

Independent Reporting Mechanism

Results Report:
Bulgaria 2022–2024

Open
Government
Partnership



Independent
Reporting
Mechanism

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Executive Summary

Despite a challenging political context, Bulgaria organized its most inclusive and thorough action plan co-creation process to date, involving civil society co-implementers in every commitment. The action plan increased pandemic-related public spending transparency and provided access to preliminary analysis of government COVID-19 expenses. Moving forward, stakeholders are encouraged to think of ways to ensure ongoing government-civil society dialogue throughout implementation, including in times of political instability.

Implementation

Bulgaria’s fourth national action plan saw three commitments achieve early results. Commitments in the fields of transparency and open data produced the strongest early results. Commitment 6 enabled the public to access some consolidated COVID-19-related public spending information, as well as a brief analysis of that spending. Six of the fourteen commitments were fully or substantially completed, which is comparable to completion levels in the second national action plan and better than completion levels in the third plan.¹ Factors supporting commitment success were the shared implementation responsibility by government and civil society for each commitment, introduced for the first time, and ongoing support and dedication by the government OGP team.

Participation and Co-Creation

Bulgaria’s participation in OGP is coordinated by the Administration of the Council of Ministers and its Administration Modernization Directorate. In the hiatus between the third and fourth national action plan, the government OGP team drafted Decree No. 132 of 2021 which established formal rules for a multi-stakeholder forum, adopted by the Council of Ministers. The government OGP team led the most inclusive and thorough action plan co-creation process yet, which combined three public consultations and a discussion phase. In addition, the criteria for including commitments in the action plan set by the government supported the creation of stronger commitments. This co-creation process was significantly more extensive,

At a Glance

LEVEL OF COMPLETION

6/14

Complete or substantially complete commitments

EARLY RESULTS

3/14

Commitments with early results

0/14

Commitments with significant results

KEY OBSERVATIONS

- The government OGP team strengthened OGP processes despite challenges posed by frequent government changes.
- Commitments that required parliamentary action to solidify open government reforms achieved fewer results than those within executive branch mandate.
- Commitments focused on providing recommendations or proposals without clear roadmaps for implementation did not produce early results.

Compliance with minimum requirements during implementation:
No

thorough, and transparent than that of the second and third action plans.² However, Bulgaria's fourth OGP action plan did not meet the minimum requirement for a space for dialogue during implementation, as government and civil society did not meet at least every six months, as per the OGP Participation and Co-Creation Standards. This could partly at least be attributed to several elections and changes in government since 2021.³

Implementation in Context

This action plan ended years of inactivity in OGP and helped revitalize the OGP process in Bulgaria. It was implemented during a time of political instability which saw four parliamentary elections and five changes of governments. This means that the OGP process was led by four different political leads from four consecutive Councils of Ministers, leading to frequent changes in the composition of the multi-stakeholder forum (MSF) and long periods where there was no political lead of the MSF.

Bulgaria's European Union integration efforts deepened during the implementation period. The country made progress towards joining the Schengen area after 12 years of negotiations, with the EU agreeing to lift air and sea border controls for Bulgaria from March 2024. Bulgaria also continued working towards eurozone membership, which was officially confirmed in June 2025.⁴ Finally, Bulgaria has started its OECD accession process.⁵

¹ "Bulgaria: 2014–2016 End-of-Term Report," Open Government Partnership, 5 June 2017, <https://www.opengovpartnership.org/documents/bulgaria-end-of-term-report-2014-2016>; "Independent Reporting Mechanism (IRM): Bulgaria End-of-Term Report 2016–2018," Open Government Partnership, 29 July 2019, <https://www.opengovpartnership.org/documents/bulgaria-end-of-term-report-2016-2018>.

² "Independent Reporting Mechanism (IRM) Progress Report 2014–2015: Bulgaria," Open Government Partnership, 8 February 2016, <https://www.opengovpartnership.org/documents/bulgaria-irm-progress-report-2014-2015>; "Independent Reporting Mechanism (IRM): Republic of Bulgaria Progress Report 2016–2017," Open Government Partnership, 30 June 2018, https://www.opengovpartnership.org/wp-content/uploads/2018/07/Bulgaria_Mid-Term_Report_2016-2018_EN.pdf.

³ "OGP Participation and Co-Creation Standards," Open Government Partnership, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>; Iren Marinova and Rickard Lindholm, "Bulgaria: Political Crisis With No End in Sight?" Wilson Center, 18 December 2024, <https://www.wilsoncenter.org/article/bulgaria-political-crisis-no-end-sight>.

⁴ Angela Barnes, Bulgaria to adopt the euro: How do countries join the Eurozone?, EuroNews, 5 June 2025, <https://www.euronews.com/business/2025/06/05/bulgaria-to-adopt-the-euro-how-do-countries-join-the-eurozone>.

⁵ C/MIN(2022)22/FINAL, Roadmap for the OECD Accession Process of Bulgaria, 10 June 2022, [https://one.oecd.org/document/C/MIN\(2022\)22/FINAL/en/pdf](https://one.oecd.org/document/C/MIN(2022)22/FINAL/en/pdf).

Section I. Key Observations

The key observations below offer reflections from Bulgaria’s fourth action plan cycle. These lessons aim to support Bulgaria’s future action plans and broader open government journey.

Observation 1: The government OGP team strengthened the OGP process despite challenges posed by frequent government changes.

While Bulgaria’s previous action plan ended in 2018, the government OGP team within the Administration of the Council of Ministers continued to champion open government, drafting a proposal for rules for the national OGP process.¹ This proposal was adopted by the government as Decree 132 in 2021, establishing a mechanism to discuss action plan implementation and facilitating institutional memory across action plans.²

Despite political instability since 2021, the OGP team organized the most inclusive and thorough action plan co-creation process to date, involving multiple public and OGP stakeholder-oriented consultations. The process included commitment filtering based on transparent criteria and co-implementation of commitments by government and civil society.³ These factors contributed to the sustainability of action plan implementation and the less frequent, but ongoing discussions on OGP.

Decree 132 states that the political lead and co-chair of the multi-stakeholder forum (MSF) must be a Deputy Prime Minister. During implementation, the country held four parliamentary elections and went through five changes of government. This meant that there were long periods where no political lead was appointed and the MSF did not meet, despite commitment to the OGP process from the OGP team and civil society. In the future, the government OGP team could consider ways to ensure that multi-stakeholder dialogue continues in times of political change, such as appointing an alternate government co-chair such as a senior civil servant, if possible, or informal stakeholder meetings. These could help ensure that the MSF meetings meet the OGP Participation & Co-Creation Standards amid political instability.

Observation 2: Commitments that required legislative approval to solidify open government reforms achieved fewer results than those within the executive branch mandate.

Commitments that sought to advance legal reforms achieved fewer results as the necessary legislation did not pass (Commitments 10, 11 and 13). Commitments 10 and 11 were successful in introducing draft laws to parliament, but none have been adopted. This can at least partially be attributed to the frequent changes in government during this period. Parliament did not participate in the design or implementation of the action plan. Looking ahead, the government OGP team could consider how to collaborate with open government champions in parliament to advance reforms.

On the other hand, commitments within the mandate of the executive branch made progress in strengthening government transparency. Commitment 6 on publishing COVID-19 public spending data and Commitment 8 on publishing information on the Open Data Portal both focused on analyzing and changing transparency and accountability practices. In particular, Commitment 6 undertook an innovative approach to establishing a COVID-19 task force for government-civil society cooperation in analyzing emergency expenditures.

Observation 3: Commitments focused on providing policy proposals without clear roadmaps for implementation did not produce early results.

Several commitments in the action plan aimed to provide recommendations or produce proposals (Commitments 3, 4 and 9). While analysis and research activities can contribute to achieving open government results, this can only be done through establishing clear steps for incorporating insights into policies or implementing recommendations, including targeting them at specific government stakeholders. For example, Commitment 3 aimed to assess internet development in Bulgaria through a multi-stakeholder approach and produced a list of general recommendations, but without targeting specific stakeholders or proposing a timeline for implementation. Moving forward, the government OGP team could consider having a clearer theory of change for commitments and incorporating milestones to operationalize insights resulting from commitment implementation into policy—potentially over multiple action plan cycles. To that end, it would be important to secure buy-in from government ministries to implement the recommendations and proposals that come from commitments so that there is sufficient follow up.

¹ Council of Ministers, “Bulgaria National Action Plan 2016–2018,” Open Government Partnership, 12 July 2016, <https://www.opengovpartnership.org/documents/bulgaria-national-action-plan-2016-2018>.

² “Постановление № 132 от 5 Април 2021 Г. За Координация На Участието На Република България В Глобалната Инициатива ‘Партньорство За Открито Управление’,” [Resolution No. 132 Of April 5, 2021 on the Coordination of the Participation of the Republic of Bulgaria in the Global Initiative “Open Government Partnership”], Ciela, 5 April 2021, <https://www.ciela.net/svobodna-zona-darjaven-vestnik/document/2137211405/issue/6390/postanovlenie-%E2%84%96-132-ot-5-april-2021-g-za-koordinatsiya-na-uchastieto-na-republika-balgarriya-v-globalnata-initsiativa->.

³ See OGP section in: “Обществено обсъждане на получените предложения за мерки за Четвъртия национален план за действие в рамките на инициативата ‘Партньорство за открито управление’,” [Public consultation on the received proposals for measures for the Fourth National Action Plan within the framework of the Open Government Partnership initiative], Bulgaria Public Consultations Portal, 1–30 September 2021, <https://www.strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&Id=6327>.

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 6: Increased COVID-19 spending transparency and initial analysis of government pandemic spending through the work of the COVID-19 task force.

Commitment 6: COVID-19 Task Force

Implementers: National Council on Anti-Corruption Policies at the Council of Ministers, Bulgarian Institute for Legal Initiatives.

Context and Objectives

This commitment aimed to establish a national COVID-19 task force to analyze, consolidate, and publish pandemic-related national data on public expenses. The commitment was proposed by the Bulgarian Institute for Legal Initiatives (BILI) and was adopted by the government as drafted. It aimed to implement transparency measures from the 2021–2027 National Strategy for Preventing and Countering Corruption.¹

A BILI report² found that COVID-19 spending raised high corruption risks and serious allegations of wrongdoing but was not followed by investigations. Another report on public procurement integrity highlighted that Bulgaria saw a considerable uptick in product purchases related to COVID-19, which in turn increased and corruption risks associated with these purchases.³ The commitment aimed to minimize these significant corruption risks and inefficiencies in the financial management of pandemic funds through transparency measures.⁴

Early Results: Moderate Results

The commitment is assessed as having moderate early results. It led to the publication of consolidated information on government spending during the COVID-19 pandemic, the first ex-post analysis of an emergency situation in Bulgaria.⁵ Publishing pandemic-related public spending could set a precedent for similar emergency spending in the future. However, the systematized data and results of COVID-19 spending were not published on the Unified Information Portal nor were the results publicized. In July 2024, the portal ceased to function. Furthermore, the planned task force was reconceived as a temporary working group, undermining the long-term sustainability of the commitment.

The commitment was substantially completed despite initial obstacles. The administration of the Council of Ministers formally established the COVID-19 task force in March 2023 by Order of the Prime Minister.⁶ While the commitment initially envisaged the task force to be a permanent multi-disciplinary team at the National Council for Anti-Corruption Policies, that was not possible due to legal obstacles, discussed below.⁷ The task force was co-chaired by BILI and government representatives including ministries, the Agency for State Financial Inspections, and the National Statistical Institute. It met twice in person and gathered COVID-19-related spending data for the period between March 2020 and March 2023 from 18 public institutions,

including all 13 ministries and key agencies such as the National Revenue Agency, the National Health Insurance Fund, and the Bulgarian Development Bank. Despite inconsistent reporting practices across institutions (only two institutions registered separate pandemic-funds-related accounting), BILI systematized this data. BILI then presented the systematized data and a summary report to the government and all members of the task force in 2023. The summary report was made available on BILI's website.⁸

The publicly available report provides an overview of total spending by policy area. BGN 9.294 billion (EUR 4.752 billion) were spent in pandemic-related expenses. BGN 3.244 billion (EUR 1.658 billion) were allocated to business support measures, BGN 1.439 billion (EUR 735 million) for household support measures and BGN 3.653 billion (EUR 1.868 billion) for activities to control the COVID-19 pandemic and its aftermath. The report also provides observations on the quality, consistency, and comparability of the data gathered across government bodies, given the lack of a uniform approach in institutional data collection.⁹ However, the systematized data on the costs of dealing with the COVID-19 pandemic, the summary report, and the results were not published on the government's official COVID-19 portal (milestone 4).¹⁰ The government's COVID-19 portal ceased to function in July 2024.

As the civil society co-implementer of the commitment, BILI noted that the commitment implementation provided more information on expenditures reporting and its quality than on detailed pandemic-related expenses. BILI's experts expressed disappointment that the government did not carry out an analysis of efficiency and effectiveness of the resources invested in relation to the results achieved, which could have led to identifying corruption risks.¹¹ According to the government, public spending for the COVID-19 pandemic is accurately reflected in the 2021 state budget.¹² BILI highlighted that the commitment's main positive aspect is the co-implementation process between government and civil society in the task force, with public bodies providing specific spending reports for analysis to a civil society organization (CSO).¹³ Traditionally, data for public spending analyses are provided only to the Bulgarian National Audit Office. Additionally, the design and implementation of the commitment was innovative, as it provided a practical example of how analysis of emergency spending can be carried out by government and civil society collaboratively, rather than focusing on reforming rules and practices through legislative or regulatory changes.¹⁴

Commitment implementation benefitted from two enabling factors. Co-implementation by government and civil society meant that when legal obstacles were encountered, the CSO pushed for an alternative route to implementation. Furthermore, the fact that the commitment focused on cooperation without formal legislative reform led to ongoing dialogue between government and civil society stakeholders.

On the other hand, commitment implementation was initially constrained by the legal form of the proposed task force, which could only be created as a temporary working group under the National Council on Anti-Corruption Policies, rather than a more stable structure within the council itself. It also hampered one of BILI's goals with this commitment, which was to revive the council.¹⁵ Another obstacle pertained to the quality of data provided by participating government bodies, which hindered the spending comparison by different criteria. Finally, BILI's experts commented that they had limited funding.¹⁶

Since the legal form of the body changed from the planned task force adjacent to a permanent council to an ad hoc working group with no mandate further than the initial gathering of data and analysis, the commitment's prospects are limited to implementation analysis and producing recommendations for spending transparency in similar emergency situations in the future.

Looking Ahead

As this commitment was related to the COVID-19 pandemic, the specific circumstances that led to its adoption no longer stand. However, emergency situations like the war in Ukraine, the refugee crisis, as well as local climate-related emergencies could lead to the allocation of emergency funds in the future.¹⁷ Therefore, implementation gaps and lessons learned from the implementation of this commitment could be useful.

Moving forward, to further commitment implementation, the Council of Ministers could:

- **Publish disaggregated COVID-19 spending data on the national open data portal**, consulting with civil society on the types of data that would be most useful to access. Data could also be presented and curated in ways that enhance their user-friendliness, such as through visualizations.
- **Consolidate lessons learned and produce recommendations for tracking spending in future emergencies.** The Council of Ministers could involve both government and civil society actors in this process and publish its findings online for interested academics, CSOs, and journalists.
- **Review the approach to financial management of public resources in emergencies.** This could be done by establishing general rules or ad hoc working groups for each emergency. Involving civil society in the review process would strengthen transparency.
- **Create a model for ongoing monitoring, control, and ex-post evaluation of emergency funding**, involving the competent institutions, such as the Ministry of Finance and the National Audit Office, at each stage. This could include standardizing the expense reporting procedure across ministries and public agencies to facilitate comparisons and transparency

¹ “Priority 1, Measure 6 on increasing transparency in the executive, and of Priority 5, Measure 7 on increasing transparency of public funds spending by medical establishments, National Strategy for Preventing and Countering Corruption (2021–2027),” Public Consultations Portal, accessed 18 April 2023, <https://strategy.bg/StrategicDocuments/View.aspx?lang=bg-BG&id=1353>.

² Bilyana Gyaurova-Wegertseder (ed.), “Прозрачност и ефективност на публичните средства за справяне с COVID-19 в България. Корупционни рискове и мерки при борбата с пандемията,” [Transparency and effectiveness of public funds for dealing with COVID-19 in Bulgaria. Corruption risks and measures in the fight against the pandemic], Bulgarian Institute for Legal Initiatives, 2021, http://www.bili-bg.org/cdir/bili-bg.org/files/2021_BILI_ANALYSIS_COVID_19_SPENDING.pdf.

³ Daniela Mineva et al., “Public procurement irregularities—hidden risks for the post-COVID economic recovery,” in: “Public Procurement Integrity in Southeast Europe,” Center for the Study of Democracy, 2022, <https://seldi.net/publications/public-procurement-integrity-in-southeast-europe-mechanisms-red-flags-and-state-owned-enterprises-in-the-energy-sector>, p. 40–41.

⁴ Gyaurova-Wegertseder (ed.), “Transparency and effectiveness of public funds for dealing with COVID-19 in Bulgaria. Corruption risks and measures in the fight against the pandemic,” Bulgarian Institute for Legal Initiatives; Mineva, et al., “Public procurement irregularities—hidden risks for the post-COVID economic recovery,” Center for the Study of Democracy.

⁵ Bilyana Gyaurova-Wegertseder (Executive Director, Bulgarian Institute for Legal Initiatives) and Teodor Slavev (Expert, Bulgarian Institute for Legal Initiatives), interview by IRM, 10 April 2025; Maria Tsankova (State Expert, Administration of the Council of Ministers) and Ralitsa Velichkova (Chief Expert, Administration of the Council of Ministers), interview by IRM, 7 March 2025.

⁶ Bulgarian Institute for Legal Initiatives, “Работната група ‘Task Force Covid-19’ проведе първото си заседание днес,” [The ‘Task Force Covid-19’ held its first meeting today] Facebook, 17 March 2023, <https://www.facebook.com/BulgarianInstituteForLegalInitiatives/posts/pfbid0kcSi16JEZYmqpgC3ZpaUdAyFWJMK7uWPhdbUrbhc3VWe9Sx4QMckTb2wQ9hAizel>.

⁷ Gyaurova-Wegertseder and Slavev, interview.

⁸ “Open Government Partnership 2022–2024, Good Governance and Anti-Corruption, Measure – Task Force COVID-19,” Bulgarian Institute for Legal Initiatives, 2023, <https://bili-bg.org/85/page.html>.

⁹ “Open Government Partnership 2022–2024, Good Governance and Anti-Corruption, Measure – Task Force COVID-19,” Bulgarian Institute for Legal Initiatives.

¹⁰ “COVID-19 Unified Information Portal, Republic of Bulgaria,” The Wayback Machine, http://web.archive.org/web/20220501000000*/https://coronavirus.bg/bg/merki.

¹¹ Bilyana Gyaurova-Wegertseder, executive director, and Teodor Slavev, expert of the Bulgarian Institute for Legal Initiatives, interview with IRM, 10 April 2025.

¹² Maria Tsankova, State Expert, Administration of the Council of Ministers, comments provided during the report’s pre-publication period, 15 August 2025; 2021 Bulgaria State Budget, https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.gov.bg%2Ffiles%2Fcommon%2FSTATE%2520BUDGET_2021-02.2022.docx&wdOrigin=BROWSELINK.

¹³ Gyaurova-Wegertseder and Slavev, interview.

¹⁴ “Open Government Partnership 2022–2024, Good Governance and Anti-Corruption, Measure – Task Force COVID-19,” Bulgarian Institute for Legal Initiatives.

¹⁵ Gyaurova-Wegertseder and Slavev, interview.

¹⁶ Gyaurova-Wegertseder and Slavev, interview.

¹⁷ “Bulgaria: Drought, rising temperatures main causes of drinking water supply problems – officials,” The Sofia Globe, 22 August 2024, <https://sofiaglobe.com/2024/08/22/bulgaria-drought-rising-temperatures-main-causes-of-drinking-water-supply-problems-officials>.

Section III. Participation and Co-Creation

Action plan co-creation introduced a novel depth of collaboration between government and civil society stakeholders, introducing clear commitment selection criteria, mandatory government and civil society partnerships, and several phases of commitment selection. However, frequent government changes negatively impacted civil society participation during implementation, despite the sustained efforts of the OGP team to engage with the changing leadership. Moving forward, stakeholders could consider ways to ensure that dialogue between government and civil society continues in times of political change.

OGP in Bulgaria

Bulgaria's participation in OGP is coordinated by the Administration of the Council of Ministers and its Coordination and Modernization of the Administration Directorate. This unit runs directly under the supervision of the Secretary General of the Council of Ministers and usually coordinates novel initiatives regarding the functioning of the state apparatus. As the OGP process does not have dedicated funding, each government lead independently secures implementation funding. During this action plan cycle, this contributed to the adoption of commitments in already planned and funded policy areas or policy areas expected to receive funding. Historically, commitments which are not included in the government's EU, national or other funding schemes are low on the government's bodies agendas and often do not get started or completed.¹

A permanent body, the Council for Coordination of Bulgaria's Participation in the Open Government Partnership Initiative, functions as Bulgaria's multi-stakeholder forum (MSF), the rules for which were adopted before the submission of the fourth action plan.² Comprised of government and civil society co-implementing partners, its term runs parallel to the duration of the action plan.³ During action plan co-creation, an interim MSF starts the process after being convened by a Deputy Prime Minister as government co-chair. The interim MSF consists of all civil society organizations (CSOs) and government bodies who have proposed commitments for the action plan or are asked to implement them. Once the action plan is adopted, the Council for Coordination of Bulgaria's Participation in the Open Government Partnership Initiative is convened, with participation of government and civil society organizations implementing commitments. During the action plan cycle, 10 government institutions and 11 CSOs were responsible for commitment implementation, with 14 more government bodies and CSOs identified as interested parties. Other than those working on transparency and accountability, rule of law, civic space, and public participation, new MSF members included animal rights and metrology CSOs.

Communications of government and MSF activities were carried out through the dedicated OGP section in the Public Consultations Portal.⁴ The government OGP team published information on co-creation, government self-assessment reports, IRM reports, and news about government leadership. The section was updated every two to three months. Additionally, they also used a dedicated Facebook account⁵ as well as a mailing list comprised of current and past OGP stakeholders to promote OGP-related activities and inform a larger audience on Bulgaria's OGP process.

Action Plan Co-Creation

Action plan co-creation started on 18 June 2021, when the government published a co-creation calendar and an invitation for commitment proposals on the national OGP website.⁶ The invitation was reposted six days later on the government's OGP Facebook page.⁷ Interested stakeholders had six weeks, until 30 July 2021, to submit their proposals.⁸ In September 2021, the government organized a public consultation on the 38 commitment proposals received, with non-binding voting on each proposal.⁹ The government also shared five criteria for proposals to meet on the public consultation notice, including the cooperation between a government institution and a CSO as part of commitment design, implementation, and monitoring.

Later in the fall, the government formed an interim MSF, structured in working groups. Its members were all government and civil society commitment proposers. The action plan was finalized through discussions in closed virtual meetings in November and December 2021. The government provided reasoned response in writing throughout the process and verbally during the final meeting of the interim MSF, explaining the reasons behind the final selection.¹⁰ The interim MSF voted to accept the final draft action plan in early December 2021 and published the draft for public consultation for one month.¹¹ The OGP process then stalled following parliamentary elections which produced a new government in December 2021,¹² with the action plan eventually adopted seven months later in July 2022.¹³

Overall, the drafting process depended on the cooperation between civil society and public bodies, as proposals were only included if they had partners from both sides. This was the most extensive OGP co-creation process,¹⁴ a first for Bulgaria, with the combination of three public consultations—one on gathering proposals and two on filtering them—with a discussion phase which went deeper into commitment formulation. In previous action plans co-creation processes, there was generally one public consultation and two-to three in person consultations. In addition, the criteria for commitment inclusion set by the government were accepted by all stakeholders and proved a successful instrument to filter and improve commitments in consensus.

Participation during Implementation

There were limited opportunities for civil society oversight of commitment implementation within the MSF due to political instability. Between December 2022 and December 2024, the country held four parliamentary elections and went through five changes of government.¹⁵ This meant that there were four different OGP political leads from four consecutive Councils of Ministers, as well as long periods where no political lead was appointed. According to the legislation governing the OGP process in the country, the political lead has to be a Deputy Prime Minister who also co-chairs the MSF.¹⁶ The government OGP team did not convene the MSF when there was no political lead, as according to Decree No. 132, the political lead is the only one who can initiate a meeting of the council.¹⁷ The OGP team noted that during that period they were in regular communication with commitment implementers to monitor implementation and provide updates to action plan milestones.¹⁸

The MSF met three times during action plan implementation in December 2022, December 2023, and November 2024. Each meeting was led by a different government co-chair due to the changes in government. During the December 2022 MSF meeting, three CSOs were elected as rotating co-chairs for eight months each.¹⁹ The December 2023 meeting focused on discussing commitment implementation in the format of a free and constructive dialogue between civil society, government implementers, and high-level government leadership on each commitment. The November 2024 meeting also focused on discussing commitment implementation.

Outside of commitment implementation discussions within the MSF, the government organized a public discussion in May 2023 which was attended by government actors and CSOs beyond MSF members.²⁰ Government and civil society provided updates and openly discussed Commitments 4, 6, 11, 12, and 14, which was covered by the media and streamed online.²¹

Overall, the level of engagement and dialogue in the MSF during implementation between government and civil society was comparable to previous action plans. This can be at least partially attributed to the stability of the OGP team in the Administration of the Council of Ministers and their sustained efforts to follow through with the action plan and Bulgaria’s engagement with open government. Given the difficulties caused by political instability during action plan implementation, this is a success. Another factor which contributed to ongoing dialogue between government and civil society was the appointment of implementers from both government and civil society for each commitment.

The IRM uses the OGP Participation and Co-Creations Standards to assess countries’ participatory practices throughout the action plan cycle.²² Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.²³ The OGP Criteria and Standards Subcommittee determines if a country has acted according to OGP process.²⁴

Table 2. Compliance with Minimum Requirements

Minimum requirement	Co-creation	Implementation
<p>1.1 Space for dialogue: The Council for Coordination of Bulgaria’s Participation in the Open Government Partnership Initiative functioned as the country’s multi-stakeholder space for dialogue. Its basic rules are set in the Decree No. 132 of the Council of Ministers of 2021 published in the State Gazette.²⁵</p> <p>The minimum requirement states that countries should have a space for ongoing dialogue, with participation from both government and civil society members, which meets at least every six months. The Council for Coordination of Bulgaria’s Participation in the Open Government Partnership only met three times—in December 2022, December 2023, and November 2024, with an additional public event to discuss implementation held in May 2023. As there was a 7-month gap between the May and December 2023 meetings and an 11-month gap between the December 2023 and November 2024 meetings, the minimum requirement is assessed as not being met.</p>	No	No
<p>2.1 OGP website: The Public Consultations Portal has a dedicated section for Bulgaria’s participation in OGP, which contains all official announcements, self-assessment reports, IRM reports, and adopted national action plans, including the latest one.²⁶</p>	Yes	Yes
<p>2.2 Repository: The Public Consultations Portal has a dedicated section for Bulgaria’s participation in OGP that provides information on OGP action plan co-creation and implementation. It was updated every two to three months.</p>	Yes	Yes
<p>3.1 Advanced notice: See the Action Plan Review.²⁷</p>	Yes	Not applicable
<p>3.2 Outreach: See the Action Plan Review.</p>	Yes	Not applicable
<p>3.3 Feedback mechanism: See the Action Plan Review.</p>	Yes	Not applicable
<p>4.1 Reasoned response: See the Action Plan Review.</p>	Yes	Not applicable

<p>5.1 Open implementation: There were four government-civil society meetings to provide commitment implementation updates and collect civil society comments: three in December 2022, December 2023, and November 2024, and an additional public event to discuss implementation in May 2023.</p>	Not applicable	Yes
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¹ See the not started commitments in: “IRM: Bulgaria End-of-Term Report 2016–2018,” Open Government Partnership, 29 July 2019, <https://www.opengovpartnership.org/documents/bulgaria-end-of-term-report-2016-2018>.

² “Постановление № 132 от 5 април 2021 г. за координация на участието на Република България в глобалната инициатива ‘Партньорство за открито управление’ (Обн. ДВ. бр.29 от 9 Април 2021г., изм. ДВ. бр.19 от 7 Март 2025г),” [Decree No. 132 of the Council of Ministers of 2021 (COM No. 132 of 2021)], Ciela, 5 April 2021, <https://www.ciela.net/svobodna-zona-darjaven-vestnik/document/2137211405/issue/6390/postanovlenie-%E2%84%96-132-ot-5-april-2021-g-za-koordinatsiya-na-uchastieto-na-republika-balgariya-v-globalnata-initsiativa->.

³ “Decree No. 132 of the Council of Ministers of 2021 (COM No. 132 of 2021),” Ciela.

⁴ “Партньорство за открито управление,” [Open Government Partnership], Public Consultations Portal, <https://www.strategy.bg/Articles/List.aspx?lang=bg-BG>.

⁵ “Open Government Partnership,” Facebook <https://www.facebook.com/profile.php?id=100069203799886>.

⁶ “Започва подготовката на Четвъртия национален план за действие на Република България в рамките на глобалната инициатива ‘Партньорство за открито управление’,” [Preparation of the Fourth National Action Plan of the Republic of Bulgaria within the framework of the global initiative ‘Open Government Partnership’ begins], Public Consultations Portal, 18 June 2021, <https://www.strategy.bg/Articles/View.aspx?lang=bg-BG&categoryId=&Id=38&y=&m=&d=>; “Стартира събирането на предложения за четвъртия национален план за действие на Република България в рамките на глобалната инициатива ‘Партньорство за открито управление’,” [The collection of proposals for the fourth national action plan of the Republic of Bulgaria within the framework of the global initiative ‘Open Government Partnership’ has been launched], Public Consultations Portal, 18 June 2021, <https://www.strategy.bg/Articles/View.aspx?lang=bg-BG&categoryId=&Id=39&y=&m=&d=>.

⁷ “Стартира събирането на предложения за четвъртия национален план за действие на Република България в рамките на глобалната инициатива ‘Партньорство за открито управление’,” [The collection of proposals for the fourth national action plan of the Republic of Bulgaria within the framework of the global initiative ‘Open Government Partnership’ has been launched], Facebook, 24 June 2021, https://www.facebook.com/permalink.php?story_fbid=pfbid02HtYLubRAcunuRogBmEmDjfbHyDmo2fkHZg8JntQwAp2k2drBvk1JuZ6dtMkXPbPKI&id=260225677393242.

⁸ “The collection of proposals for the fourth national action plan of the Republic of Bulgaria within the framework of the global initiative ‘Open Government Partnership’ has been launched], Public Consultations Portal.

⁹ “Обществено обсъждане на получените предложения за мерки за Четвъртия национален план за действие в рамките на инициативата ‘Партньорство за открито управление’,” [Public consultation on the received proposals for measures for the Fourth National Action Plan within the framework of the Open Government Partnership initiative], Public Consultations Portal, 1–30 September 2021, <https://www.strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&Id=6327>.

¹⁰ “IRM Action Plan Review: Bulgaria 2022–2024,” Open Government Partnership, July 2023, https://www.opengovpartnership.org/wp-content/uploads/2023/07/Bulgaria_Action-Plan-Review_2022-2024_EN.pdf.

¹¹ “Обществено обсъждане на предложенията за мерки в Четвъртия национален план на Република България в инициативата ‘Партньорство за открито управление’,” [Public discussion of the proposals for measures in the Fourth National Plan of the Republic of Bulgaria in the ‘Open Government Partnership’ initiative], Public Consultations Portal, 10 December 2021–10 January 2022, <https://www.strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&Id=6538>.

¹² “Bulgaria: Centrist party leader to form government,” Deutsche Welle, 11 December 2021, <https://www.dw.com/en/bulgaria-anti-corruption-party-leader-asked-to-form-government/a-60090571>.

¹³ “Правителството прие Четвъртия национален план за участието на България в глобалната инициатива ‘Партньорство за открито управление’, вицепремиерът Калина Константинова ще ръководи Съвета за координация на изпълнението,” [The Government adopted the Fourth National Plan for Bulgaria’s participation in the global initiative ‘Open Government Partnership’, Deputy Prime Minister Kalina Konstantinova will lead the Implementation Coordination Council], Public Consultations Portal, 21 July 2022, <https://www.strategy.bg/Articles/View.aspx?lang=bg-BG&categoryId=&Id=40&y=&m=&d=>.

¹⁴ “IRM Progress Report 2014–2015: Bulgaria,” Open Government Partnership, 8 July 2016, <https://www.opengovpartnership.org/documents/bulgaria-irm-progress-report-2014-2015>; “Bulgaria Mid-Term Report 2016–2018,” Open Government Partnership, 30 June 2018, <https://www.opengovpartnership.org/documents/bulgaria-mid-term-report-2016-2018-year-1>.

¹⁵ “Self-assessment report on the implementation of the Fourth Action Plan of the Republic of Bulgaria under the Open Government Partnership initiative July 2022–December 2024,” Public Consultations Portal, 21 January 2025, <https://www.strategy.bg/FileHandler.ashx?fileId=38867>.

¹⁶ “Decree No. 132 of the Council of Ministers of 2021 (COM No. 132 of 2021),” Ciela.

¹⁷ Maria Tsankova, state expert, and Ralitsa Velichkova, chief expert, OGP team, “Modernization of the administration” directorate in the Administration of the Council of Ministers, interview with IRM, 7 March 2025.

¹⁸ Ralitsa Velichkova, Chief Expert, Administration of the Council of Ministers, comments provided to the IRM during the report’s pre-publication period, 15 August 2025.

¹⁹ “Три неправителствени организации ще бъдат съпредседатели на ротационен принцип на Съвета по координация за изпълнението на Четвъртия национален план по инициативата ‘Партньорство за открито управление’,” [Three non-governmental organizations will be co-chairs on a rotating basis of the Coordination Council for the Implementation of the Fourth National Plan under the Open Government Partnership Initiative], Public Consultations Portal, 15 December 2022, <https://www.strategy.bg/Articles/View.aspx?lang=bg-BG&categoryId=&Id=43&y=&m=&d=>.

²⁰ “България се включва в Седмицата на откритото управление по глобалната инициатива ‘Партньорство за открито управление’,” [Bulgaria joins Open Government Week under the global initiative ‘Open Government Partnership’], Public Consultations Portal, 11 May 2023, <https://www.strategy.bg/Articles/View.aspx?lang=bg-BG&categoryId=&Id=45&y=&m=&d=>.

²¹ “България се включва в Седмицата на откритото управление,” [Bulgaria participates in the Open Government Week], 24 Chasa, 10 May 2023, <https://www.24chasa.bg/bulgaria/article/14425170>.

²² “OGP Participation and Co-Creation Standards,” Open Government Partnership, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.

²³ “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf.

²⁴ On 1 August 2025, the OGP Criteria and Standards Subcommittee adopted a resolution on Temporary Suspension of the Enforcement of Time-Bound Minimum Requirements for Participation and Co-Creation, for all members currently implementing plans delivered on or after 1 January 2024. <https://www.opengovpartnership.org/wp-content/uploads/2025/08/Resolution-of-CS-on-the-Temporary-Suspension-of-the-Enforcement-of-Time-Bound-Minimum-Requirements-2.pdf>; For information on the OGP Procedural Review Policy see: <https://www.opengovpartnership.org/procedural-review/#IC>.

²⁵ “Decree No. 132 of the Council of Ministers of 2021 (COM No. 132 of 2021),” Ciela.

²⁶ “Партньорство за открито управление,” [Open Government Partnership], Public Consultations Portal, <https://www.strategy.bg/Articles/List.aspx?lang=bg-BG>

²⁷ “IRM Action Plan Review: Bulgaria 2022–2024,” Open Government Partnership, 11 July 2023, <https://www.opengovpartnership.org/documents/bulgaria-action-plan-review-2022-2024>.

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector,
 - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Stephan Anguelov and was reviewed by Andy McDevitt, IRM external expert. According to Bulgaria’s fourth action plan, the NGO Access to Information Programme is an interested party in Commitment 1 and a partner in implementation for Commitment 2. Because the IRM researcher is under contract for legal services with the NGO Access to Information Programme, and to avoid potential conflict of interest, IRM staff carried out the assessment of the implementation of Commitments 1 and 2 in this Results Report. The IRM methodology, quality of IRM products and review process is overseen by the IRM’s International Experts Panel (IEP).³ For more information, refer to IRM webpage⁴ or the glossary of IRM and OGP terms.⁵

¹ For definitions of OGP terms, such as co-creation and promising commitments, see “OGP Glossary,” <https://www.opengovpartnership.org/glossary/>.

² The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “Potential for Results” and “Early Results” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

³ “International Experts Panel,” Open Government Partnership, Independent Reporting Mechanism, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>.

⁴ “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview/>.

⁵ “OGP Glossary,” Open Government Partnership, <https://www.opengovpartnership.org/glossary/>.

Annex I. Commitment Data¹

Commitment 1: Review of the Conceptual Framework for Open Governance	
<ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest 	<ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results
<p>The commitment aimed to review strategic documents' relevance to open government principles. The commitment originally aimed to conduct a multi-stakeholder review of existing strategic documents and action plans, to produce proposals to update them including open government principles, and to prepare for the creation of a new open government strategy.² However, during implementation, the Administration of the Council of Ministers decided that enshrining open government principles in the Methodology for Developing Strategic Documents, the main document used in planning, preparing, and adopting strategic documents, would be a more appropriate solution.³ The Administration of the Council of Ministers and the Bulgarian Center for Non-Profit Law (BCNL) as civil society co-implementer convened a multi-stakeholder working group. The working group had 6 government and 5 civil society representatives according to the rules and selection by BCNL and met three times.⁴ The group developed definitions of the principles of open governance to be included in the Methodology for Developing Strategic Documents. Concurrently to the development of the definitions, a draft Strategic Planning Act was developed. The working group decided to submit the open government principles to the Strategic Planning Directorate in the Administration of the Council of Ministers for inclusion in the draft act. In September 2025, the Deputy Prime Minister responsible for the OGP process submitted the renewed Methodology for Developing Strategic Documents, which includes open government principles, for adoption by the government.⁵ As open government principles were not included in neither the methodology nor the draft act during the action plan implementation period, the commitment is assessed as having had no notable results in opening government at the time of assessment.</p>	
Commitment 2: Implementation of the Standards of the Council of Europe Convention on Access to Official Documents	
<ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest 	<ul style="list-style-type: none"> • Completion: Limited • Early results: Moderate Results
<p>The commitment sought to introduce legislative changes to bring Bulgaria in line with the Council of Europe's Convention on Access to Official Documents (CETS 205). The commitment originally aimed to prepare a conformity analysis to the convention requirements and current Bulgarian legislation, formulate proposals for legislative changes based on the conformity analysis and organize public discussions on them, and create an interdepartmental working group to prepare for accession to the convention.⁶ In September 2023, amendments to the</p>	

Law on Access to Public Information broadened the range of public entities required to provide information, strengthened public body obligations to regularly and freely publish information on their websites, and expanded the amount of information to be published on the Access to Public Information Platform.⁷ As the civil society partner of this commitment, the Access to Information Program prepared a compliance analysis of the provisions of the Access to Public Information Act, including amendments passed in 2023, and of other transparency laws with the provisions of the convention in May 2024, concluding that Bulgaria meets the requirements and standards for ensuring accession to the convention.⁸ As the conformity analysis concluded that there is no need for legal changes, proposals for legislative changes were not prepared and publicly discussed nor did the interdepartmental working group prepare for the accession of Bulgaria to the convention.⁹

Commitment 3: National Assessment of Internet Development

- | | |
|--|---|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: No Notable Results |
|--|---|

Commitment 3 focused on assessing internet development and governance in Bulgaria under UNESCO’s Internet Universality Indicators according to the Rights, Openness, Accessibility, and Multi-Stakeholder (ROAM) principles of participation.¹⁰ Seven of the eight milestones were completed during implementation, including the establishment of a multi-stakeholder advisory board with joint academia and civil society membership and preparation of the report. In October 2024, the Ministry of Electronic Governance held the national workshop for validation of the results onsite.¹¹ The final version of the assessment of internet development in Bulgaria was published in February 2025, after the end of implementation.¹² The report analyzes the internet environment, policies, and legal framework to assess compliance with UNESCO’s ROAM principles and offers a list of general recommendations for the government, businesses, non-governmental organizations, and academia. According to the government, the recommendations will be used to prepare the new 2030 Digital Transformation Strategy.¹³ As the recommendations do not include specific target stakeholders, milestones, and timelines for implementation, the commitment is assessed as having no notable results in opening government at the time of assessment.

Commitment 4: Public Dialogue on Common Standards in the Use of Artificial Intelligence

- | | |
|--|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
|--|--|

Commitment 4 aimed to develop government standards for artificial intelligence (AI) in order to ensure equal access and respect for human rights. It builds upon the 2020 Concept for AI development in Bulgaria 2030, a policy paper adopted by the government which lays out principles for a risk-based and risk assessment-based framework for AI governance.¹⁴ According to a civil society representative,¹⁵ the Ministry of Electronic Governance created a

working group comprised of government experts, civil society activists, and IT business representatives in 2024. The working group agreed on some initial rules for its work and the public consultation on AI standards but stopped convening following a change of government later in the year.¹⁶ As such, the two remaining milestones were not completed. Overall, as commitment implementation did not produce the common standards for the use of AI in digitization process, nor did it lead to the organization of public dialogues on the topic, the commitment is assessed as having no notable results in opening government at the time of assessment.

Commitment 5: Public Control during Inspections in Animal Breeding Facilities

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|--|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
|--|--|

Commitment 5 aimed to implement the legal obligation for civil society control during inspections in livestock and other animal breeding facilities. These stem from legal requirements that are systematically not applied.¹⁷ The commitment aimed to prepare analysis of the effects of applying the present legislation, developing amendments to relevant legislation, conducting public debates on the topic, and submitting the amendments to the Council of Ministers for consideration and adoption.¹⁸ While civil society organizations and representatives of the Ministry of Agriculture and Food exchanged views on the commitment, none of the commitment milestones were completed due to lack of constructive dialogue.¹⁹ According to the Ministry of Agriculture and Food, public control of animal inspections is already regulated in the Veterinary Medical Activities Act, in compliance with the requirements for animal welfare and protection by the Bulgarian Food Safety Agency.²⁰ Since the legal status quo remains unchanged and the cited legal obligations for civil society control during inspections currently remain not applied, the commitment is assessed as having no notable results in opening government at the time of assessment.

Commitment 6: COVID-19 Task Force

- | | |
|---|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Substantial | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate Results |
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This commitment is assessed in Section II above.

Commitment 7: Construction of a National Metrological Network

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| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? No ● Potential for results: Unclear | <ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results |
|--|--|

Under Commitment 7, the Bulgarian Institute of Metrology (BIM) aimed to construct a national metrological network and publish data of reference and auxiliary equipment in order to increase the reliability of measurements, reduce processing time, and limit possibilities of

manipulation. The first and second milestones on constructing a centralized monitoring system and an authorized access system were completed.²¹ These systems are internal for each lab and BIM provides them as ready services that can be adopted in each private or public lab. The third, fourth, and fifth milestones were not completed due to obstacles in implementing the systems in private laboratories, particularly the lack of sensors which can transmit data to the centralized register. Furthermore, the commitment implementation did not clarify the commitment’s relevance to open government. As a result, the commitment is coded as having no notable results in opening government at the time of assessment.

Commitment 8: Publication of Information on the Open Data Portal

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|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: Moderate Results |
|--|---|

Commitment 8 aimed to publish new information on the implementation of the state budget and the state of the fiscal reserve in the Open Data Portal by the Ministry of Finance on a monthly basis. It also sought to publish the public part of the Register of Museums by the Ministry of Culture in open format. The commitment continued efforts to promote open government data use and publish new open data sets from the previous three action plans.

Overall, commitment implementation was completed. The Ministry of Finance now publishes monthly open data on the state budget’s execution and fiscal reserve on the national Open Data Portal—among 47 other open data sets.²² On the same portal, the Ministry of Culture published the Register of Museums in open format.²³ The International Budget Partnership highlighted Bulgaria’s progress in budget transparency as the country improved its standing in the 2023 Open Budget Survey.²⁴

Commitment 9: Study of the Needs of Citizens and Businesses for Public Sector Open Data

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Substantial • Early results: No Notable Results |
|--|--|

Commitment 9 aimed to assess the impact and opportunities of Bulgaria’s open data policy as well as analyze the reasons for low levels of civic participation in the policy. Milestones included formulating requirements for a methodology, developing the methodology, conducting a sociological survey, preparing a comparative analysis, and discussing the results to prepare recommendations and a facilitated mechanism for conducting regular surveys and observations of the needs of citizens and businesses. By the end of 2024, two of the three milestones were completed.²⁵ Moving forward, the Ministry of E-Governance aims to publish datasets of interest to citizens and businesses on an annual basis, after conducting periodic needs assessments.²⁶ As the completed commitment milestones pertained to research and analysis activities with no concrete steps for implementation, the commitment is assessed as having no notable results in opening government at the time of assessment.

Commitment 10: Changes to the Law on Direct Citizen Participation in State Power and Local Self-Government

- **Verifiable:** Yes
- **Does it have an open government lens?**
Yes
- **Potential for results:** Modest

- **Completion:** Limited
- **Early results:** No Notable Results

The commitment represented a long-standing civil society goal to reform the Direct Participation of Citizens Act through a participatory process. Proposed by the Citizen Participation Forum, the commitment included lowering thresholds for organizing local and national referenda, introducing modern means for organizing mandatory citizen initiatives and referenda documentation, broadening possibilities for accepting signatures online, enhancing information on available choices and expected outcomes in referendum campaigns, and mitigating the risks of populism or disinformation taking hold of these instruments through better information campaigns.²⁷ A discussion on the commitment was held at the meeting of the action plan’s Coordination Council on 19 December 2023.²⁸ The Administration of the Council of Ministers considered that changes to this law are traditionally initiated by the National Assembly, because they regulate a matter related to the constitutional rights of citizens. As a result, there was little cooperation between the government and civil society on the draft law. With no working group formed, information campaign was limited to the efforts of civil society while public consultation on the draft law was limited to the extent of exchanging statements by different but mostly civil society stakeholders on the website of the National Assembly. Thus, the implementation of Milestones 1, 4, and 5 was limited. However, on 1 March 2024, a draft law of amendments covering and adopting civil society proposals—including broader than usual reasons and a deep analysis of the legislation—was introduced by members of parliament.²⁹ As the draft law did not reach the parliamentary committee’s second hearing, the commitment is assessed as having no notable results in opening government at the time of assessment.

Commitment 11: Improving the Regime of Volunteering

- **Verifiable:** Yes
- **Does it have an open government lens?**
Yes
- **Potential for results:** Modest

- **Completion:** Complete
- **Early results:** No Notable Results

Commitment 11 aimed to draft a new Law on Volunteers through participatory processes. The commitment initially included a central role for the Council for the Development of Civil Society in the drafting and implementing process. However, in June 2023, the Ministry of Youth and Sports became the lead implementer.³⁰ According to a civil society activist,³¹ the ministry along with CSOs completed the first four milestones by forming a working group with a variety of government and civil society stakeholders, preparing a study and a consultation document on the subject,³² and—after a preliminary impact assessment—drafting a proposition for a Volunteering Act and organizing a public discussion of it in 2024³³ along with coordination between government bodies. The draft was not adopted by the Council of Ministers due to the change of governments in April 2024. However, the bill was submitted to the National Assembly by a group of members of parliament in late 2024.³⁴ Hence, the

implementation, though taking a different route, is completed as the commitment had been written. The civil society activist considers the proposed draft as a serious step forward for supporting and promoting volunteering because it covers contemporary challenges such as social security and retirement, insurance, recognition of labor experience, and specific short-term contracts concerning volunteers. However, it has not been adopted and is in competition with two other drafts for a Volunteering Act proposed by other members of parliament at the time of writing.³⁵ History on the National Assembly’s website shows that 14 drafts of such a law have been introduced since 2012 in the National Assembly, and so far none has been adopted.

Commitment 12: Developing a Template for Online Petitions

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens?
Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Not Started • Early results: No Notable Results |
|--|--|

Under Commitment 12, the Ministry of Electronic Governance and the Bulgarian Center for Non-Profit Law (BCNL) aimed to develop a template for online petitions through a tool for state institutions to receive requests from citizens, identify problems to solve through petitions, and legally sign petitions online.³⁶ Commitment implementation was not started as the Ministry of Electronic Governance considered the introduction of electronic identification for Bulgarian citizens a pre-requisite for commitment implementation. While e-identification through ID cards remains unavailable, many institutions like the National Revenue Agency (NRA) use personal identification codes, which are a simple, privacy-friendly, and secure solution for online identification. By 2024, the NRA had issued 1.8 million ID codes, albeit covering only slightly more than a quarter of the 6.4 million Bulgarians. The NRA’s personal ID codes are also used by other institutions.³⁷ As commitment implementation did not start, the commitment is assessed as having no notable results in opening government at the time of assessment.

Commitment 13: Participation of Non-Governmental Organizations in Resolving Disputes between Consumers and Traders in Connection with CPC

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens?
Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Not Started • Early results: No Notable Results |
|--|--|

The commitment aimed to develop and test a procedure for outsourcing the provision of advice and arbitration on consumer complaints involving disputes with traders to CSOs. The commitment aimed to include civil society at the design and testing phases of this initiative to co-create an impact assessment for a future proposal to amend consumer protection legislation. Commitment implementation did not start, as after the adoption of the action plan the government changed and the new leadership of the lead implementer, the Commission for Consumer Protection no longer considered this commitment a priority. As commitment implementation did not start, the commitment is therefore assessed as having no notable results in opening government at the time of assessment.

Commitment 14: Forums for Public Discussion of the Education Quality Inspection Framework

- | | |
|--|---|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Complete • Early results: No Notable Results |
|--|---|

Commitment 14 aimed to involve CSOs to participate in a consultative body on education. It was based on an OECD recommendation to build a new evaluation and assessment framework to achieve a common understanding of school quality.³⁸ Implementation of commitment milestones was completed jointly by the National Inspectorate of Education and the CSO National Children Network. The National Children Network prepared a survey on the perceptions of parents and students on the quality of education.³⁹ The National Inspectorate of Education organized a national conference in June 2024,⁴⁰ which sought to find the intersections between the opinions of five stakeholder groups: (1) the civil sector, (2) parents, (3) students and undergraduates, (4) teachers, principals, and institutions, and (5) syndicates.⁴¹ At the end of the discussions, proposals were put forward to be incorporated into the draft bylaw—a future Ordinance on the Quality of Education—and in the work of the inspectorate.⁴² However, such an ordinance has not been adopted yet.⁴³ The implementation of the commitment saw a public discussion with multiple stakeholders on a future improved framework for evaluation and assessment of education but did not see the adoption of the bylaw which would institute the framework. The draft bylaw itself has not been published even though the then-Minister of education declared that it had already been prepared.⁴⁴ According to the government, a working group has been established to prepare the draft ordinance to introduce a quality framework.⁴⁵

¹ Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see Bulgaria's action plan: https://www.opengovpartnership.org/wp-content/uploads/2022/07/Bulgaria_Action-Plan_2022-2024_December_EN.pdf.
3. For more information on the assessment of the commitments' design, see Bulgaria's Action Plan Review: https://www.opengovpartnership.org/wp-content/uploads/2023/07/Bulgaria_Action-Plan-Review_2022-2024_EN.pdf

² Council of Ministers, "The Republic of Bulgaria Fourth National Action Plan: Open Government Partnership Initiative," Open Government Partnership.

³ "Self-assessment report on the implementation of the Fourth Action Plan of the Republic of Bulgaria under the Open Government Partnership initiative July 2022–December 2024," Public Consultations Portal, 21 January 2025, <https://www.strategy.bg/FileHandler.ashx?fileId=38867>.

⁴ Ralitsa Velichkova (Chief Expert, Administration of the Council of Ministers), correspondence with IRM, 17 April 2025.

⁵ Maria Tsankova, State Expert, Administration of the Council of Ministers, comments provided to the IRM during the report's public comment period, 23 September 2025.

⁶ Council of Ministers, "The Republic of Bulgaria Fourth National Action Plan: Open Government Partnership Initiative," Open Government Partnership.

⁷ "Fifth evaluation round: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies: Compliance report – Bulgaria," Group of Stages against Corruption, February 2025, <https://rm.coe.int/grecorc5-2024-14-final-eng-compliance-report-bulgaria-public/1680b3f2d1>.

⁸ “Fifth evaluation round: Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies: Compliance report – Bulgaria,” Group of Stages against Corruption; Report for Compliance of the Access to Public Information Act with the Council of Europe Convention on Access to Official Documents, Access to Information Programme, October 2024, https://store.aip-bg.org/stanovishta/2025/Report_consistency_ZDOI_18-10-24_Eng.pdf.

⁹ Maria Tsankova (State Expert, Administration of the Council of Ministers), correspondence with IRM, 17 April 2025; Velichkova, correspondence.

¹⁰ “ROAM-X Indicators,” UNESCO, accessed 18 April 2025, <https://www.unesco.org/en/internet-universality-indicators/roam-x>.

¹¹ “Assessment of internet development in Bulgaria through UNESCO’s internet universality indicators framework, Ministry of Electronic Governance, Civil Society (Consortium) ‘Law, Internet, Media, Communications and Culture’,” Ministry of Electronic Governance, 13 February 2025, https://egov.government.bg/wps/wcm/connect/egov.government.bg-2818/8782e112-f26c-47db-b7f9-ed5ee2d86451/report_EN%2Bfinal.docx?MOD=AJPERES&CVID=pmAClea; Anelia Dimova, Comment provided to the IRM during the report’s public comment period, 19 September 2022.

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¹³ Maria Tsankova, State Expert, Administration of the Council of Ministers, comments provided to the IRM during the report’s pre-publication period, 15 August 2025.

¹⁴ “Концепция за развитието на изкуствения интелект в България до 2030 г,” [Concept for AI development in Bulgaria 2030], Ministry of Electronic Governance, 7 November 2022, <https://egov.government.bg/wps/portal/ministry-meu/strategies-policies/digital.transformation/itis-national-strategic-documents/ai.development.concept.2030>.

¹⁵ Zahary Yankov (Legal Expert, Bulgarian Center for Not-for-Profit Law), interview by IRM, 21 March 2025.

¹⁶ Yankov, interview.

¹⁷ Observations expressed by the representative of the Campaigns and Activism for Animals in the Industry association in the meeting of the Council on Coordination on OGP attended by IRM, 15 December 2022; Art. 57 in connection with Art. 58, Item 5 of the Animals Protection Law and Art. 170, Para. 2 of the Veterinary Law.

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¹⁹ “Напредък в областта на отвореното управление отчита Докладът за самооценка на изпълнението на Четвъртия план за действие на България по инициативата ‘Партньорство за открито управление’,” [Progress in the field of open government is reported in the Self-Assessment Report on the Implementation of Bulgaria’s Fourth Action Plan under the Open Government Partnership Initiative], Public Consultations Portal, 21 January 2025, <https://www.strategy.bg/Articles/View.aspx?lang=bg-BG&categoryId=&id=52&y=&m=&d=>.

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²⁷ Georgi Petrov (Executive Director, Citizen Participation Forum), interview by IRM, 7 December 2022.

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