

SECRETARIAT / SECRÉTARIAT

SECRETARIAT OF THE COMMITTEE OF MINISTERS
SECRÉTARIAT DU COMITÉ DES MINISTRES

COMMITTEE
OF MINISTERS
COMITÉ
DES MINISTRES



Contact: *Ireneusz Kondak*
Tel: 03.90.21.59.86

Date: 18/03/2026

DH-DD(2026)363

Documents distributed at the request of a Representative shall be under the sole responsibility of the said Representative, without prejudice to the legal or political position of the Committee of Ministers.

Meeting: 1563rd meeting (June 2026) (DH)

Item reference: Action Report (06/03/2026)

Communication from Romania concerning the case of Buliga v. Romania (Application No. 22003/12)
[Negulescu group]

* * * * *

Les documents distribués à la demande d'un/e Représentant/e le sont sous la seule responsabilité dudit/de ladite Représentant/e, sans préjuger de la position juridique ou politique du Comité des Ministres.

Réunion : 1563^e réunion (juin 2026) (DH)

Référence du point : Bilan d'action (06/03/2026)

Communication de la Roumanie concernant l'affaire Buliga c. Roumanie (requête n° 22003/12) [Negulescu groupe] (**anglais uniquement**)

L/ 1128 / 6 March 2026
5225 R/AG/46



Action Report

No.	Application No.	Case	Judgement of	Final on
1.	22003/12	Buliga	16/02/2021	31/05/2021

I. Case description

The case concerns the unfairness of criminal proceedings concerning the applicant's conviction for minor offences by a court based on decisive evidence from absent witnesses. The Court highlighted that the general guarantees of Art 6 were applicable to all criminal proceedings irrespective of the offence and that the inability of the domestic court to hear witnesses was not a good reason for their non-attendance. The Court also established that there were not sufficient counterbalancing factors to compensate for the handicap created for the defense.

The European Court found that there has been a violation of Article 6(1) of the Convention in respect of the overall fairness of the proceedings.

II. Individual measures

a. Just satisfaction

The authorities have paid the sums awarded by the Court (4,000 EUR in respect of non-pecuniary damage) and proof of payment has been sent to the Department of Execution.

b. Reopening of the proceedings

The applicant has requested the reopening of the proceedings on the 22nd of May 2022 (file 1126/220/2022 of the Deta County Court).

The trial has followed its complete course and by the Decision no 218 of 14 March 2023 of the Preliminary Chamber Judge from the Deta County Court, his request was allowed and the Prosecutor's Order of 9th June 2011 was quashed, changing the legal solution and finding that the statute of limitation for the criminal responsibility had been reached. **Consequently, at the present moment, the applicant no longer suffers any legal consequence due to the facts of the case.**

III. General measures

The general measure required for the execution of *Buliga v. Romania* case have been implemented and examined in the *Negulescu v. Romania* leading case (app. no. 11230/12), in which a final resolution was adopted on 7 October 2025.

3) *Conclusions*

To conclude, the Government kindly ask the Committee of Ministers to acknowledge that the individual and general measures taken by Romanian authorities complied with its obligation under Article 46, paragraph 1 of the Convention. Accordingly, no further measures are required in this case.