

**EUROPEAN COMMITTEE OF SOCIAL RIGHTS
COMITÉ EUROPÉEN DES DROITS SOCIAUX**

25 April 2023

Case Document No. 2

Eurochild v. Bulgaria
Complaint No. 221/2023

**OBSERVATIONS BY THE GOVERNMENT
ON ADMISSIBILITY**

Registered at the Secretariat on 12 April 2023



PERMANENT REPRESENTATION OF THE REPUBLIC OF BULGARIA
TO THE COUNCIL OF EUROPE

Strasbourg, 12th April 2023

Nr. PV-7.8.3-47

Dear Mr. Kristensen,

In response to your letter Ref. 51/2023LV/IU from 2nd March 2023, please, find attached the position of the Government of the Republic of Bulgaria regarding the admissibility of collective complaint № 221/2023 by the Eurochild against Bulgaria dated 14th February 2023.

Please, accept, Mr. Kristensen, the assurances of my highest consideration.

Enc. 1 file (1 page)

Sincerely,

Maria Spassova
Ambassador, Permanent Representative

Mr. Henrik Kristensen

**Deputy Head of Department,
Deputy Executive Secretary
Of the European Committee of Social Rights
Council of Europe
Strasbourg**

**Position regarding the admissibility of collective complaint № 221/2023 from the
Eurochild v. Bulgaria of February 14, 2023**

1. Eurochild was established in 2004 by a group of organisations formerly working together in the European branch of the International Forum for Child Welfare. The organisation works closely with the European Union, as protecting children's rights is among the EU's aims and values. Eurochild is included on the list of international non-governmental organizations entitled to file collective complaints before the European Committee of Social Rights (Committee).

2. The action is brought against a country – Bulgaria, to which the Charter applies and which has accepted the system of collective complaints. On 29 March 2000, the National Assembly of the Republic of Bulgaria passed the act ratifying the ESCh (rev.) which was promulgated in State Gazette, No. 30/11 April 2000. With the same act, on 7 June 2000 Bulgaria ratified the Additional Protocol of 9 November 1995, effective 1 August 2000, which enables bringing collective complaints.

3. The action concerns provisions of the ESCh (rev.):

- Article 11 – that guarantees the right of protection of health;
- Article 13 – the right to social and medical assistance;
- Article 14 – the right to benefit from social welfare services;
- Article 17 – the right of children and young persons to social, legal and economic protection;
- Article 27 – the right of workers with family responsibilities to equal opportunities and equal treatment;
- Article 30 – the right to protection against poverty and social exclusion.

4. In regard to the admissibility of collective complaint, we would like to inform you that we have no notes. We leave the assessment of the admissibility of collective complaint to the Committee's discretion.