



NGO: EUROPEAN CENTRE FOR LAW AND JUSTICE (ECLJ)

**UNIVERSAL PERIODIC REVIEW
50TH SESSION**

**STATUS OF HUMAN RIGHTS IN THE REPUBLIC OF BULGARIA
FOR THE 50TH SESSION OF THE
UNIVERSAL PERIODIC REVIEW**

*www.ECLJ.org
4, quai Koch
67000 Strasbourg, France*

Status of Human Rights in Bulgaria for the 50th Session of the Universal Periodic Review

Introduction

1. The European Centre for Law and Justice (ECLJ) is an international, non-governmental organization dedicated to promoting and protecting human rights around the world. The ECLJ also holds Special Consultative status before the United Nations Economic and Social Council. This report discusses the status of human rights in the Republic of Bulgaria (Bulgaria) for the 50th session of the Universal Periodic Review (UPR).

Background

2. Bulgaria is a country in southeastern Europe and is located on the Balkan Peninsula.¹ Its population is approximately 6.3 million.² Approximately 59.4% of the population identifies as Eastern Orthodox, 7.8% as Muslim, 1.7% belong to various Christian denominations, and 27.4% as unspecified.³

3. Bulgaria's last review was held on November 6, 2020.⁴ As a result of the review, Bulgaria received 233 recommendations, 193 of which it supported.⁵ It was recommended by Liechtenstein, and supported by Bulgaria, that the government “[c]ontinue its efforts to combat trafficking in human beings and protect victims of trafficking.”⁶

4. In our last UPR on Bulgaria we expressed our concern over a proposed law that would restrict religious services to being carried out only by Bulgarian citizens that received training in Bulgaria or from an approved foreign school. The law would also have established a membership quota to obtain legal status. Thankfully, this measure failed before Bulgaria's last UPR and there have been no proposed measures to further restrict religious freedom. Additionally, while religious organizations can legally register with the government, registration is not a requirement for carrying out religious activities.⁷

¹ John D. Bell and et al., *Bulgaria*, BRITANNICA, <https://www.britannica.com/place/Bulgaria> (updated Apr. 3, 2025).

² *Id.*

³ *Bulgaria Demographics Profile*, INDEX MUNDI, https://www.indexmundi.com/bulgaria/demographics_profile.html (last updated Sept. 18, 2021).

⁴ *Universal Periodic Review – Bulgaria*, OHCHR, <https://www.ohchr.org/en/hr-bodies/upr/bg-index> (last visited Apr. 3, 2025).

⁵ *Bulgaria – Infographic*, OHCHR, <https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session36/BG/infographic-BULGARIA.pdf>.

⁶ OHCHR, UPR of Bulgaria (3rd Cycle – 36th Session) Thematic List of Recommendations, https://www.ohchr.org/sites/default/files/lib-docs/HRBodies/UPR/Documents/Session36/BG/UPR36_Bulgaria_Thematic_List_of_Recommendations.docx.

⁷ *Case of Independent Orthodox Church and Zahariev v. Bulgaria (European Court of Human Rights) Application no. 76620/14*, LAW EURO, <https://laweuro.com/?p=14429> (last updated Apr. 20, 2021).

Legal Framework

5. Under Article 159A of Bulgaria’s Criminal Code:

(1) Anyone, who recruits, transports, conceals or admits particular individuals or groups of people with the purpose of using them for debauched activities, forceful labour, dispossession of bodily organs or keeping them in forceful subjection, regardless of their consent, is subjected to penalty of imprisonment for a term from two to eight years and a fine from three to twelve thousand BGN.

(2) When the act under para.1 has been committed:

1. with regard to an individual who is under the age of eighteen years;
2. through the use of force or by misleading the individual;
3. through kidnapping or illegal deprivation of liberty;
4. through making use of a status of dependency;
5. through the abuse of power;
5. through promising, giving or receiving benefits, the punishment is imprisonment for a term from three to ten years and a fine from ten to twenty thousand BGN.

(3) Where the act under Para 1 has been committed in respect to a pregnant woman with the purpose of selling her child, the punishment is imprisonment for a term from three to fifteen years and a fine from twenty to fifty thousand BGN.⁸

6. Moreover, according to Article 8 of the ICCPR, “[n]o one shall be held in slavery; slavery and the slave-trade in all their forms shall be prohibited. No one shall be held in servitude.”⁹

7. Bulgaria is also a party to the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime.¹⁰ Under Article 9 sec. 1 of this Protocol:

1. States Parties shall establish comprehensive policies, programmes and other measures:

(a) To prevent and combat trafficking in persons; and

⁸ CRIMINAL CODE OF BULGARIA art. 159a,

https://www.cms.int/sites/default/files/document/cms_nlp_bgr_criminal_code_1968.pdf.

⁹ International Covenant on Civil and Political Rights art. 8, *adopted* Dec. 16, 1966, 999 U.N.T.S. 171, <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-civil-and-political-rights> [hereinafter ICCPR].

¹⁰ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime, UNITED NATIONS TREATY COLLECTION, https://treaties.un.org/pages/viewdetails.aspx?src=ind&mtdsg_no=xviii-12-a&chapter=18 (last visited Apr. 3, 2025).

(b) To protect victims of trafficking in persons, especially women and children, from revictimization.¹¹

Human Trafficking

8. Bulgaria largely serves as a country of origin for human trafficking, where victims are often trafficked to other countries in Western Europe.¹² More than 10,000 people are trafficked from Bulgaria to other parts of the world every year.¹³ In Bulgaria, sex trafficking involving children and women is the primary form of human trafficking.¹⁴ Children are trafficked for sex within the country, throughout Europe, the Middle East, and the United States.¹⁵ Women are often trapped in a life of prostitution because they are poor and are promised jobs abroad.¹⁶ 90% of the Bulgarian women trapped in prostitution in Western Europe are of Roma or Turkish descent.¹⁷ In 2023, Bulgaria's prosecutor's office reported that forty-nine women were identified as victims of sexual exploitation.¹⁸ However, there has been an increase in human trafficking for labor exploitation, especially among men.¹⁹ Bulgarian men and boys are subjected to labor exploitation in agriculture, construction, or the service sector.²⁰

9. Even though sex trafficking is the predominant form of human trafficking in Bulgaria, trafficking for forced labor still exists. In 2023, the prosecutor's office reported that 14 women and 25 men were victims of labor exploitation.²¹

10. Below we have highlighted some recent examples of individuals being trafficked in Bulgaria.

11. On January 21, 2025, it was reported that the Bulgarian border police charged four men involved in migrant trafficking.²² These migrants were from Morocco.²³

¹¹ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime, art. 9 § 1, *adopted* Nov. 15, 2000, <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>.

¹² Matey Todorov, *Bulgaria Remains Country of Origin for Victims of Human Trafficking to Western Europe*, BULGARIAN NEWS AGENCY (July 27, 2024), <https://www.bta.bg/en/news/715731-bulgaria-remains-country-of-origin-for-victims-of-human-trafficking-to-western-e>.

¹³ Courtney McCahan, *Women on Mission – December Update*, FIRST BAPTIST CHURCH BLAIRSVILLE (Dec. 11, 2024), <https://www.fbcvision.com/2024/12/women-on-mission-december-update/>.

¹⁴ Petya Petrova, *Labour Exploitation Victims Increase*, BULGARIAN NEWS AGENCY (Oct. 19, 2024, 2024), <https://www.bta.bg/en/news/bulgaria/764642-labour-exploitation-victims-increase-expert>.

¹⁵ *Bulgaria*, ECPAT INTERNATIONAL, <https://ecpat.org/country/bulgaria/> (last visited Apr. 3, 2025).

¹⁶ *Legal and Social Aspects of the Sex Industry in Bulgaria*, BULGARIA RELOCATION (Aug. 23, 2024), <https://bulgariarelocation.org/articles/legal-and-social-aspects-of-the-sex-industry-in-bulgaria>.

¹⁷ Grégoire Théry, *Prostitution is not a “work” but a cruel form of exploitation and discrimination*, ANTI-DISCRIMINATION CENTRE (Mar. 7, 2019), <https://adcmemorial.org/en/news/15795/>.

¹⁸ Petrova, *supra* note 14.

¹⁹ *Id.*

²⁰ *Bulgaria*, *supra* note 15.

²¹ Petrova, *supra* note 14.

²² Svetoslava Ingilizova, *"Border Police" intercepted a channel for migrant trafficking*, AKMU (Jan. 21, 2025, 1:36 PM), https://fakti.bg/en/krimi/943363-granichna-policia-preseche-kanal-za-trafik-na-migranti#google_vignette.

²³ *Id.*

12. On January 20, 2025, the Bureau of Immigration prevented the departure of three trafficking victims who were forced to pose as officemates.²⁴ They were to work in Bulgaria without the required documents.²⁵ Their trafficker pretended to be their employer and told them that they would not need to pay for their trip. In effect, this made them indebted to their trafficker.²⁶

13. In March 2024, authorities in Bulgaria and Italy worked together to arrest twenty-two members of a primarily Bulgarian organized crime group (OCG).²⁷ Members of the OCG targeted poor women in Bulgaria and promised these women good jobs in Italy.²⁸ However, once the women arrived in Italy, their passports were taken from them, and they were forced into prostitution.²⁹

14. In 2024, three individuals were arrested for trafficking a Bulgarian woman to Greece to be exploited for forced labor.³⁰ The individuals promised the woman a good job and income, but once she arrived in Greece, her personal documents were taken from her, and she was forced to work as a maid without pay.³¹

15. On April 26, 2023, nine individuals, who were believed to have trafficked young women to the United Kingdom, were arrested.³² They allegedly lured their victims to the United Kingdom via social media by attempting to romantically seduce their victims, a tactic known as the “*Loverboy*” method.³³ Once the girls arrived in the United Kingdom, the traffickers advertised them on adult services websites and used violence to force them to be sexually exploited.³⁴ As a result of those individuals being arrested, five victims were rescued.³⁵

16. In 2022, two Bulgarian men, were sentenced to four and a half years and fifteen months, respectively, in jail for trafficking four Bulgarian women and forcing them to work as prostitutes in Amsterdam’s Red Light District.³⁶ The traffickers isolated the women and forced

²⁴ *BI: 3 Trafficking Victims Made to Pose as Officemates*, GMA NEWS ONLINE (Jan. 21, 2025, 7:16 PM), <https://www.gmanetwork.com/news/topstories/nation/933633/bi-3-trafficking-victims-made-to-pose-as-officemates/story/>.

²⁵ *Id.*

²⁶ *Id.*

²⁷ *Assisting Italian and Bulgarian Authorities: Eurojust Aids in Arresting 22 Suspects Involved in Forcing Female Victims into Prostitution*, DIPLOMAT MAGAZINE (Mar. 15, 2024), <https://diplomatomagazine.eu/2024/03/15/assisting-italian-and-bulgarian-authorities-eurojust-aids-in-arresting-22-suspects-involved-in-forcing-female-victims-into-prostitution/>.

²⁸ *Id.*

²⁹ *Id.*

³⁰ Maria Atanasova, *Three Greeks Have Been Arrested for the Kidnapping of Bulgarian Woman. She Was Forced to Marry One of the Kidnappers*, AKMU (Mar. 4, 2024, 2:00 PM), <https://fakti.bg/en/world/878119-three-greeks-have-been-arrested-for-the-kidnapping-of-a-bulgarian-woman-she-was-forced-to-marry-one-of-the-kidnappers>.

³¹ *Id.*

³² *9 Arrested in Crackdown on Loverboy Trafficking in Bulgaria and UK*, EUROPOL, <https://www.europol.europa.eu/media-press/newsroom/news/9-arrested-in-crackdown-loverboy-trafficking-in-bulgaria-and-uk> (last visited Apr. 3, 2025).

³³ *Id.*

³⁴ *Id.*

³⁵ Vinicius Madureira, *Europe Cracks Down on Sex Trafficking, 15 Arrested*, ORGANIZED CRIME AND CORRUPTION REPORTING PROJECT (Apr. 28, 2023), <https://www.occrp.org/en/news/europe-cracks-down-on-sex-trafficking-15-arrested>.

³⁶ *Court sentences Bulgarians for forcing girls into prostitution*, DUTCH NEWS (Nov. 29, 2022), <https://www.dutchnews.nl/2022/11/court-sentences-bulgarians-for-forcing-girls-into-prostitution/>.

them to work long hours with no control over the money they earned.³⁷ Although the women said that they worked voluntarily, the Public Prosecution Service believed that the women feared the suspects on whom they were very dependent.³⁸

17. These examples highlight the conditions that human trafficking victims are subjected to. Unfortunately, many victims continue to live in these conditions given the high number of victims estimated to be trafficked every year and the low number of victims that are rescued. Bulgaria's failure to adequately combat human trafficking was noted by the European Commission (EC).³⁹ In 2025, the EC announced that it was initiating infringement proceedings against Bulgaria for its failure to implement rules regarding the exchange of law enforcement data which is critical for preventing and investigating human trafficking.⁴⁰

18. Since its last UPR, Bulgaria has taken a positive step to combat human trafficking. For example, it has increased the budget for the National Commission for Combatting Trafficking in Human Beings by 194%.⁴¹ This Commission is responsible for implementing the national policy regarding human trafficking.⁴² Its mission is to prevent human trafficking and assist victims in reintegrating with society. This is a critical step to ensuring that perpetrators are brought to justice and victims get the help they need. Hopefully this will allow the government to invest more in support services for victims, which has decreased in Bulgaria in recent years.⁴³ Additionally, this will allow Bulgaria to follow through with its responsibility under the Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime not only to "prevent and combat trafficking in persons" but also to "protect victims of trafficking in persons, especially women and children, from revictimization."⁴⁴

Recommendations

19. Bulgaria is not upholding its responsibility to prevent human trafficking and protect victims. When 10,000 victims are being trafficked out of the country every year, the few arrests and rescues highlighted above don't even scratch the surface. The government has funded its National Commission for Combatting Trafficking in Human Beings, and it is imperative that this commission uses the resources to aggressively investigate cases of human trafficking and provide aid for the victims.

³⁷ *Amsterdam human trafficking, forced prostitution suspects in court*, NL TIMES (Oct. 9, 2022, 2:20 PM), <https://nltimes.nl/2022/10/09/amsterdam-human-trafficking-forced-prostitution-suspects-court>.

³⁸ *Id.*

³⁹ *European Commission Takes Action Against Bulgaria for Non-Compliance with EU Regulations*, NOVINITE (Jan. 31, 2025, 3:04 PM), <https://www.novinite.com/articles/230623/European+Commission+Takes+Action+Against+Bulgaria+for+Non-Compliance+with+EU+Regulations>.

⁴⁰ *Id.*

⁴¹ *The Budget of the National Commission for Combating Trafficking in Human Beings Will be Increased by 194%*, BNR (Jan. 26, 2024, 1:34 PM), <https://bnr.bg/en/post/101940475/the-budget-of-the-national-commission-for-combating-trafficking-in-human-beings-will-be-increased-by-194>.

⁴² *About*, REPUBLIC OF BULGARIA, <https://antitraffic.government.bg/en/about> (last visited Apr. 3, 2025).

⁴³ *Bulgaria*, GLOBAL ORGANIZED CRIME INDEX, <https://ocindex.net/country/bulgaria> (last visited Apr. 3, 2025).

⁴⁴ Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing Against Transnational Organized Crime, *supra* note 11, art. 9 § 1.