



## 4.4. BG - Bulgaria<sup>116</sup>

### 4.4.1. Key findings

- The language of the statute creates a model of progressive realisation of reasonable accommodation, considering the technological abilities and economic situation of the media service providers.
- Stronger obligations are placed on the public service broadcaster (BNT).
- Individual action plans are not publicly available, but they are compiled by the national media regulatory authority (Council for Electronic Media – CEM) in a report released to the public.
- The main focus appears to be on increasing access to news and current affairs programmes, with subtitling and sign language being the primary means.
- Audio description, while mentioned in the statute, does not appear in the examples. There are no other examples of audiovisual media content being made accessible for persons with visual impairment.
- Private media service providers lag significantly behind in the provision of accessible content.
- BNT broadcasts a weekly show specifically for persons with hearing impairments and the D/deaf community called “The World of Gestures”, as well as a “Listen to the News” segment on its website based on an electronic reader that converts written text into audio.
- Radio providers are also required to make content accessible via apps, the Internet, or other technical measures.

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<sup>116</sup> It was not possible to receive feedback on the summary concerning Bulgaria during the checking round with the national competent institutions.



## 4.4.2. Legal framework: primary and secondary legislation

National legislation	Details
<b>Article 7(1) AVMSD</b>	
Radio and television Act Article 8a (1), (primary legislation) (ЗАКОН ЗА РАДИОТО И ТЕЛЕВИЗИЯТА) <sup>117</sup>	Media service providers are obliged to make their content progressively more accessible for persons with visual or hearing impairment. This includes, but is not limited to sign language, subtitling, spoken subtitles, and audio description.
People with disabilities Act Article 64 (primary legislation) (ЗАКОН ЗА ХОРАТА С УВРЕЖДАНИЯ) <sup>118</sup>	Taking into account technological developments and economic resources, BNT services must provide news and current affairs programming with subtitles. According to the action plans submitted to the CEM, BNT services must aim to subtitle all programming with content like news, current affairs, films, series and other such programming. The non-linear services of BNT are included in these obligations.  Terrestrial broadcasting with multi-subject or news programmes and a daily audience share of >20% will provide sign language interpretation for at least one newscast between 7 p.m. and 11.30 p.m.
<b>Article 7 (2) AVMSD</b>	
Radio and television Act Article 8a (2) (primary legislation)  Regulation for the organisation and activity of the Electronic Media Council and its administration  Article 9(1), 26 (secondary legislation) <sup>119</sup>	Reports on the progress made in implementing media service provider action plans must be submitted annually to the Electronic Media Council.
<b>Article 7 (3) AVMSD</b>	
Radio and television Act Article 8a (2)	Action plans must be created and submitted to the CEM every three years.
<b>Article 7 (4) AVMSD</b>	
Radio and television Act Article 8a (6)	The CEM will provide on its website current contact details for an employee tasked with providing information and serving as a contact point for complaints regarding accessibility.
<b>Article 7 (5) AVMSD</b>	

<sup>117</sup> [https://www.cem.bg/files/1651646128\\_zrt\\_eng.pdf](https://www.cem.bg/files/1651646128_zrt_eng.pdf)

<sup>118</sup> <https://lex.bg/bg/laws/ldoc/2137189213>

<sup>119</sup> In Bulgarian: "П Р А В И Л Н И К ЗА УСТРОЙСТВОТО И ДЕЙНОСТТА НА СЪВЕТА ЗА ЕЛЕКТРОННИ МЕДИИ И АДМИНИСТРАЦИЯТА КЪМ НЕГО", [https://www.cem.bg/files/1677139479\\_ustrojstven\\_pravilnik-izm\\_2022.pdf](https://www.cem.bg/files/1677139479_ustrojstven_pravilnik-izm_2022.pdf)



Radio and television Act Article 8a (3)	Media service providers will ensure that emergency information made available to the public through audiovisual media services is made available in a manner accessible for persons with disabilities.  If it is not possible to make this information accessible, that should not prevent its release.
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### 4.4.3. Overview of national measures

Types of accessibility measures	Brief overview of existing rules
Accessibility measures (hearing impairments)	Yes. Subtitling: BNT services – must aim to progressively achieve 100% subtitling of news, current affairs, films, series and other programming content. Sign Language: Terrestrial broadcasting with multi-subject or news programmes and a daily audience share of >20% will provide sign language interpretation for at least one newscast between 7 p.m. and 11.30 p.m.
Accessibility measures (visual impairments)	None detailed – mentioned in the statute, but no evidence of adoption.
Accessibility measures developed by self- or co-regulatory process	Yes – action plans developed by media service providers every three years and submitted to the NRA setting out how they plan to progressively increase the percentage of accessible content.
Reporting to the NRA – frequency	Yes – media service providers must submit action plans every three years, and report on progress every year to the Electronic Media Council.
Designated point of contact for information and complaint	Yes, the Electronic Media Council provides contact information for a designated person who provides information and receives complaints.



## 4.4.4. Law in practice: selected examples

### 4.4.4.1. Public service media service provider:<sup>120</sup> BNT1

Volume of content with subtitles <sup>121</sup>	283 min/day – 2.0%
Volume of content with sign language interpretation	869 min/day – 6.0%
Volume of content with crawl/captions	2 288 min/day – 15.9%

According to BNT's three-year accessibility plan, in 2022, the public provider must provide 1 035 hours (62 100 minutes over 365 days) of content accessible to persons with disabilities (total for the media services BNT1, BNT2 and BNT4; excluding BNT3, which is a sports programme). Separately, BNT plans a film programme on an annual basis: 270 hours of feature films, 130 hours of series, 150 hours of documentaries and series (550 hours or 33 000 minutes over 365 days).

In total, BNT is obliged to broadcast 1 585 hours over 365 days of accessible content for people with sensory disabilities on an annual basis for the three media services (BNT1, BNT2, BNT4).

### 4.4.4.2. Private media service provider: bTV

Volume of content with subtitles	0 minutes – 0%
Volume of content with sign language interpretation	482 min/day – 3.34%
Volume of content with crawl	629 min/day – 4.36%

The central news broadcast at 7 p.m., along with sports and weather, are the only programmes on bTV accompanied by sign language translation. The remaining news broadcasts and shows are without crawl, subtitles, and/or sign language translation.

According to the three-year accessibility plan provided by the Association of Bulgarian Broadcasters to the CEM, the provider bTV Media Group EAD committed to 440 hours (26 400 minutes over 365 days) of content being accessible to persons with disabilities for 2022 (total for all media services – programmes bTV, bTV ACTION, bTV CINEMA, bTV COMEDY and bTV LADY without RING). a total of 1 111 minutes of accessible programming have been observed on BTV channels over a period of 10 days (with sign language and crawl) or an average of 111 minutes per day of accessibility for persons with hearing disabilities.

<sup>120</sup> As reported by the national expert – data drawn from [the annual report of the Council for Electronic Media pp. 91-97: https://www.cem.bg/files/1680258993\\_otchet\\_2022\\_31032023.pdf](https://www.cem.bg/files/1680258993_otchet_2022_31032023.pdf)

<sup>121</sup> BNT1 programme observed for 10 days.