions with public authorities (Articles 1 and 2). It defines lobbying (interest representation) (Article 3), sets out binding principles such as openness, accountability, and traceability of contacts (Articles 6–10), introduces a mandatory transparency register for lobbyists (Articles 12–20), and establishes rules on disclosure, ethical conduct, and sanctions (Articles 10, 14 and 22).

Furthermore, in line with the description of the measure, **the reform shall include legislative measures […] to regulate lobbying activities in the context of public decision-making.**

Article 5 of the Lobbying law provides that the law applies to the representation of interests before:

(i) the National Assembly, Members of the National Assembly, experts and advisers to parliamentary committees and parliamentary groups;
(ii) the President and the Vice-President of the Republic of Bulgaria, their advisers and secretaries;
(iii) the Council of Ministers, the Prime Minister, the Deputy Prime Ministers, Ministers, Deputy Ministers and members of the political cabinets, including their advisers and experts;

(iv) the regional governors;
(v) the mayors, chairmen of municipal councils and municipal councillors;
(vi) the heads and members of other public institutions who have the power to adopt or issue normative and general administrative acts in certain areas.

As the scope of the law covers interest representation before all public institutions at both national and local levels involved in public decision-making (as listed in Article 5), with powers to take decisions on laws, secondary legislation and other normative and general administrative acts, the Lobbying law regulates the lobbying activities in the context of public decision-making.

4. Commission Preliminary Assessment: Satisfactory fulfilled

Number and name of the Milestone: 258 Upgrade of the Unified Courts Information System

Related Measure: C10.I1 Strengthening, further developing and building on the Unified Information System of Courts

Qualitative Indicator: Upgraded Unified Information System of Courts

Time: Q4 2025

1. Context:

The objective of this investment is to increase the digitalisation in the justice system.

The investment consists in the upgrade of the Unified Information System of Courts.

Milestone 258 requires the upgrade of the Unified Courts Information System by the addition of (i) a module for the allocation and digitalisation of cases for order for payment proceedings and (ii) a module for the administration of mediation procedures. Furthermore, 3 000 computers with monitors and 2 200 laptops must be delivered and data storage hardware must be installed at two core data centres and at one archive data centre.

Milestone 258 is the only milestone of this investment.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	Acceptance protocol under Contract No SJC-10823/28.08.2024 concerning 'Design, development and implementation in the Unified Courts Information System of the module 'Centralised allocation and electronic processing of order for payment cases integrated with the Unified Portal for Electronic Justice'	Acceptance protocol for the implementation of Stage 5 "Deployment" of a module for the allocation and digitalisation of cases for order for payment proceedings in the Unified Courts Information System, signed by Information Services AD (contractor) and Supreme Judicial Council (contracting agency) on 30 June 2025

3	Protocol No 18 of the remote meeting by videoconference of the plenum of the Supreme Judicial Council	Protocol including minutes of the remote meeting by videoconference of the plenum of the Supreme Judicial Council held on 26 June 2025, approved by the Secretary-General of the Supreme Judicial Council pursuant to Order No SJC 9849/13.6.2025 (26.6.2025), and approving the implementation of the module "centralised allocation and electronic processing for order for payment cases" integrated with the Unified Portal for Electronic Justice as of 1 July 2025.
4	Deployment protocol under Contract No BCC-8637/15.5.2025 concerning the 'Design, development and implementation of the Mediation Module and its integration with the existing modules of the Unified Court Information System'	Deployment protocol for the development and integration of a mediation module, signed between Information Services AD (contractor) and Supreme Judicial Council (contracting agency) on 1 December 2025
5	Protocol of acceptance testing under Contract No BCC-8637/15.5.2025 concerning 'Design, development and implementation of the Mediation Module and its integration with the existing modules of the Unified Court Information System'	Protocol certifying, after acceptance testing, the development and integration within the Unified Court Information System of a mediation module, signed between Information Services AD (contractor) and Supreme Judicial Council (contracting agency) on 1 December 2025
6	Final acceptance protocol on the 'Supply of computer configurations for use by the courts' under Contract No SJC - 10197	Final acceptance protocol on the 'Supply of computer configurations for use by the courts' under Contract No SJC -10197, signed between Kontrax AD (contractor) and Supreme Judicial Council (contracting authority) on 25 October 2024
7	Final acceptance protocol on the 'Supply and warranty support of 2200 mobile computers (laptops) for the needs of the courts' under Contract No VSC-10 330/1.8.2024	Final acceptance protocol on the 'Supply and warranty support of 2200 mobile computers (laptops) for the needs of the courts' under Contract No VSC-10 330/1.8.2024, signed between Lirex BG OD (contractor) and the Supreme Judicial Council (contracting authority) on 31 October 2024.
8	Contract No SJC - 15840/22.12.2023 including its Annex I "Technical specifications of the contracting	Contract No SJC-15840/22.12.2023 on upgrading of the data centres in the SJC the signed between the Supreme Judicial Council and CNSYS AD on 22 December 2023

	authority”	
9	Acceptance protocol of 17.6.2024 for Sofia, 90 Cherkovna Street	Acceptance protocol for the implementation of Contract No SJC-15840/22.12.2023 subject: ‘Upgrading of the data centres of the SJC’, signed between CNSYS AD (contractor) and the Supreme Judicial Council (contracting authority) on 17.6.2024 concerning the installation of equipment at Sofia, 90 Cherkovna Street
10	Acceptance protocol of 18.6.2024 for address Sofia, 23 Blvd. Gen. Skobelev	Acceptance protocol for the implementation of Contract No SJC-15840/22.12.2023 subject: ‘Upgrading of the data centres of the SJC’, signed between CNSYS AD (contractor) and the Supreme Judicial Council (contracting authority) on 18.6.2024 concerning the installation of equipment at Sofia, 23 Blvd. Gen. Skobelev
11	Acceptance protocol of 19.6.2024 for address Sofia, 12 Ekzarh Josef Street	Acceptance protocol for the implementation of Contract No SJC-15840/22.12.2023 subject: ‘Upgrading of the data centres of the SJC’, signed between CNSYS AD (contractor) and the Supreme Judicial Council (contracting authority) on 19.6.2024 concerning the installation of equipment at Sofia, 12 Ekzarh Josef Street
12	Final acceptance protocol for the implementation of Contract No SJC-15840/22.12.2023 subject: ‘Upgrading of the data centres of the SJC’	Final acceptance protocol for the implementation of Contract No SJC-15840/22.12.2023 subject: ‘Upgrading of the data centres of the SJC’, signed between CNSYS AD (contractor) and the Supreme Judicial Council (contracting authority) on 26 June 2024
13	Letter from CNSYS AD to the Supreme Judicial Council of 21 May 2024 concerning contract SJC-15840/22.12.2023	Letter from CNSYS AD (contractor) to the Supreme Judicial Council (contracting authority) of 21 May 2024, concerning contract SJC-15840/22.12.2023, proposing a distribution of equipment among three data centres
14	Letter from the Supreme Judicial Council to CNSYS AD of 22 May 2024 concerning contract SJC-15840/22.12.2023	Letter from the Supreme Judicial Council (contracting authority) to CNSYS AD (contractor) of 22 May 2024, concerning contract SJC-15840/22.12.2023, accepting the proposed distribution of equipment among three data centres
15	Interim report on contract No. SJC-15840/22.12.2023 for the period 12.06.2024-25.6.2024	Interim report on contract No. SJC-15840/22.12.2023 for the period 12.06.2024-25.6.2024, signed by CNSYS AD (contractor) and the Supreme Judicial Council (contracting authority) on 26 June 2024
16	System project on contract No. SJC-15840/22.12.2023	System project on contract No. SJC-15840/22.12.2023 ‘Upgrading of the data centres of the SJC’, digitally signed by CNSYS AD (contractor) and the Supreme Judicial Council (contracting authority) on 13 June 2024

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Upgrade of the Unified Courts Information System by the addition of the following modules shall be issued:

- a module for the allocation and digitalisation of cases for order for payment proceedings;

Bulgaria submitted an acceptance protocol for stage 5 "Deployment" under Contract No SJC-10823/28.08.2024 "Design, development and implementation in the Unified Courts Information System of the module 'Centralised allocation and electronic processing of order for payment cases' integrated with the Unified Portal for Electronic Justice", signed by Information Services AD as the contractor and the Supreme Judicial Council as the contracting authority on 30 June 2025 (evidence no. 2). The above-mentioned acceptance protocol confirms the acceptance by the contracting authority of the contractor's work under Stage 5 "Deployment".

Bulgaria also submitted Protocol No 18 of the remote meeting by videoconference of the plenary of the Supreme Judicial Council held on 26 June 2025 containing minutes of that meeting, approved by the Secretary-General of the Supreme Judicial Council pursuant to Order No SJC 9849/13.6.2025 (26.6.2025). According to the minutes, at the remote meeting by videoconference of the plenary of the Supreme Judicial Council held on 26 June 2025, the plenary of the Supreme Judicial Council approved under item 33 of the agenda the implementation of the module "centralised allocation and electronic processing for order for payment cases" integrated with the Unified Portal for Electronic Justice as of 1 July 2025 (evidence no. 3).

The Commission services conducted an on-the-spot-check on 1 June 2026 to verify that the module for the allocation and digitalisation of cases for order for payment proceedings has been added to the Unified Courts Information System (hereinafter referred to as: "the UCIS"). This check was completed successfully, confirming that order for payment cases can be filed digitally through the e-justice portal as the front-end-system and are allocated automatically to judges through the UCIS. Specifically, the module allows for a registered user to file an application for order for payment through the e-justice portal, which is the front-end system, by entering information on the claim, including the claimed amount and the applicable interest rate, in the relevant field and attaching the supporting evidence for the claim. The module allows applicants to view the full application in .pdf format before signing it and submitting it through the e-justice portal. The application for order for payment is then allocated through the UCIS to a judge through random allocation with an algorithm, which takes into account the workload of judges. The module "centralised allocation and electronic processing for order for payment cases" allows the responsible judge to issue payment orders and writs of execution in line with the procedures under Articles 409a - 425 of the Bulgarian Civil Procedure Code through the UCIS. In particular, the module allows to prepare payment orders electronically, based on a template that is automatically filled with the information included in the digital case file, which can then be signed electronically by the judge. Once payment orders are issued, they become available to the applicant through the e-justice portal. All documents and information on the order for payment cases are stored in a record file in the UCIS. Court executors have access to the record file in the UCIS and can record information on the payments made and amounts received by the applicant in execution of the payment order. Furthermore, this information is made available to the applicants.

- a module for the administration of mediation procedures.
Bulgaria submitted a deployment protocol under Contract No BCC-8637/15.5.2025 concerning the "Design, development and implementation of the Mediation Module and its integration with the existing modules of the Unified Court Information System", signed by Information Services AD as the contractor and the Supreme Judicial Council as the contracting authority on 1 December 2025 (evidence no. 4) (hereinafter referred to as: "the deployment protocol for the mediation module"). The deployment protocol for the mediation module indicates that the module was integrated with the existing modules of the UCIS and entered into effective operation on 27 November 2025.

Bulgaria also submitted a protocol of acceptance testing under Contract No BCC-8637/15.5.2025 concerning "Design, development and implementation of the mediation module and its integration with the existing modules of the Unified Court Information System" (hereinafter referred to as "the testing protocol", evidence no. 5). The testing protocol was signed by Information Service AD as the contractor and the Supreme Judicial Council as the contracting agency on 1 December 2025. The testing protocol confirms that the acceptance testing was conducted and the mediation module was developed and integrated with the existing modules of the UCIS in accordance with the requirements of the contracting authority's technical specifications.

The Commission services conducted an on-the-spot check on 1 June 2026 to verify that the module for the administration of mediation procedures has been added to the UCIS. This check was completed successfully, confirming that the module added to the UCIS allows for the possibility to administer mediation cases. Once a court decides that the parties in a case shall be obliged to participate in an information meeting on the mediation procedure, the administration of the court initiates the process in UCIS through the mediation module, and enters the case information, including the case number, participants, date of initiation, as well as documents such as evidence to UCIS. Following the initiation of the mediation process in UCIS, the administration of the relevant mediation centre has to administer the case through the following actions: selecting a mediator to the case, reporting information on mediation meetings, attaching further documents, editing information on the results of the mediation. Once the mediator carries out the first information meeting on the mediation procedure, as well as subsequent mediation meetings, if agreed by the parties, the protocols of these meetings are uploaded in UCIS. The mediation module also allows to generate reports on mediation cases. The module also allows to encode and access information on the mediators such as the type of mediation proceedings they specialise in, years of experience, and educational qualifications.

3 000 computers with monitors and 2 200 laptops shall be delivered.

The Council Implementing Decision requires that "3000 computers with monitors […] shall be delivered".
Bulgaria submitted a final acceptance protocol on the "Supply of computer configurations for use by the courts" under Contract No SJC-10197. The final acceptance protocol was signed between Kontrax AD as the contractor and the Supreme Judicial Council as the contracting authority on 25 October 2024 (evidence no. 6). The final acceptance protocol lists the deliveries made to each court, specifying the number of computers and monitors, their serial number and the delivery date (evidence no. 6, pages 2 – 94). According to the final acceptance protocol, the deliveries were made between 10 October 2024 and 23 October 2024. Based on the serial numbers listed, the final acceptance protocol certifies the delivery of 2960 computers with monitors to Bulgarian courts (evidence no. 6, pages 2 – 94). Whilst this constitutes a minimal numerical deviation of 1.3% from

the requirement of the Council Implementing Decision, the overall objective of this milestone is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Furthermore, the final acceptance protocol confirms that the contractor has fulfilled its commitments regarding the delivery of the technical equipment under Contract No SJC-10197 of 29.7.2024.

Bulgaria submitted a final acceptance protocol on the 'Supply and warranty support of 2200 mobile computers (laptops) for the needs of the courts' under Contract No VSC-10 330/1.8.2024, signed between Lirex BG OD as the contractor and the Supreme Judicial Council as the contracting authority on 31 October 2024 (evidence no. 7). The final acceptance protocol certifies the delivery of 2 200 laptops to Bulgarian courts. The final acceptance protocol also lists the deliveries made to each court, specifying the number of laptops delivered and their serial numbers. Furthermore, the final acceptance protocol confirms that the supply was carried out in line with the contract in terms of quality and timeline, being accepted by the Supreme Judicial Council without comments.

Data storage hardware shall be installed at two core data centres and at one archive data centre.
In line with the technical specifications set out in Annex I to Contract No SJC-15840/22.12.2023, the data storage hardware was to be delivered and installed at two available data centres of the Supreme Judicial Council and at one archive data centre to be developed in a new location as part of the project (evidence no. 8, Annex I, page 7).

Bulgaria submitted the following acceptance certificates:

- Acceptance protocol of 17.6.2024 for Sofia, 90 Cherkovna Street (evidence no. 9), which certifies the acceptance of the installation and configuration of IT infrastructure to Sofia, 90 Cherkovna Street, including data storage hardware such as storage infrastructure to scale out the Network Attached Storage (hereinafter referred to as "NAS") system such as storage nodes (Dell PowerScale H700 nodes), as well as hardware to upgrade the hyper-converging infrastructure (hereinafter referred to as "HCI") cluster, such as Dell VxRAIL S670 nodes;
- Acceptance protocol of 18.6.2024 for address Sofia, 23 Blvd. Gen. Skobelev (evidence no. 10), which certifies the acceptance of the installation and configuration of IT infrastructure to Sofia, 23 Blvd. Gen. Skobelev, including data storage hardware such as storage infrastructure to scale out the Network Attached Storage (hereinafter referred to as "NAS") system such as storage nodes (Dell PowerScale H700 nodes), as well as hardware to upgrade the hyper-converging infrastructure (hereinafter referred to as "HCI") cluster, such as Dell VxRAIL S670 nodes,
- Acceptance protocol of 19.6.2024 for address Sofia, 12 Ekzarh Josef Street (evidence no. 11), which certifies the acceptance of the installation and configuration of IT infrastructure to Sofia, 12 Ekzarh Josef Street, including data storage hardware such as a data backup dedicated disk array (Dell PowerProtect DD6900).

Bulgaria also submitted a final acceptance protocol for the implementation of Contract No SJC-15840/22.12.2023 subject: "Upgrading of the data centres of the SJC", signed between CNSYS AD as the contractor and the Supreme Judicial Council as the contracting authority on 26 June 2024 (evidence no. 12). The final acceptance protocol confirms the acceptance without remarks and within the deadline of the full implementation of all activities under the contract, including delivery, installation and configuration of data storage hardware in three data centres of the Supreme Judicial Council, as attested by individual acceptance protocols, including those concerning installation listed above (evidence no. 9, 10, 11). According to the final acceptance protocol, the data storage hardware was delivered and installed at the three different addresses: Sofia, 23 Blvd. Gen. Skobelev,

Sofia, 12 Ekzarh Josef Street and Sofia, 90 Cherkovna Street, in accordance with Articles 12(1) and (2) of contract No SJC-15840/22.12.2023. Article 12(1) and (2) of the above-mentioned contract indicates that the handover and acceptance of the equipment, and of the installation, configuration of the IT infrastructure covered by the contract shall take place at the places referred to in Article 6(1) of the same contract. Article 6(1) provides that the places/addresses where the delivery obligation is to be met shall be provided after notification by the contractor of the availability of the delivery date.

The distribution of the equipment to be supplied under contract No SJC-15840/22.12.2023 concerning "Upgrading of the data centres of the SJC" was proposed by CNSYS AD as the contractor by letter of 21 May 2024 (evidence no. 13). By that letter, CNSYS AD proposed to distribute the equipment under the contract to three locations: Sofia, 23 Blvd. Gen. Skobelev and Sofia, 90 Cherkovna Street, and Sofia, 12 Ekzarh Josef Street. The distribution of the equipment as per the proposal by CNSYS AD was approved by the Supreme Judicial Council by letter of 22 May 2024 (evidence no. 14).

Bulgaria submitted the interim report on contract No. SJC-15840/22.12.2023, signed by the SJC as the contracting authority and CNSYS AD as the contractor on 26 June 2024 (evidence no. 15). The interim report confirms that approval of the System Project (evidence no. 16) was obtained during the period covered by the interim report (evidence 15, page 4). The System project on contract No. SJC-15840/22.12.2023 'Upgrading of the data centres of the SJC', digitally signed by CNSYS AD as the contractor and the SJC as the contracting authority on 13 June 2024 (evidence no. 16) indicates that the delivery addresses Sofia, 23 Blvd. Gen. Skobelev, Sofia, 90 Cherkovna Street and Sofia, 12 Ekzarh Josef Street correspond to data centres (evidence no. 16, page 69).

The addresses used for the delivery and installation of hardware as set out in the final acceptance protocol (evidence no. 12) correspond to the addresses agreed between the SJC as the contracting authority and CNSYS AD as the contractor via letters (evidence no. 13 and 14) pursuant to Articles 12(1) and (2), and 6(1) of contract No SJC-15840/22.12.2023 (evidence no. 8).

Regarding the archive data centre, the technical specifications require building a backup system and explain that in order to optimise the overall infrastructure and efficient use, the delivery of a specialised archive solution is needed. This will allow the information to be split into active and archival information: active information is stored on the productive systems (computational cluster) and archive information will be stored on a specialised device (evidence no. 8, Annex I, page 12). The type of equipment supplied (evidence no. 11), is in line with the technical specifications requiring the set up of building a backup system and a specialised archive solution, and supports that the data centre located in Sofia, 12 Ekzarh Josef Street qualifies as an archive data centre. Indeed, in line with the technical specifications, the data storage hardware installed includes specialised data storage hardware designed for storing data backups.

Regarding the two available data centres, the technical specifications explain that the hardware that supports backup work of the centralised web-based system is located in two remote data centres, connected to each other by a high-speed connection and providing the necessary redundancy (evidence no. 8, Annex I, page 4). A HCI is installed at those data centres, providing the necessary reliability and redundancy, and ensuring continuity of business processes. The HCI cluster consists of two parts located at the two locations, centrally managed and working as a single solution, providing the necessary computing and disk capacity to virtual machines, as well as their network connectivity. This allows the operation of virtual machines on any single node, no matter in which computing centre it is located. The information on each virtual machine has copies in both data centres to protect it even when a complete location is lost (evidence no. 8, Annex I, page 4). According to the

technical specifications, as part of the investment, new server nodes are added to the computational cluster, and its capacity is expanded (evidence no. 8, Annex I, page 26). This was done by installing equipment to upgrade the existing HCI cluster (evidence no. 9 and 10). Because of the used HCI technology solution, and a clear differentiation of this computational cluster storing active information from the archive solution corresponding to the archive data centre, the data centres located in Sofia, 23 Blvd. Gen. Skobelev and Sofia, 90 Cherkovna Street, are regarded as core data centres as they serve as the core operational sites of the data centre architecture.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Number and name of the Milestone: 260 Information modules and hardware for the digitalisation of litigation processes in administrative justice

Related Measure: C10.I2 Digitalisation of key litigation processes in administrative justice

Qualitative Indicator: Information modules introduced; hardware for remote hearings and for data storage delivered

Time: Q4 2025

1. Context:

The objective of this investment is to increase the digitalisation of proceedings before the administrative courts. The investment consists in the upgrade of the Single Case Management Information System.

Milestone 260 requires the issuance of acceptance protocol(s) of the upgrade of the Single Case Management Information System by adding information modules providing for the possibility: (i) to electronically access case materials and submit documents; (ii) for electronic service of summons; and (iii) to hold remote hearings. Furthermore, acceptance protocol(s) of the delivery of hardware to the country's administrative courts for remote court hearings and of the installation of the data storage hardware in a data centre of the Supreme Judicial Council should be issued.

Milestone 260 is the only milestone of this investment.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements, as set out in the description of the target and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	Final acceptance protocol in connection with the implementation of Contract No 88/10.12.2024 for the 'Development and implementation of a module for Reconciling the Single Case Management Information System (SCMIS) with the electronic portal for summoning of the Supreme Judicial Council and that of the Ministry of Electronic Governance for the parties in administrative cases and for	Final acceptance protocol for the receipt of the developed and implemented information modules for digital remote submission and receipt of electronic documents and a module for an electronic portal for summoning under contract No 88/10.12.2024, signed on 4 July 2025 by the Supreme Administrative Court (contracting authority) and DZZD Smart Sirma (contractor).

	the development and implementation of an information module enabling parties and their legal representatives to submit and receive electronic documents in court cases digitally remotely'	
3	Acceptance protocol for the activities under Art. 1 of Contract No 87/10.12.2024 'Delivery of equipment and implementation of an information module for remote hearings'	Acceptance protocol for the delivery of equipment and implementation of an information module for remote hearings, signed 29 May 2025 by the Supreme Administrative Court (contracting agency) and the DZZD Conference Team (contractor).
4	Acceptance protocol under Contract No 87/10.12.2024 'Delivery of equipment and implementation of an information module for remote hearings'	Acceptance protocol for the implementation of an information module for remote hearings, signed 16 May 2025 by the Administrative Court (contracting agency) and the DZZD Conference Team (contractor).
5	Acceptance Protocol under contract No 62/11.09.2025 concerning the 'Purchase and deployment of data storage hardware in a data centre of the Supreme Judicial Council'	Acceptance Protocol for the purchase and implementation of data storage hardware in a data centre of the SJC, signed on 21 November 2025 by the Supreme Administrative Court (contracting agency) and Sirma Group Holding AD (contractor).
6	Acceptance protocol under Contract No 62 of 11.9.2025 concluded between the Supreme Administrative Court, as contracting authority, and Sirma Group Holding AD as the contractor, in performance of a public contract with subject 'Purchase and deployment of data storage hardware in a data centre for SJC'	Acceptance protocol under Contract No 62 of 11.9.2025 signed on 20 November 2025 by the Supreme Administrative Court (contracting authority), and Sirma Group Holding AD (contractor).

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Acceptance protocol(s) of the upgrade of the Single Case Management Information System by adding information modules providing for the possibility:

(i) to electronically access case materials and submit documents;

The Council Implementing Decision states “Acceptance protocol(s) of the upgrade of the Single Case Management Information System by adding information modules providing for the possibility: (i) to electronically access case materials and submit documents”. The Council Implementing Decision also states in the name of the milestone “Information modules and hardware for the digitalisation of litigation processes in administrative justice” and in the qualitative indicator “Information modules introduced; hardware for remote hearings and for data storage delivered”. In light of the contextual interpretation of this requirement from the Council Implementing Decision, it is interpreted that the acceptance protocol(s) are required to confirm the addition of the information module to upgrade the Single Case Management Information System.

Bulgaria submitted a final acceptance protocol in connection with the implementation of Contract No 88/10.12.2024 for the ‘Development and implementation of a module for reconciling the Single Case Management Information System (hereinafter referred to as: “the SCMIS”) with the electronic portal for summoning of the Supreme Judicial Council and that of the Ministry of Electronic Governance for the parties in administrative cases and for the development and implementation of an information module enabling parties and their legal representatives to submit and receive electronic documents in court cases digitally and remotely’ dated 4 July 2025 (evidence no. 2) (hereinafter referred to as: “the acceptance protocol on the implementation of information modules”). The acceptance protocol on the implementation of information modules was signed on 4 July 2025 by the Supreme Administrative Court as the contracting authority and Smart-Sirma DZZD as the contractor. It certifies the acceptance on the part of the Supreme Administrative Court of activities carried out to develop and implement an information module to enable digitally remote submission and receipt of electronic documents in court cases by the parties and their legal representatives for the needs of the administrative courts, as a result of Action 2 of the project.

The Commission services conducted an on-the-spot check on 28 May 2026 to verify that the information module added to the SCMIS provides for the possibility to electronically access case materials and submit documents. This check was completed successfully, confirming that the information module added to the SCMIS provides for the possibility to electronically access case materials and submit documents through the e-justice portal as the front-end-system. Specifically, parties can access the electronic case file, which contains all documents and materials included in the case file, once the responsible court confirms in SCMIS that he or she is a party to the proceeding or a legal representative which will qualify he or she as an authorised person to electronically access case materials). As regards the submission of documents, the check confirmed that the new module allows parties to submit documents electronically. This includes submitting the following categories of documents: a request to initiate a new case and a request to re-initiate the case pleas. The new module also allows for filing documents on an existing case.

This is in line with the contextual interpretation that the acceptance protocol(s) were required to confirm the addition of the information module to upgrade the Single Case Management Information System, while the functionalities of the information module, related to the possibility to electronically access case materials and submit documents, were confirmed through the on-the-spot check conducted by the Commission on 28 May 2026. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

(ii) for electronic service of summons;

The Council Implementing Decision states “Acceptance protocol(s) of the upgrade of the Single Case Management Information System by adding information modules providing for the possibility: […] (ii) for electronic service of summons”. The Council Implementing Decision also states in the name of

the milestone “Information modules and hardware for the digitalisation of litigation processes in administrative justice” and in the qualitative indicator “Information modules introduced; hardware for remote hearings and for data storage delivered”. In light of the contextual interpretation of this requirement from the Council Implementing Decision, it is interpreted that the acceptance protocol(s) are required to confirm the addition of the information module to upgrade the Single Case Management Information System.

The acceptance protocol on the implementation of information modules (evidence no. 2) also certifies the acceptance of the development and implementation of an information module to reconcile the SCMIS with the electronic summons portal hosted by the Supreme Judicial Council and the Secure Electronic Delivery System hosted by the Ministry of Electronic Governance for the parties in administrative cases, as a result of Action 1 of the project.

The Commission services conducted an on-the-spot check on 28 May 2026 to verify that the information module added to the SCMIS provides for the electronic service of summons. This check was completed successfully, confirming that the information module added to the SCMIS provides for the electronic service of summons. Specifically, summonses are delivered through the e-justice portal which serves as the front-end system and is connected to the SCMIS through the implemented information module. In accordance with national legislation, summonses are considered served after seven days of its delivery, when the service is done in electronic form (Article 137(3) in connection with Article 18a(4) of the Administrative Procedure Code). Through the e-justice portal, parties can download a report in .pdf format, including the technical proof and date/time of delivery and the summons signed by a clerk, and to pay the court fee for specific cases as verified by Commission services.

This is in line with the contextual interpretation that the acceptance protocol(s) were required to confirm the addition of the information module to upgrade the Single Case Management Information System, while the functionalities of the information module, related to the possibility for electronic service of summons, were confirmed through the on-the-spot check conducted by the Commission on 28 May 2026. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

(iii) to hold remote hearings.

The Council Implementing Decision states “Acceptance protocol(s) of the upgrade of the Single Case Management Information System by adding information modules providing for the possibility: […] (iii) to hold remote hearings”. The Council Implementing Decision also states in the name of the milestone “Information modules and hardware for the digitalisation of litigation processes in administrative justice” and in the qualitative indicator “Information modules introduced; hardware for remote hearings and for data storage delivered”. In light of the contextual interpretation of this requirement from the Council Implementing Decision, it is interpreted that the acceptance protocol(s) are required to confirm the addition of the information module to upgrade the Single Case Management Information System.
Bulgaria submitted an acceptance protocol dated 29 May 2025 for the activities under Article 1 of Contract No 87/10.12.2024 ‘Delivery of equipment and implementation of an information module for remote hearings’, which was signed by the Supreme Administrative Court as the contracting authority and Smart-Sirma DZZD as the contractor (evidence no. 3). It certifies that all the activities under the contract had been successfully delivered to the contracting authority and that the contracting authority accepts them without comments.

The above-mentioned acceptance protocol follows a previous acceptance protocol under Contract 87/10.12.2024, dated 16 May 2025 and signed between the Supreme Administrative Court as the contracting authority and Smart-Sirma DZZD as the contractor (evidence no. 4) which certifies that the developed and implemented information module for conducting remote court hearings successfully passed all tests and has been successfully placed in a production environment.

The Commission services conducted an on-the-spot check on 28 May 2026 to verify that the information module provides for the possibility to hold remote hearings. This check was completed successfully, confirming that the information module provides for the possibility to hold remote hearings. Commission services verified a list of carried out remote hearings in the module, which included details about the case, year, court, as well as start and end time of the remote hearing. Recordings of the hearings automatically integrated in the relevant electronic case files in the SCMIS.

This is in line with the contextual interpretation that the acceptance protocol(s) were required to confirm the addition of the information module to upgrade the Single Case Management Information System, while the functionalities of the information module, related to the possibility to hold remote hearings, were confirmed through the on-the-spot check conducted by the Commission on 28 May 2026. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Acceptance protocol(s) of the delivery of hardware to the country's administrative courts for remote court hearings shall be issued.

The acceptance protocol dated 29 May 2025 for the activities under Article 1 of Contract No 87/10.12.2024 'Delivery of equipment and implementation of an information module for remote hearings' , which was signed by the Supreme Administrative Court as the contracting authority and Smart-Sirma DZZD as the contractor (evidence no. 3), certifies the acceptance of the delivery of hardware for remote hearings by the Supreme Administrative Court pursuant to Article 1 of Contract 87/10.12.2024.

Enclosed to the acceptance protocol is the final report on the delivery of equipment and implementation of an information module for the establishment of remote hearings, signed by the contracting authority and the contractor on 29 May 2025. The final report specifies the delivery of hardware for remote court hearings to the 29 administrative courts in Bulgaria (including the Supreme Administrative Court), such as displays, scanners and uninterruptable power supply, videoterminals, cameras, microphones, microphones receivers, charging stations for wireless microphones, laptops, stands (evidence 3, pages 18- 25). Furthermore, the report indicates that the equipment was installed, deployed and tested in all 29 courts in Bulgaria (including the Supreme Administrative Court) (evidence 3, pages 26 – 33).

Acceptance protocol(s) of the installation of the data storage hardware in a data centre of the Supreme Judicial Council shall be issued.

Bulgaria submitted an acceptance protocol under Contract No 62 of 11.9.2025 concluded between the Supreme Administrative Court, as contracting authority, and Sirma Group Holding AD as the contractor, pursuant to public procurement procedure 'Purchase and deployment of storage hardware in a data centre of the SJC', under the project 'Digitalisation of key judicial processes in the administrative justice system', approved under Component 2.D.1 Business environment, Reform 1 Accessible, effective and predictable justice ", by the National Recovery and Resilience Plan of the Republic of Bulgaria (evidence no. 5). The acceptance protocol was signed by the Supreme

Administrative Court, as the contracting authority, and Sirma Group Holding AD as the contractor on 21 November 2025. The acceptance protocol certifies the acceptance and confirms the performance of all activities under contract No. 62/11.09.2025 'Purchase and deployment of data storage hardware in a data centre of the Supreme Judicial Council'.

The above-mentioned acceptance protocol follows a previous acceptance protocol under Contract No 62 of 11.9.2025 concluded between the Supreme Administrative Court, as contracting authority, and Sirma Group Holding AD as the contractor, in performance of a public contract with subject 'Purchase and deployment of data storage hardware in a data centre for SJC', certifying the acceptance of the final report produced by the contractor, which is enclosed (evidence no. 6).

The final report provides a description of all activities conducted in execution of the contract, including delivery and installation of the equipment. The final report indicates that "all the technical equipment necessary for the implementation of the project was delivered to a data centre designated by the contracting authority, located in Sofia, in 23 Blvd. Gen. Skobelev" (evidence no. 6, page 14).
It further indicates that, under Action 3: Deployment and Action: 5 Guarantee Maintenance, the deployment of the delivered equipment and the guaranteed maintenance, including all foreseen sub-activities, were successfully completed as follows: *"Completed installation, configuration and adjustment of the equipment supplied and acceptance of the results of the implementation of the activities falling within the scope of Action 3: 'Deployment'* […]".

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 278 Upgraded Monitorstat system

Related Measure: C10.I10 Monitorstat system

Qualitative Indicator: Upgrade of system and adoption of methodology

Time: Q4 2025

1. Context:

The objective of this investment is to structure the information concerning the strategic planning processes of the central government. The investment consists in the upgrade of the Monitorstat system.

Milestone 278 requires that the Monitorstat system shall be upgraded into a tool where strategic documents can be uploaded and their progress monitored and a methodology on strategic documents shall be adopted.

Milestone 278 is the only milestone of this investment.

2. Evidence provided:

	Name of the evidence. For legal acts please provide the full legal reference and date of entry into force	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled.
2	Acceptance Protocol No Ko-888 of 25 November 2024 (“hereinafter Protocol No Ko-888”)	Acceptance Protocol No Ko-888 signed by the contracting authority (National Statistical Institute) and the contactor. It certifies that stage I of the upgrade of the Monitorstat was completed in accordance with the signed contract. It also certifies that the upgraded system was accepted by the contracting authority without remarks.
3	Final Acceptance Protocol No Ko-781 of 21 October 2025 (“hereinafter Protocol No Ko-781”)	Acceptance Protocol No Ko-781 signed by the contracting authority (National Statistical Institute) and the contactor. It certifies that the final stage of the upgrade of the Monitorstat was completed in accordance with the signed contract. It also certifies that the upgraded system was accepted by the contracting authority without remarks.
4	Signed contract RD – 08 71 of 27 October 2023	The contract was signed between the contracting authority (National Statistical

		Institute) and the contractor for the upgrade of the Monitorstat system. The contract is available at: https://app.eop.bg/today/284763
5	Summary report prepared by an attorney on the implementation of milestone 278	The National Statistical Institute (as the contracting authority) signed a contract with attorney Mitkov with a reference RD – 09 – 44 of 3 December 2025. The subject of the contract is the preparation of a summary financial and technical report on the implementation of the investment. The summary report concerning verification of compliance of the project with the requirements of the milestoneincludes as annexes a financial report, technical report, minutes of meetings with the National Statistical Institute and the contractor. The summary report concludes that the project was implemented in full compliance with the requirements under the National Recovery and Resilience Plan.
6	Council of Ministers decision No.681 of 6 October 2025 (hereinafter "Decision No.681")	Decision No.681 concerning the approval of the Methodology for Strategic Planning (hereinafter "Methodology"), included as an Annex to the decision.
7	Council of Ministers decision No.867 of 12 December 2025 (hereinafter "Decision No.867")	Decision No.867 concerning the approval of conditions, procedures and deadlines for publishing in the Monitorstat information system. The Annex to the decision specifies the key indicators by policy area for the purposes of strategic planning and publication in the Monitorstat system.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

- **The Monitorstat system shall be upgraded into a tool where strategic documents can be uploaded and their progress monitored**

Acceptance Protocol No Ko-888 (evidence No. 2) and Final Acceptance Protocol No Ko-781 (evidence No. 3) demonstrate that the works related to the upgrade of the Monitorstat system were completed and accepted by the contracting authority in accordance the signed contract. The Bulgarian authorities also submitted an independent report (evidence no. 4), following an external review of the implementation of the project. The report confirms that the upgraded Monitorstat system is a tool that allows for strategic documents to be uploaded and their progress monitored.

Moreover, the Commission services conducted an on-the-spot check on 7 April 2026 to verify that the functionalities of the Monitorstat system allow for strategic documents to be uploaded and their progress monitored. This check was completed successfully, confirming that registered users from

the public administration can upload strategic documents in a standardised format and the progress of the implementation of strategic documents can be monitored.

- **A methodology on strategic documents shall be adopted**

With Decision No.681 of 6 October 2025 (hereinafter "Decision No.681", evidence No. 6, point 2), the Council of Ministers approved the Methodology establishing a unified framework for the development, monitoring, reporting, control and evaluation of national strategic documents. It also establishes the structure, content and processes for the preparation of strategic documents (section 4 of the Methodology).
According to Decision No.681 (evidence No. 6, point 2), the Methodology applies to the development, reporting, monitoring of implementation and evaluation of the national strategic planning documents defined in the Methodology as "national strategic documents", which specifically include: (i) the National Development Strategy of the Republic of Bulgaria – National Development Programme Bulgaria 2030, (ii) national strategies, (iii) action plans, (iv) national programmes, (v) strategic planning documents expressly referenced in acts of the European Union or international treaties.

Decision No.681 (evidence No. 6, point 3) also includes a list of documents which are considered as "non-strategic documents" and to which the Methodology does not apply, including: (i) documents related to budgetary planning and forecasting, (ii) documents governing procedures, models and mechanisms of interaction between public authorities, (iii) documents setting out the terms and conditions for the provision of funding from public resources, (iv) documents setting out public policy objectives as well as measures for their implementation for part of the territory of the country.

Decision No.681 (evidence, No. 6, point 2) stipulates that the Methodology applies as of 1 January 2026 and that information on strategic documents shall be published in the Monitorstat system (evidence No. 5, point 5) under conditions defined by the Council of Ministers at the proposal of the Director of the National Statistical Institute.

With Decision No. 867 of 12 December 2025 (hereinafter "Decision No. 867", evidence No. 7), the Council of Ministers approves the conditions, procedures and deadlines for publishing information in the Monitorstat information system, as proposed by the Director of the National Statistical Institute (in accordance with Decision No.681, point 5). It ensures standardised publication of all strategic documents in a single system, structured by policy area and indicators with baseline and target values. The Annex to the Decision approves the key indicators by policy area for the purposes of strategic planning and publication in Monitorstat.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 285 People trained to ensure their capacity to implement the RRP

Related Measure: C10.I11 Information and administrative environment for the recovery and resilience plan

Qualitative Indicator: Trainings organised

Time: Q4 2025

1. Context:

The objective of this investment is to increase the administrative capacity for the delivery of projects in the context of performance-based funding, with a focus on the recovery and resilience plan of Bulgaria.

The investment consists in upgrades to the Unified Management Information System, trainings on public procurement, and video guides.

Milestone 285 is the seventh and last milestone of the investment, and it follows the completion of milestone 279 related to the provision of the repository system for the implementation of the RRP, target 280 related to updating video guides to cover in full all business processes of the RRP information system, milestone 281 related to entry into force of the act setting up the Management and Control System, milestone 282 related to approval of workload analysis of the National Fund Directorate and amendments to the structural regulations for the Audit Agency and implementation of recommendations, target 283 related to trainings on procurement, and milestone 284 related to updates of video guides.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the consecutive elements) was satisfactorily fulfilled.
2	Annex 1 Participation lists	For each training a list of participants in trainings organised by the National Fund Directorate, with the handwritten signatures by the participants in the trainings.
3	Annex 2 Registration lists	For each training a registration list for online participation.
4.	Annex 4 Reports on activities related to the delivered trainings	A list of reports on the activities contracted for the 11 trainings signed by the contractor and the National Fund Directorate in the period between January 2024 and December 2025.
5.	Power point presentations	For each training, power point presentations,

	from trainings organised between January 2024 and December 2025.	which demonstrate the content of the training on activities under the RRF.

3. Analysis:

Trainings organised on the activities under the RRF.

According to the reports on activities related to the delivery of the trainings (evidence no. 4) signed by the National Fund Directorate between January 2024 and December 2025, 11 trainings were organised by the National Fund Directorate on the activities under the RRF, as follows:

- "Dedicated training for final recipients under the RRP" organised on 30 January 2024 (evidence no. 5).
- "Specialised training with horizontal RRP structures" organised on 5-6 March 2024.
- "Dedicated training for final recipients under the RRP" organised on 9 April 2024.
- "Specific training for final recipients under the RRP" organised on 18 April 2024.
- "Dedicated training for final recipients under the RRP" organised on 13 June 204.
- "Dedicated training for final recipients under the RRP" organised on 20 June 2024.
- "Dedicated training for final recipients under the RRP" organised on 9 May 2025.
- "Specialised training with horizontal RRP structures" organised on 16-17 July 2025
- "Dedicated training for final recipients under the RRP" organised on 28 October 2025.
- "Protection of EU's financial interests" organised on 17-18 November 2025.
- "Dedicated training for RRP Control Plan (CP) and Supplier Management Review (SMR)" organised on 9 December 2025.

Furthermore, the authorities also provided for each of the 11 trainings a participation list (evidence no. 2) with the handwritten signatures by the participants in the trainings, demonstrating that the trainings were organised and have taken place.

For each of the trainings, the authorities provided power-point presentations (evidence no.5), which together with the reports on activities related to the delivery of the trainings (evidence no. 4) show that the subject of the trainings concerned activities under the RRF, covering the following topics:

- Plan revisions under Art. 21 of the RRF Regulation,
- Payment assessments and preparation of cover notes,
- Sound financial management and public procurement,
- Monitoring and reporting: protection of the EU's financial interest,
- Management and control system of the RRP,
- Implementation of the RRP: path to 2026,
- Preparation of financial closure of investments,
- Budget procedure and good practices in planning funds for investments,
- Rules and deadlines for submitting forecasts,
- Accounting reporting for the final recipient: requirements for documentation and analytical reporting.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Target: 304 Territorial structures of the Social Assistance Agency renovated

Related Measure: C11.I4 Renovation of the Social Assistance Agency

Quantitative Indicator: Number

Baseline: 0

Target: 419

Time: Q4 2025

1. Context:

The objective of this investment is to renovate the Social Assistance Agency territorial structures, including providing accessibility for persons with disabilities. The measure consists of renovation works and delivery of equipment.

Target 304 requires that renovation works of 91 Social Assistance Agency territorial structures shall be carried out, air conditioning appliances in 181 Social Assistance Agency territorial structures shall be delivered, and stair-climbing devices in 147 Social Assistance Agency territorial structures shall be delivered.

Target 304 is the second and last target of the investment, and it follows the completion of milestone 303, related to the signature of contracts for the activities required under target 304.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	The summary document duly justifying how the target (including its constitutive elements) is satisfactorily fulfilled
2	Table with 252 Social Assistance Agency territorial structures and information on the type of activities carried out or delivered in each	A list of 252 Social Assistance Agency territorial structures which have experienced under the investment one or more of the following interventions: air-conditioning systems delivered, stair-climbing devices delivered, or renovation works carried out
3	67 sampled acceptance protocols	Signed acceptance protocols verifying one or more of the following: renovation works carried out, delivery of air-conditioning appliances or delivery of stair-climbing devices in relation to Social Assistance Agency territorial structures

4	66 sampled contracts	Signed contracts for renovation works, delivery of air-conditioning appliances or delivery of stair-climbing devices

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the target.

Renovation works of 91 Social Assistance Agency territorial structures shall be carried out.
Air conditioning appliances in 181 Social Assistance Agency territorial structures shall be delivered.
Stair-climbing devices in 147 Social Assistance Agency territorial structures shall be delivered.

Bulgaria submitted a list of 252 Social Assistance Agency (hereinafter referred to as "SAS") territorial structures (evidence no. 2). These locations have undergone one or more of the following interventions: renovation works have been carried out, delivery of air-conditioning appliances, or delivery of stair-climbing devices. According to this list, renovation works have been carried out in 91 SAS territorial structures, air conditioning appliances have been delivered in 181 SAS territorial structures, and stair-climbing devices have been delivered in 147 SAS territorial structures. This amounts to a total of 419 interventions performed at SAS territorial structures, which is equal to the goal of the target under assessment.

Following the selection of a random sample of 60 units, Bulgaria submitted copies of 67 acceptance protocols (evidence no. 3) and 66 contracts (evidence no. 4). This represented 21 renovation works interventions, 41 deliveries of air conditioning appliances and 27 deliveries of stair climbing devices, covering 60 SAS territorial structures. Each acceptance protocol covered either the completion of renovation works, the delivery of air conditioning appliances or the delivery of stair climbing devices. Each acceptance protocol was signed by a representative of a SAS territorial structure, as one party, and a service provider, as the other party. Each acceptance protocol and each contract were dated in the RRF eligibility timeframe, i.e. after 1 February 2020. The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 332 Signature of contract(s) for construction and/or renovation works and for supply of medical equipment

Related Measure: C12.I2 Centres for interventional diagnosis and endovascular treatment of cerebrovascular diseases

Qualitative Indicator: Signed contract(s)

1. Context:

The objective of the investment is to increase the access of care provided for cerebrovascular diseases. The measure consists in construction works and supply of equipment for specialised centres in hospitals.

Milestone 332 concerns the signature of contract(s) for the construction and/or renovation and the supply of medical equipment for medical centres for interventional diagnosis and treatment of cerebrovascular diseases categorised as group 2 in the Concept for the Development of Centres for Interventional Diagnostics and Endovascular Treatment of Cerebrovascular Diseases.

Milestone 332 is the first step of the implementation of the investment. It will be followed by target 333, related to the completion of construction and/or renovation works and the supply of equipment.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled.
2	Contract No RD-11-22 of 23 January 2026	Signed contract with the Ministry of Healthcare for the construction and installation works for UMHAL "Dr. Georgi Stranski" EAD, Pleven (in accordance with Article 1 laying down the scope of the contract).
3	Contract No RD-11-23 of 23 January 2026	Signed contract with the Ministry of Healthcare for the construction and installation works for the University Hospital "St. Ivan Rilski" EAD, Sofia (in accordance with Article 1 laying down the scope of the contract).
4	Contract No RD-11-375 of 27 August 2025	Signed contract with the Ministry of Healthcare for the construction and installation works for the University Hospital "St. Marina" EAD, Varna (in accordance with Article 1 laying down the

		scope of the contract).
5	Contract No RD-11-387 of 9 September 2025	Signed contract with the Ministry of Healthcare for the construction and installation works for University Hospital "St. George" EAD, Plovdiv (in accordance with Article 1 laying down the scope of the contract).
6	Contract No RD-11-491 of 30 October 2025	Signed contract with the Ministry of Healthcare for the construction and installation works for St. Anna University Hospital AD, Sofia (in accordance with Article 1 laying down the scope of the contract).
7	Contract No RD-11-559 of 12 December 2025	Signed contract with the Ministry of Healthcare for the construction and installation works for USMBAL Pirogov EAD, Sofia (in accordance with Article 1 laying down the scope of the contract).
8	Contract RD-11-62 of 12 March 2025	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment - Training simulator for interventional endovascular procedures in the field of angiography - 5 units (in accordance with Article 1 laying down the scope of the contract).
9	Contract RD-11-267 of 11 July 2025	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment - 1.5 Tesla magnetic resonance imaging for the needs of training centers – 4 units (in accordance with Article 1 laying down the scope of the contract).
10	Contract RD-11-182 of 8 May 2025	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment - Multi-detector computed tomography scanner – 6 units (in accordance with Article 1 laying down the scope of the contract).
11	Contract RD-11-446 of 11 December 2024	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment -Biplane angiography system for performing neuro-radiological endovascular procedures – 5 units, Perfusors – 130 units; Infusion pumps/infusomats – 90 units (in accordance with Article 1 laying down the scope of the contract).
12	Contract RD-11-481 of 19 December 2024	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and

		specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment -Biplane angiography system for performing neuro-radiological endovascular procedures – Intensive care beds – 66 units (in accordance with Article 1 laying down the scope of the contract).
13	Contract RD-11-183 of 8 May 2025	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment -Biplane angiography system for performing neuro-radiological endovascular procedures – Anesthesia machines – 28 units (in accordance with Article 1 laying down the scope of the contract).
14	Contract RD-11-61 of 12 March 2025	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment -Biplane angiography system for performing neuro-radiological endovascular procedures - Patient monitors with central monitoring station (nurses' station) – 70 units (in accordance with Article 1 laying down the scope of the contract).
15	Contract RD-11-453 of 14 December 2024	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment -Biplane angiography system for performing neuro-radiological endovascular procedures - EEG machine – 5 units (in accordance with Article 1 laying down the scope of the contract).
16	Contract RD-11-482 of 20 December 2024	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment - Mobile X-ray – 5 units (in accordance with Article 1 laying down the scope of the contract).
17	Contract RD-11-467 of 18 December 2024	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment - Echocardiograph – 6 units (in accordance with Article 1 laying down the scope of the contract).
18	Contract RD-11-451 of 16 December 2024	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and

		specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment - Invasive and non-invasive respirators – 43 units (in accordance with Article 1 laying down the scope of the contract).
19	Contract RD-11-452 of 16 December 2024	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment - Defibrillators – 13 units (in accordance with Article 1 laying down the scope of the contract).
20	Contract RD-11-495 of 4 November 2025	Signed contract with the Ministry of Healthcare for medical devices, medical equipment, and specialized diagnostic software for the creation of centers for interventional diagnostics and endovascular treatment - Specialized diagnostic software – 6 units (in accordance with Article 1 laying down the scope of the contract).
21	Updated concept for the Development of Centres for Interventional Diagnostics and Endovascular Treatment of Cerebrovascular Diseases of 4 June 2025 (hereinafter referred to as "the Concept")	The Concept is based on a report of the Deputy Minister of Healthcare and is signed by the Minister of Healthcare on 4 June 2025. It provides the final set of criteria and lists of hospitals included in groups 1 and 2 of stroke centres. Group 1 includes 17 centres and group 2 includes 6 centres. The Concept was preceded by two previous versions and amends them: (i) Protocol-Decision No 67 of 14 November 2023 from the management meeting of the Ministry of Healthcare approving the report of the working group set up to develop the concept for stroke centres and (ii) Protocol-Decision No 73 of 12 December 2023 from the management meeting of the Ministry of Healthcare approving the report of the working group which modifies the criteria for selection and the number of stroke centres in group 1 and group 2.
22	Distribution list of medical equipment (hereinafter "Distribution list")	The Distribution list forms part of the public procurement documents and is available here: https://app.eop.bg/today/408369. It provides an overview of how the procured equipment is planned to be distributed across the hospitals in group 2.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Signature of contract(s) for construction and/or renovation works and for the supply of medical equipment

The contract(s) shall cover the construction and/or renovation and the supply of medical equipment [...]

The signed contracts provided by the Bulgarian authorities cover construction and installation works (evidence no. 2-7) and the supply of medical equipment (evidence no. 8-20).

In particular, six contracts were signed with the Ministry of Healthcare for construction works, including installation works of medical equipment (evidence no. 2-7). Article 1 of each of the signed contracts defines its scope and specifies the hospitals in which the works shall take place. The six hospitals are UMHAL "Dr. Georgi Stranski" EAD, Pleven, University Hospital "St. Ivan Rilski" EAD, Sofia, University Hospital "St. Marina" EAD, Varna, University Hospital "St. George" EAD, Plovdiv, St. Anna University Hospital AD, Sofia, USMBAL Pirogov EAD, Sofia.

The Bulgarian authorities also demonstrated that 12 contracts were signed for the supply of medical equipment, specified in Article 1 of each of the signed contracts (evidence no. 8-20). As of this, there are sufficient contracts to cover for the follow up target 333 in terms of supply of equipment covering six Group 2 centres.

[...] for medical centres for interventional diagnosis and treatment of cerebrovascular diseases categorised as group 2 in the Concept for the Development of Centres for Interventional Diagnostics and Endovascular Treatment of Cerebrovascular Diseases. Furthermore, in line with the description of the measure, **the measure consists in construction works and supply of equipment for specialised centres in hospitals.**

The Bulgarian authorities demonstrated that the construction works and the supply of medical equipment shall take place in six medical centres for interventional diagnosis and treatment of cerebrovascular diseases (hereinafter referred to as “stroke centres”).

The six stroke centres are categorised as group 2 in the Concept for the Development of Centres for Interventional Diagnostics and Endovascular Treatment of Cerebrovascular Diseases are created (hereinafter referred to as “the Concept”). The Concept was developed and amended by the Ministry of Healthcare with its final version adopted on 4 June 2025 (evidence no. 21).

In accordance with the Concept, group 2 are centres for endovascular treatment to be set up in hospitals which comply with specific criteria and which are listed in the Concept (evidence no. 21, p. 4). These hospitals are: UMHAL "Dr. Georgi Stranski" EAD, Pleven, University Hospital "St. Ivan Rilski" EAD, Sofia, University Hospital "St. Marina" EAD, Varna, University Hospital "St. George" EAD, Plovdiv, St. Anna University Hospital AD, Sofia, USMBAL Pirogov EAD, Sofia. These hospitals correspond to the hospitals that are listed in the contracts for construction works (evidence no. 2-7) and the contracts for the supply of medical equipment (evidence no. 8-20).

In particular, the precise allocation of the medical equipment between the six stroke centres listed in the Concept is set out in the Distribution list which forms part of the public procurement documents

(evidence no. 22) and is included in each of the signed contracts for the supply of equipment as Annex 4 (evidence no. 8-20).

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 343 Signature of contract(s) for the construction and/or renovation works for outpatient units or mobile ambulatory containers as well as the supply of equipment

Related Measure: C12.I7 Development of outpatient care

Qualitative Indicator: Signed contract(s)

1. Context:

The objective of this investment is to foster preventive and outpatient care in remote areas. The measure consists in building or renovating outpatient medical units or ambulatory containers

Milestone 343 concerns the signature of contract(s) for the construction and/or renovation works for 100 outpatient care units or mobile ambulatory containers as well as the supply of equipment. The milestone also covers contract(s) shall cover the supply of a digital platform.

Milestone 343 is the first step of the implementation of the investment. It will be followed by target 345, related to the completion of construction and/or renovation works, the supply of equipment and the access to a digital platform.

2. Evidence provided:

	Name of the evidence	Short description
1	Summary document	Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled.
2	Contract No. RD-11-563 of 16 December 2025	Signed contract for the development of a digital platform to support the diagnosis and treatment of socio-significant diseases and the introduction of remote medical advice services, in implementation of investment C12.I7: 'Development of outpatient care' (in accordance with Article 1 laying down the scope of the contract).
3	Contract No. RD-11-67 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Patient chair/manipulation chair/couch - 200 pieces (in accordance with Article 1 laying down the scope of the contract).
4	Contract No. RD-11-67 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Patient chair/manipulation chair/couch - 200 pieces (in accordance with Article 1 laying down the scope of the contract).
5	Contract No. RD-11-82 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Additional light

		source for easier viewing with directional "snowflake" type lighting - 100 pieces (in accordance with Article 1 laying down the scope of the contract).
6	Contract No. RD-11-81 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Dressing, procedural or instrument trolley/table - 200 pieces (in accordance with Article 1 laying down the scope of the contract).
7	Contract No. RD-11-74 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Infusion therapy stands – 200 pieces (in accordance with Article 1 laying down the scope of the contract).
8	Contract No. RD-11-71 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Scale with height gauge - 100 pieces (in accordance with Article 1 laying down the scope of the contract).
9	Contract No. RD-11-72 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Stretcher - 100 pieces (in accordance with Article 1 laying down the scope of the contract).
10	Contract No. RD-11-69 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Bag with emergency kit (airway management) - laryngoscope, self-inflating balloon with three sizes of masks, mouthpiece, Gödel airways - 100 pieces (in accordance with Article 1 laying down the scope of the contract).
11	Contract No. RD-11-70 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Mobile aspiration device - 100 pieces (in accordance with Article 1 laying down the scope of the contract).
12	Contract No. RD-11-66 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Sterilizer -100 pieces (in accordance with Article 1 laying down the scope of the contract).
13	Contract No. RD-11-60 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Ear disease diagnostic device - 100 pieces (in accordance with Article 1 laying down the scope of the contract).
14	Contract No. RD-11-62 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Automatic defibrillator - 200 pieces (in accordance with Article 1 laying down the scope of the contract).
15	Contract No. RD-11-61 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Modular wireless diagnostic system - 100 pieces (in accordance with Article 1 laying down the scope of the contract).
16	Contract No. RD-11-63 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Multifunctional telemedicine case for mobile diagnostics - 100

		pieces (in accordance with Article 1 laying down the scope of the contract).
17	Contract No. RD-11-59 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Multisensor telemedicine device to support diagnostics in mobile medical stations - 100 pieces (in accordance with Article 1 laying down the scope of the contract).
18	Contract No. RD-11-58 of 16 February 2026	Signed contract for the supply of medical equipment for outpatient clinics: Devices for remote services - 700 pieces (in accordance with Article 1 laying down the scope of the contract).
19	Contract No. 012 of 8 April 2026	Signed contract for the renovation of one outpatient care unit and sanitary facilities in Dolno Botevo village, municipality of Stambolovo (in accordance with Article 1 laying down the scope of the contract).
20	Contract No. 011 of 8 April 2026	Signed contract for the renovation of one outpatient care unit and sanitary facilities in Pchelari village, municipality of Stambolovo (in accordance with Article 1 laying down the scope of the contract).
21	Contract of 24 April 2026	Signed contract for renovation works of one outpatient unit in the village of Asparuhovo, in the municipality of Levski (in accordance with Article 1 laying down the scope of the contract). Signed contracts are valid and legally binding also without being assigned a contract number, in accordance with the Ordinance on the Exchange of Documents within the Administration of the Republic of Bulgaria (adopted by the Council of Ministers Decree No. 101 of 17 May 2008).
22	Contract No. 63 of 7 April 2026	Signed contract for the construction and installation works of one outpatient care unit in the village of Pomoshtnik in the municipality of Galabovo (in accordance with Article 1 laying down the scope of the contract).
23	Contract No. D-00-345 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in the village of Shishkovtsi, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
24	Contract No. D-00-346 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in the village of Razhdavitsa, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
25	Contract No. D-00-347 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in

		the village of Tavalichevo, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
26	Contract No. D-00-349 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in the village of Piperkov chiflik, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
27	Contract No. D-00-350 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in the village of Nikolichevtsi, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
28	Contract No. D-00-351 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in the village of Kopilovtsi, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
29	Contract No. D-00-352 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in the village of Saborit, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
30	Contract No. D-00-353 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in the village of Gyueshevo, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
31	Contract No. D-00-354 of 18 March 2026	Signed contract for engineering, design, construction works in one outpatient care unit in the village of Granitsa, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
32	Contract No. D-00-355 of 18 March 2026	Signed contract for engineering, design, construction works of one outpatient care unit in the village of Vratsa, Kyustendil Municipality (in accordance with Article 1 laying down the scope of the contract).
33	Contract No. 174 of 20 March 2026	Signed contract for renovation works of one outpatient care unit in the village of Cherkovitsa, Municipality of Nikopol (in accordance with Article 1 laying down the scope of the contract).
34	Contract No. 04362 of 05 May 2026	Signed contract for the construction works of one outpatient care unit in the village of Leskovets, municipality of Oryahovo (in accordance with Article 1 laying down the scope of the contract).
35	Contract No. Dog-116 of 20 March 2026	Signed contract for carrying out construction works in one outpatient care unit in Asparuhovo, Dalgopol Municipality, (in accordance with Article 1 laying down the scope of the contract).

36	Contract No. D-329 of 14 May 2026	Signed contract for construction works for one outpatient care unit in s. Kamenets, Straldzha Municipality (in accordance with Article 1 laying down the scope of the contract).
37	Contract No. 212 of 08 May 2026	Signed contract for renovation works for one outpatient care unit in s. Kozlets, Haskovo Municipality (in accordance with Article 1 laying down the scope of the contract).
38	Contract No. 213 of 08 May 2026	Signed contract for renovation works for one outpatient care unit in s. Mandra, Haskovo Municipality (in accordance with Article 1 laying down the scope of the contract).
39	Contract No. 38 of 27 February 2026	Signed contract for renovation works of one outpatient care unit, in the town hall building of the village of Banichan, municipality. Gotse Delchev, Blagoevgrad (in accordance with Article 1 laying down the scope of the contract).
40	Contract No. 61 of 17 April 2026	Signed contract for the supply and installation of one mobile ambulatory container in Stankova machala, Dolen Village, Zlatograd Municipality', (in accordance with Article 1 laying down the scope of the contract).
41	Contract of 24 April 2026	Signed contract for renovation works for six outpatient care units from settlements in the municipality of Levski as follows: 1. Gradishte; 2. Kozar Belene; 3. Izgrev; 4. Malchika. 5. Obnova. 6. Tranchovitsa. Signed contracts are valid and legally binding also without being assigned a contract number, in accordance with the Ordinance on the Exchange of Documents within the Administration of the Republic of Bulgaria (adopted by the Council of Ministers Decree No. 101 of 17 May 2008).
42	Contract No. 26-SV-005 from 30 March 2026	Signed contract for renovation works of one outpatient care unit in the town hall building in Borovina, municipality of Madan (in accordance with Article 1 laying down the scope of the contract).
43	Contract No. 26-SV-007 from 30 March 2026	Signed contract for renovation works of one outpatient care unit in the town hall building in

		Galishte, municipality of Madan (in accordance with Article 1 laying down the scope of the contract).
44	Contract No. 05 of 15 May 2026	Signed contract for the construction of modern facilities for the provision of medical equipment and furnishings for one outpatient care unit in the village of Podgore, Makresh Municipality, (in accordance with Article 1 laying down the scope of the contract).
45	Contract No. 31 of 15 May 2026	Signed contract for the construction works for one outpatient care unit in s. Yagodina, Borino Municipality, (in accordance with Article 1 laying down the scope of the contract).
46	Contract No. 155 of 02 April 2026	Signed contract for renovation works for one outpatient care unit in premises in the town hall building in the village of Osenovlag, municipality of Svoge (in accordance with Article 1 laying down the scope of the contract).
47	Contract No. 156 of 02 April 2026	Signed contract for renovation of one outpatient care unit in the building of the community centre in Gabrovnitsa, municipality of Svoge (in accordance with Article 1 laying down the scope of the contract).
48	Contract No. 191 of 08 April 2026	Signed contract for the construction, supply and installation of one finished mobile ambulatory container in s. Asenovo, the municipality of Nikopol (in accordance with Article 1 laying down the scope of the contract).
49	Contract No. 41 of 15 May 2026	Signed contract for the construction, supply and installation of one finished mobile ambulatory container in s. Yantra, the municipality of Gorna Oryahovitsa (in accordance with Article 1 laying down the scope of the contract).
50	Contract No. 42 of 15 May 2026	Signed contract for the construction, supply and installation of one finished mobile ambulatory container in s. Pisarevo, the municipality of Gorna Oryahovitsa (in accordance with Article 1 laying down the scope of the contract).
51	Contract No. 20.3.2-15 of 18 May 2026	Signed contract for the supply and installation of one mobile ambulatory container in Valchedrum (in accordance with Article 1 laying down the scope of the contract).
52	Contract No. 20-75 of 28 April 2026	Signed contract for renovation works for one outpatient care unit in Byala (in accordance with Article 1 laying down the scope of the contract).
53	Contract No. 20-83 of 18 May 2026	Signed contract for the supply and installation of one mobile ambulatory container in the village of Gospodinovo, Byala Municipality (in accordance with Article 1 laying down the scope of the contract).

54	Contract No. 20-84 of 18 May 2026	Signed contract for the supply and installation of one mobile ambulatory container in the village of Dyulino, Byala Municipality (in accordance with Article 1 laying down the scope of the contract).
55	Contract No. 359 of 31 March 2026	Signed contract for the construction, supply and installation of one finished mobile ambulatory container in the village of Drugan, municipality of Radomir (in accordance with Article 1 laying down the scope of the contract).
56	Contract No. 26 of 31 March 2026	Signed contract for the supply and installation of one mobile ambulatory container in the village of Markovo, municipality of Kaspichan, (in accordance with Article 1 laying down the scope of the contract).
57	Contract No. 27 of 31 March 2026	Signed contract for the supply and installation of one mobile ambulatory container in the village of Kosovo, municipality of Kaspichan, (in accordance with Article 1 laying down the scope of the contract).
58	Contract No. 43 of 20 May 2026	Signed contract for the purchase, transport and installation of one finished mobile ambulatory container in the village of Plovdivtsi, municipality of Rudozem (in accordance with Article 1 laying down the scope of the contract).
59	Contract No. 44 of 20 May 2026	Signed contract for the purchase, transport, installation of one finished mobile ambulatory container in the village of Ravninata, municipality of Rudozem (in accordance with Article 1 laying down the scope of the contract).
60	Contract No. 45 of 20 May 2026	Signed contract for the purchase, transport, installation of one finished mobile ambulatory container in the village of Vitina, municipality of Rudozem (in accordance with Article 1 laying down the scope of the contract).
61	Contract No. 62 of 04 May 2026	Signed contract for the supply and installation of one mobile ambulatory container in s. Draganica, municipality of Varshets (in accordance with Article 1 laying down the scope of the contract).
62	Contract No. 63 of 04 May 2026	Signed contract for the supply and installation of one mobile ambulatory container in s. Spanchevtsi, municipality of Varshets (in accordance with Article 1 laying down the scope of the contract).
63	Contract No. 65 of 04 April 2026	Signed contract for the supply and installation of one finished mobile ambulatory container in Mogila village, Tundzha Municipality (in accordance with Article 1 laying down the scope of the

		contract).
64	Contract No. D-RD 36-66 of 30 April 2026	Signed contract for the supply and installation of one finished mobile ambulatory container in s. Ptichar, Momchilgrad Municipality (in accordance with Article 1 laying down the scope of the contract).
65	Contract No. D-RD 36-65 of 30 April 2026	Signed contract for the supply and installation of one finished mobile ambulatory container in s. Karamfil, Momchilgrad Municipality (in accordance with Article 1 laying down the scope of the contract).
66	Contract No. PO-07-363 of 24 April 2026	Signed contract for renovation works of oneoutpatient care unit in a building in s. Belitsa, Municipality of Tutrakan (in accordance with Article 1 laying down the scope of the contract).
67	Contract No. PO-07-364 of 24 April 2026	Signed contract for renovation works of one outpatient care unit in a building in s. Nova Cherna, Municipality of Tutrakan (in accordance with Article 1 laying down the scope of the contract).
68	Contract No. 26-101 of 29 April 2026	Signed contract for construction works of one outpatient care unit in Kostandovo, municipality of Rakitovo (in accordance with Article 1 laying down the scope of the contract).
69	Contract No. OP 63 of 15 May 2026	Signed contract for renovation works in one outpatient care unit in s. Chernook (in accordance with Article 1 laying down the scope of the contract).
70	Contract No. OP 64 of 15 May 2026	Signed contract for renovation works in one outpatient care unit in s. Venchan (in accordance with Article 1 laying down the scope of the contract).
71	Contract No. OP 65 of 15 May 2026	Signed contract for renovation works in one outpatient care unit in s. Gradinarovo (in accordance with Article 1 laying down the scope of the contract).
72	Contract No. OP 66 of 15 May 2026	Signed contract for renovation works in one outpatient care unit in s. Slaveykovo (in accordance with Article 1 laying down the scope of the contract).
73	Contract No. 151-04 of 08 May 2026	Signed contract for renovation works for one outpatient care unit in Melnik (in accordance with Article 1 laying down the scope of the contract).
74	Contract No. OP 73 of 27 May 2026	Signed contract for supply of one mobile ambulatory container in Ovchaga village, Provadia Municipality (in accordance with Article 1 laying down the scope of the contract).
75	Contract No. OP 71 of 27 May 2026	Signed contract for supply of one mobile ambulatory container in Zhitnitsa village, Provadia Municipality (in accordance with Article 1 laying down the scope of the contract).
76	Contract No. OP 70 of 27	Signed contract for supply of one mobile

	May 2026	ambulatory container in Dobrina village, Provadia Municipality (in accordance with Article 1 laying down the scope of the contract).
77	Contract No. OP 75 of 27 May 2026	Signed contract for supply of one mobile ambulatory container in Tutrakantsi village, Provadia Municipality (in accordance with Article 1 laying down the scope of the contract).
78	Contract No. OP 71 of 27 May 2026	Signed contract for supply of one mobile ambulatory container in Krivnya village, Provadia Municipality (in accordance with Article 1 laying down the scope of the contract).
79	Contract No. OP 74 of 27 May 2026	Signed contract for supply of one mobile ambulatory container in Petrov dol village, Provadia Municipality (in accordance with Article 1 laying down the scope of the contract).
80	Contract No. OP 69 of 27 May 2026	Signed contract for supply of one mobile ambulatory container in Barzitsa village, Provadia Municipality (in accordance with Article 1 laying down the scope of the contract).
81	Contract of 22 May 2026	Signed contract for supply of one mobile ambulatory container in the village of Kapitan Petko, municipality of Venets (in accordance with Article 1 laying down the scope of the contract). Signed contracts are valid and legally binding also without being assigned a contract number, in accordance with the Ordinance on the Exchange of Documents within the Administration of the Republic of Bulgaria (adopted by the Council of Ministers Decree No. 101 of 17 May 2008).
82	Contract of 22 May 2026	Signed contract for supply of one mobile ambulatory container in the village of Buynovitsa, municipality of Venets (in accordance with Article 1 laying down the scope of the contract). Signed contracts are valid and legally binding also without being assigned a contract number, in accordance with the Ordinance on the Exchange of Documents within the Administration of the Republic of Bulgaria (adopted by the Council of Ministers Decree No. 101 of 17 May 2008).
83	Contract No. 04426 of 05 May 2026	Signed contract for the construction of one outpatient care unit in s. Gorni Vadin, Oryahovo Municipality, (in accordance with Article 1 laying down the scope of the contract).
84	Contract No. D-00-348 of 18 March 2026	Signed contract for the construction of one outpatient care unit in s. Skrinyano, Kyustendil Municipality, (in accordance with Article 1 laying down the scope of the contract).
85	Contract No. D-156 of 29 May 2026	Signed contract for supply of one mobile ambulatory container in Iskar (in accordance with

		Article 1 laying down the scope of the contract).
86	Contract No. 446 of 28 March 2026	Signed contract for renovation works in one outpatient care unit in s. Kaloyan, Valchi dol Municipality, (in accordance with Article 1 laying down the scope of the contract).
87	Contract No. 20-92 of 01 June 2026	Signed contract for the supply of one mobile ambulatory container in s. Popovich, Byala municipality (in accordance with Article 1 laying down the scope of the contract).
88	Contract No. 171-04 of 29 May 2026	Signed contract for the supply of two mobile ambulatory container in the following villages in Sandanski municipality (in accordance with Article 1 laying down the scope of the contract): 1. Dzhigurovo 2. Levunovo
89	Contract No. 46 of 02 June 2026	Signed contract for construction and renovation works in one outpatient care unit in s. Sestrimo, Belovo Municipality, (in accordance with Article 1 laying down the scope of the contract).
90	Contract of 27 March 2026	Signed contract for construction works for one outpatient care unit in s. Chavdar (in accordance with Article 1 laying down the scope of the contract).
91	Contract No. 112 of 10 June 2026	Signed contract for renovation works of one outpatient care unit in Zaimchevo, municipality of Ruen (in accordance with Article 1 laying down the scope of the contract).
92	Contract No. 111 of 10 June 2026	Signed contract for renovation works of one outpatient care unit in Rechica, municipality of Ruen (in accordance with Article 1 laying down the scope of the contract).
93	Contract No. 110 of 10 June 2026	Signed contract for renovation works of one outpatient care unit in Listets, municipality of Ruen (in accordance with Article 1 laying down the scope of the contract).
94	Contract No. 115 of 10 June 2026	Signed contract for renovation works of one outpatient care unit in Sokolets, municipality of Ruen (in accordance with Article 1 laying down the scope of the contract).
95	Contract No. 116 of 10 June 2026	Signed contract for renovation works of one outpatient care unit in Kamenyak, municipality of Ruen (in accordance with Article 1 laying down the scope of the contract).
96	Contract No. 113 of 10 June 2026	Signed contract for renovation works of one outpatient care unit in Rozhden, municipality of Ruen (in accordance with Article 1 laying down the scope of the contract).
97	Contract No. 107 of 4 May 2026	Signed contract for renovation works of one outpatient care unit in Struya, municipality of Ruen (in accordance with Article 1 laying down the scope

		of the contract).
98	Contract No. 114 of 10 June 2026	Signed contract for renovation works of one outpatient care unit in Bilka, municipality of Ruen (in accordance with Article 1 laying down the scope of the contract).
99	Contract of 29 May 2026	Signed contract for supply of one mobile ambulatory container in s. Gabrovitsa, Belovo Municipality (in accordance with Article 1 laying down the scope of the contract). Signed contracts are valid and legally binding also without being assigned a contract number, in accordance with the Ordinance on the Exchange of Documents within the Administration of the Republic of Bulgaria (adopted by the Council of Ministers Decree No. 101 of 17 May 2008).
100	Contract No. OP 76 of 27 May 2026	Signed contract for supply of one mobile ambulatory container in Komarevo village, Provadia Municipality (in accordance with Article 1 laying down the scope of the contract).
101	Contract No. OP 3 of 05 June 2026	Signed contract for the delivery and installation of one mobile ambulatory container in Krastevich, Hisarya Municipality (in accordance with Article 1 laying down the scope of the contract).
102	Contract No. OP 4 of 05 June 2026	Signed contract for the delivery and installation of onemobile ambulatory container in Belovitsa, Hisarya Municipality (in accordance with Article 1 laying down the scope of the contract).
103	Contract of 10 June 2026	Signed contract for renovation works of one outpatient care unit in s. Stezherovo, Levski municipality (in accordance with Article 1 laying down the scope of the contract). Signed contracts are valid and legally binding also without being assigned a contract number, in accordance with the Ordinance on the Exchange of Documents within the Administration of the Republic of Bulgaria (adopted by the Council of Ministers Decree No. 101 of 17 May 2008).
104	Contract No. 26 of 11 June 2026	Signed contract for the supply and installation of one mobile ambulatory container in s. Varlino, Nedelino municipality (in accordance with Article 1 laying down the scope of the contract).
105	Contract No. 25 of 11 June 2026	Signed contract for the supply and installation of one mobile ambulatory container in s. Elenka, Nedelino municipality (in accordance with Article 1 laying down the scope of the contract).
106	Contract No. 27 of 11 June 2026	Signed contract for the supply and installation of one mobile ambulatory container in s. Garnati, Nedelino municipality (in accordance with Article 1 laying down the scope of the contract).
107	Contract No. 28 of 11 June 2026	Signed contract for the supply and installation of one mobile ambulatory container in s. Kochani,

		Nedelino municipality (in accordance with Article 1 laying down the scope of the contract).
108	Contract No. 24 of 11 June 2026	Signed contract for the supply and installation of one mobile ambulatory container in s. Izgrev, Nedelino municipality (in accordance with Article 1 laying down the scope of the contract).

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Signature of contract(s) for the construction and/or renovation works for outpatient units or mobile ambulatory containers [...]

The contract(s) shall cover construction and/or renovation works for 100 outpatient care units or mobile ambulatory containers.

The signed contracts provided by the Bulgarian authorities cover construction and/or renovation works for outpatient units or mobile ambulatory containers (evidence no. 19-108), the supply of equipment (evidence no. 3-18) and the supply of a digital platform (evidence no. 2).

The Council Implementing Decision required that the contract(s) shall cover construction and/or renovation works for 100 outpatient care units or mobile ambulatory containers. The 89 contracts submitted by Bulgaria cover construction and/or renovation works for 96 outpatient units or ambulatory containers. The Commission services verified the 89 signed contracts provided by Bulgaria and the number of outpatient care units or mobile ambulatory containers that each of them cover amounting to a total of 96 outpatient care units or mobile ambulatory containers, the nature of the works as well as their location (Article 1 of each contract, evidence no. 19-108). Whilst this constitutes a minimal numerical deviation 4% from the requirement of the Council Implementing Decision, the overall objective of this milestone is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

All contracts have been signed between 27 February 2026 and 11 June 2026.

[...] as well as the supply of equipment.

15 contracts provided by the Bulgarian authorities concern the supply of 15 lots of medical equipment for outpatient clinics as follows (evidence no. 3-18): patient chair/manipulation; chair/couch; lighting; dressing, procedural or instrument trolley/table; infusion therapy stands; scales with height gauge; stretchers; emergency kits for airway management; ear disease diagnostic devices; automatic defribillators; modular wireless diagnostic systems; multifunctional telemedicine case for mobile diagnostics; multisensor telemedicine device to support diagnostics in mobile medical stations; devices for remote (telecare) services. The Commission services verified the contracts provided by Bulgaria and that the relevant provisions in each contract includes the the type and quantity of medical equipment (evidence no. 3-18).

In addition, the contract(s) shall cover the supply of a digital platform. The platform shall:
- allow for the provision of telemedicine services;
- include modules for medical diagnostics and treatment.

The Council Implementing Decision states that "the contract(s) shall cover the supply of a digital platform" and that "the platform shall: allow for the provision of telemedicine services; and include modules for medical diagnostics and treatment". The Council Implementing Decision also states in the qualitative indicator for this milestone "signed contract(s)" and in the description of target 345 that "each outpatient care unit or mobile ambulatory container shall have access to the digital platform […]". In light of the purposive interpretation of this requirement from the Council Implementing Decision, it is interpreted that the requirement under target 343 concerns the signature of the contract(s) for the supply of a digital platform and that the respective contract(s) shall stipulate that the platform shall allow for the provision of telemedicine services and include modules for medical diagnostics and treatment. The access to the digital platform for each outpatient care unit or mobile ambulatory container will be assessed under target 345.
Bulgaria provided a contract for the development of a digital platform to support the diagnosis and treatment of socio-significant diseases and the introduction of remote medical advice services, in implementation of investment C12.I7: 'Development of outpatient care' (evidence no. 2), as stipulated in Article 1 of the contract. Article 1, defining the scope of the contract, requires the carry-out of all the activities for the development and implementation of a digital platform to support the diagnosis and treatment of major diseases and the introduction of remote medical consultation services (telemedicine).
On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

Number and name of the Milestone: 348 Preparatory measures for liberalisation of retail market

Related Measure: C13.R1 Governance framework for energy poverty and preparation of retail market liberalisation

Qualitative Indicator: Entry into force of legal act(s); adoption of a decision of the Energy and Water Regulatory Commission; approval of a communication strategy

Time: Q4 2025

1. Context:

The objective of this reform is to contribute to addressing energy poverty and protecting energy poor households and vulnerable customers, as well as to further facilitate the liberalisation of the retail market. The measure consists in legal act(s) related to energy poverty.

Milestone 348 requires that the following preparatory measures shall be taken:
1. Entry into force of legal act(s) that allow for the possibility of a targeted compensation mechanism based on the status of households as energy poor and/or as vulnerable customers.
2. Adoption of a decision of the Energy and Water Regulatory Commission (EWRC) that shall set a base value for electricity supplied to households for an annual period.

In addition, the responsible body for designing measures tackling energy poverty shall prepare a communication strategy regarding the retail electricity market liberalisation, including on measures to protect energy poor households and vulnerable customers, which shall be approved.

Milestone 348 is the second and last milestone of the reform, and it follows the completion of milestone 347, related to the adoption of legal act(s) designating and establishing responsible bodies.

2. Evidence provided:

	Name of the evidence.	Short description
1	Summary document	Summary document duly justifying how the milestone (including all its constitutive elements, as set out in the description of the milestone and of the corresponding measure in the CID Annex) was satisfactorily fulfilled.
2	"Ordinance for Amendment and Supplementation of Ordinance No. 6 of 28.03.2024 on Connection of Sites to the Electricity	Ordinance amending Ordinance No. 1 of 14.03.2017 on Regulation of Electricity Prices to insert an Art. 17a which allows for a differentiation in tariff structures of the base value of electricity to be paid by households.

	Networks", published in State Gazette No. 35 of 14 April 2026, entered into force on 14 April 2026 (Article 25)	
3	"Ordinance No. 1 of 14.03.2017 on Regulation of Electricity Prices", published in State Gazette No. 25 of 24 March 2017, amended and supplemented in State Gazette No. 35 of 14 April 2026, entered into force on 14 April 2026	Ordinance regulating electricity prices, amended by the ordinance for amendment and supplementation of Ordinance No. 6 of 28.03.2024.
4	Energy Act published in State Gazette No. 107 of 9 December 2003	Act establishing the legal framework concerning Bulgaria's energy sector.
5	Decision of the Energy and Water Regulatory Commission (EWRC) No. C-25 of 1 July 2025	Decision of the EWRC determining the base value of electricity supplied to households for the regulatory period from 1 July 2025 to 30 June 2026.
6	Council of Ministers Decision No. 766 of 7 November 2025	Decision of the Council of Ministers mandating the development and implementation of a communications strategy by the coordination mechanism.
7	Communication Strategy for retail electricity market liberalisation of January 2026	Strategy document for the communication of information and the publicity of the process of retail electricity market liberalisation.
8	Minutes of the seventh working meeting of the members of the Coordination Mechanism of 7 April 2026	Minutes from meeting confirming the approval, by the members of the coordination mechanism, of a communication strategy for supporting and informing consumers in the process of preparing the liberalisation of the retail electricity market.

3. Analysis:

The justification and substantiating evidence provided by the Bulgarian authorities cover all constitutive elements of the milestone.

Preparatory measures for liberalisation of retail market

The reform prepares the liberalisation of the retail electricity market by introducing preparatory measures to ensure that vulnerable households and energy poor customers are protected and informed during the transition. First, the entry into force of amendments to Ordinance No. 1 on

Regulation of Electricity Prices introduces the possibility of a targeted compensation mechanism based on the status of households as energy poor, as defined in the Energy Act. This allows authorities to support vulnerable households and mitigate potential negative impacts of the market liberalisation. Second, the decision of the Energy and Water Regulatory Commission (hereinafter referred to as: "the EWRC") establishes a baseline electricity price for households for a period of one year, providing a clear and stable reference for pricing during the period of transition to a liberalised market. Third, a communication strategy has been prepared to inform the public about the liberalisation process and the available protective measures. By specifically addressing households in a situation of energy poverty and setting out measures to protect them, the strategy includes targeted outreach to vulnerable groups and explains support mechanisms such as compensation, eligibility criteria, and safeguards.

The following preparatory measures shall be taken:
1. Entry into force of legal act(s) that allow for the possibility of a targeted compensation mechanism based on the status of households as energy poor and/or as vulnerable customers.

The Ordinance for Amendment and Supplementation of Ordinance No. 6 of 28.03.2024 on Connection of Sites to the Electricity Networks (hereinafter referred to as: "the ordinance amending and supplementing ordinance No. 6") (evidence no. 2) was published in State Gazette No. 35 of 14 April 2026. According to Article 25 of the ordinance amending and supplementing ordinance No. 6, it entered into force on 14 April 2026, the day of its promulgation in the State Gazette.

The ordinance amending and supplementing ordinance No. 6 provides for the possibility of a targeted compensation mechanism based on the status of households as energy poor and/or on other grounds through its Article 20 paragraph 3, which introduces Article 17a and Article 18a in Section 1 of the additional provisions of Ordinance No. 1 of 14.03.2017 on Regulation of Electricity Prices (hereinafter referred to as: "ordinance No. 1") (evidence no. 3).

Article 18a provides for the possibility of the EWRC to determine different tariff structures on the base value of electricity per 1 MWh for different consumer groups, including households identified as energy poor. Article 17a clarifies that customer groups may be defined based on whether electricity is purchased for the needs of a household in a situation of energy poverty as determined under the procedure and conditions laid down pursuant to Article 38e paragraph 2 of the Energy Act (evidence no. 4) and/or on other grounds.

The differentiated tariff mechanism introduced for specific consumer groups, including households identified as energy poor, operates through compensation provided to electricity suppliers for the reduced electricity prices applied to those groups. Under Articles 17a and 18a of ordinance No. 1, the EWRC may establish different tariff structures for distinct categories of household consumers, including energy poor households. The financial compensation for the resulting difference between the standard regulated electricity price and the reduced tariff applied to eligible consumers is administered by the Electricity System Security Fund (hereinafter referred to as: "the ESSF"), established under Article 36b of the Energy Act. In practice, final suppliers apply the differentiated tariffs to eligible households, while the ESSF reimburses those suppliers for the corresponding revenue shortfall.

As a result, these legal acts enable the possibility of introducing a targeted compensation mechanism through the final supplier of energy based on the status of households as energy poor and/or on other grounds.

2. Adoption of a decision of the Energy and Water Regulatory Commission (EWRC) that shall set a base value for electricity supplied to households for an annual period.

The Decision No. C-25 of the EWRC (evidence no. 5) adopted on 1 July 2025 determines the baseline value for electricity per MWh to be paid by the household final customer for the relevant annual regulatory period, from 1 July 2025 to 30 June 2026 (evidence no. 5, pages 54 - 55). As indicated on page 55, this baseline value is BGN 140.03 per MWh for the above regulatory period.

In addition, the responsible body for designing measures tackling energy poverty shall prepare a communication strategy regarding the retail electricity market liberalisation, including on measures to protect energy poor households and vulnerable customers, which shall be approved.

The Council of Ministers Decision No. 766 of 7 November 2025 (evidence no. 6) point 6 (b) gives the mandate for the development of the communication strategy to the responsible body for designing measures tackling energy poverty, the Coordination Mechanism for the management and alleviation of energy poverty (hereinafter referred to as: "the Coordination Mechanism") which is established by evidence 6, point I. It consists of representatives of public institutions which are outlined in point 2. of evidence no. 6, including the Ministry for Labour and Social Policy, the Ministry of Energy and the Ministry of Finance. The Coordination Mechanism has prepared the Communication Strategy for retail electricity market liberalisation of January 2026 (hereinafter referred to as: "the communication strategy") (evidence no. 7) and approved it at an internal meeting held on 7 April 2026 (evidence no. 8).

The communication strategy defines how information on the retail market liberalisation will be communicated and made public, while also setting out measures to protect energy poor households and vulnerable customers. One component of the communication strategy is the preparation of an information campaign (evidence no. 7, page 10). The communication strategy outlines the campaign's principles and objectives, the responsible institutions (evidence no. 7, pages 5 – 7), the phases of implementation (evidence no. 7, pages 17 – 19), the target groups (evidence no. 7, page 10 – 11), and the indicators for measuring performance (evidence no. 7, pages 20 – 24).

The communication strategy (evidence no. 7, page 9) also outlines communication on a package of measures to protect energy-poor households and vulnerable customers who are identified as a target group of the campaign with specific channels and outreach activities directed at them (evidence no. 7, pages 11 and 17). Measures to be communicated include clear eligibility criteria for targeted support, automated compensation and safeguard from aggressive sales practices, and continuation of established support programmes for vulnerable groups such as targeted heating allowances and compensation after the liberalisation of the retail electricity market (evidence no. 7, page 9).

4. Commission Preliminary Assessment: Satisfactorily fulfilled