



**EUROPEAN COMMITTEE OF SOCIAL RIGHTS
COMITE EUROPEEN DES DROITS SOCIAUX**

8 April 2024

Case Document No. 4

Eurochild v. Bulgaria
Complaint No. 221/2023

RESPONSE FROM EUROCHILD TO THE GOVERNMENT'S SUBMISSIONS ON THE MERITS

Registered at the Secretariat on 14 March 2024

TO:
MS AOIFE NOLAN
PRESIDENT OF THE EUROPEAN COMMITTEE OF SOCIAL RIGHTS

DIRECTORATE OF SOCIAL RIGHTS, HEALTH AND ENVIRONMENT
DEPARTMENT OF SOCIAL RIGHTS
COINCIL OF EUROPE

Eurochild v. Bulgaria
Complaint No. 221/2023
RESPONSE TO WRITTEN SUBMISSIONS

HONORABLE MADAM PRESIDENT OF THE EUROPEAN COMMITTEE OF SOCIAL RIGHTS OF THE COUNCIL OF EUROPE (“ECSR”), HONORABLE MEMBERS OF THE COMMITTEE,

Kindly find below the official Response of Eurochild to the Written Submissions of the Government of Bulgaria on the merits of Complaint No. 221/2023, which we are lodging pursuant to Article 7 of the Additional Protocol to the European Social Charter providing for a system of collective complaints and Rule 31§2 of the Rules of the ECSR.

14th March, 2024

Kind regards:
Marie-Louise Coleiro Preca,
President Eurochild

Eurochild v. Bulgaria

Complaint No. 221/2023

RESPONSE TO WRITTEN SUBMISSIONS OF THE GOVERNMENT

I. Violation of Article 16 read alone and of Article E taken in conjunction with said provision of the Charter

Eurochild has opted for utilizing in full the total time period rendered by the Committee for lodging the present response, so as for our remarks to encompass the normative and institutional situation of early childhood education and care, and support for parents and families in Bulgaria **as of 15th March, 2024.**

Whilst taking into account the arguments presented by the Government of Bulgaria (“the Government”) within the Written Submissions filed under the proceedings, along with the legal, policy and factual situation of the system of early childhood education and care (“ECEC”) and the available state support for parents as of March 15, 2024, Eurochild holds that Bulgaria has not ensured the satisfactory application of Article 16 of the revised European Social Charter (“the Charter”) read alone, as well as of Article E read in conjunction with said provision of the Charter.

By virtue of Article 16 of the Charter, child-care services, particularly for infants, must exist in quantities and qualities sufficient to adequately meet families’ needs; they ought to offer a high standard of service **(ratio of staff to children, staff training, suitable premises, etc).** States Parties are required to ensure that childcare facilities are available, affordable and of good quality **(coverage with respect to the number of children aged 0-6, ratio of staff to children, staff training, suitable premises and cost of childcare to parents, etc.).**¹ **Creches and day nurseries or similar facilities, as well as family planning information must be available in rural areas.**² States Parties should provide *inter alia* **family counselling and psychological guidance advice on childrearing.**³ The above provisions and case law clarifications are binding on the State of Bulgaria which, despite the recent adoption of several framework documents and policies, exhaustively

¹ Conclusions of the ECSR, 2019, [Azerbaijan](#), Digest of the Case Law of the European Committee of Social Rights, p. 144, Council of Europe, June 2022.

² Conclusions XIII-3 of the ECSR, 1995, [Turkey](#), Digest of the Case Law of the European Committee of Social Rights, p. 144, Council of Europe, June 2022.

³ Conclusions of the ECSR, 2011, [Turkey](#), Digest of the Case Law of the European Committee of Social Rights, p. 145, Council of Europe, June 2022.

listed within the Government's Written Submissions, has failed to implement reforms and relevant measures timely and effectively, and is liable for Charter breaches as a result thereof.

The present conclusions of violation of the Charter are based on the legal and factual grounds systematized hereinbelow, namely:

II. Legal and factual observations

- i. Lack of interconnectedness and efficiency of the adopted framework documents listed in the Government's Written Submissions. Lack of any working mechanism for planning services at the local level. No implemented National Quality Framework (NQF) in ECEC. No National Strategy for the Child (2019 - 2024)**

The legal framework of Bulgaria does not contain a special legal act that guarantees the individual entitlement to full-time early childhood education and care for children who are not of compulsory preschool education age.⁴ Legal provisions that tackle the subject of access to ECEC (if any) are scattered between certain isolated articles from the Preschool and School Education Act (effective as of 1st August 2016), the Health Act and the Social Services Act. The rest of the applicable national law also does not elaborate on the specific measures of the State adopted to ensure that all small children have full access to early child educational facilities designed to meet their needs. This conclusion is further confirmed by the position taken by the Government, which on page 4-5 from its Written Observations indicates that an Interdepartmental Working Group **for planning and coordination** of policies for early childhood development has been established at the Ministry of Education and Science **only in October 2023** (app. 1 year after the initiation of the current proceedings). This is coupled with the admission on behalf of the State on that same page 4 that a National Quality Framework for Early Education and Care (NQF) is **in the process of development** by the Ministry of Education and Science (MoES), for which financial support has been received from the European Commission's Structural Support and Reform Programme (DG Reforms). These two samples extracted from the Written Submission of the Government, even if considered in isolation, affirm the notion that the level of care available for small children in the country is not ensured and needs urgent transformation. Such conclusion is further **tacitly supported by the fact that the EU has extended its financial support precisely for development of the NQF – a clear signal of the severity of the problem concretely in the area of application of Article 16 of the Charter.**

The positive developments in drafting framework documents and constituting working groups regarding ECEC, highlighted in the Government's Submissions, cannot compensate for the majority of the severe challenges of the ECEC system of Bulgaria and the State's support for families. ECEC policies in 2023 and 2024 continue to be marked by inconsistency, inefficiency, and

⁴ <https://eurochild.org/uploads/2022/01/Eurochild-Child-Guarantee-Report-Bulgaria.pdf>

poor dissemination, **absent intradepartmental family-centered support**, which is contributed to further by the short policy horizon of each government over the past three years (at the time of filing of the current Response, the regular Government has resigned and consultations are being held with the President concerning the prospects for forming a new government). **The proposal for a National Quality Framework in ECEC, which was publicly presented at the end of 2022, remains, as indicated above, of an unclear status.** No progress was made on the implementation of the NQF in 2023, and the Written Submissions of the Government do not offer any specifics whatsoever regarding the content of NQF and any prospect deadline for its actual eventual adoption.

MoES supposedly expects, through funding for a second pilot project from the European Commission, to potentially resume the process further in 2024, yet 2023 remained a missed opportunity for the Ministry to render intra-institutional efforts and unlock other possible sources of support for NQF implementation. Within the Action Plan until 2024 for the Strategic Framework for the Development of Education, Training and Learning in the Republic of Bulgaria (2021 - 2030), approved in March 2023, the establishment of an inter-institutional mechanism for monitoring the quality of pre-primary education in the context of introduction of NQF is listed. **This goal, however, was never realized, and more importantly, it remained outside the scope of the 2024 Annual Plan for Promotion of Early Childhood Development, drawn up 11 months later⁵. Thus, quality monitoring through measurement and evaluation remained a priority for indefinite years to come.** This illustrates the lack of harmonization between the framework documents related to the future reform of ECEC, listed within the Written Submissions.

Further, the Action Plan for 2024 under the Strategic Framework for the Development of Education, Training and Learning did not include any measures aimed at overcoming the deficits described in the analytical report prepared in the development of the NQF proposal for ECEC services, such as the **lack of any working mechanism for planning services at the local level**. At the same time, the Annual Plan for the Promotion of Early Childhood Development, which was finalized in the first weeks of 2024, introduces two parallel concepts of “quality” – a national framework and quality standards – without explaining the dichotomies and parallels between the two.⁶ It should be emphasized that even though framework documents with general commitments are not equivalent to real reform and state help to children and parents, the lack of concreteness and connectivity between these framework new documents is particularly discouraging.

⁵ <https://nmd.bg/en/which-urgent-child-related-policies-were-included-in-the-new-governance-programme-of-bulgaria/>

⁶ The Early Childhood Development Plan is currently not available on the website of the Ministry of Labor and Social Policy or in any other official source, resp. no reference can be made.

This lack of harmonization between national strategic frameworks and indicators is most clearly emphasized by the fact that **for a fifth consecutive calendar year (2019-2024), the Republic of Bulgaria continues, to the detriment of children and parents, to not have an adopted National Strategy for the Child** (a circumstance entirely unaddressed in the Submissions), and resp. not have a National Child Protection Program proposed by the Minister of Labor and Social Policy and the Chairman of the State Agency for Child Protection – which is in violation of Art. 1, paragraph 3 of the Child Protection Act.⁷ The absence of these strategic documents **prevents the State from encouraging and monitoring inter-institutional synchronicity between ECEC, health and social services for parents.**

ii. **The medical model of nursery care continues. The lead expert in nurseries is not an early childhood development expert**

As was the case in 2022, a major challenge in the development of an ECEC reform strategy is to unite nurseries and kindergartens under common principles and standards. After the failed legislative attempt to do so at the end of 2022, the topic was completely absent from the public agenda the following year, and key stakeholders in relation to nurseries were not invited to participate in the Standing Interagency Working Group.⁸ The topic of crèches continued to be present on the agenda of the Standing Interagency Working Group in an indirect way, through **vague objectives such as "strengthening the role of educational policies and practices in ECEC, whilst preserving guarantees of children's health"**. Thus, 2023 saw another missed opportunity for assuaging possible public concerns and bringing all perspectives to the target of reforming the drastically dysfunctional post-socialist system of nursery care. In its Written Statement, **the Government has not indicated any efforts channeled in the direction of attracting and involving qualified experts in early-childhood development in nurseries.** On the contrary, as per the arguments outlined on page 2, the State seems to be satisfied with the available care for infants, as regulated in Ordinance No. 26 from 2008, and has not indicated what the effective measures are that will be undertaken to reform ECD in nurseries. Currently, there is a growing tendency for **only middle-aged or retiring nurses to be employed in creches due to the low-salary policy that prevails in this sector.** This is tacitly acknowledged by the Government with the remark concerning the *"severe demographic situation in the country"*. This ultimately contributes to the lack of capacity for the system to provide adequate care for such children, with all the inherent difficulties for working parents. According to the latest publicly available statistics of the NSI for

⁷ <https://lex.bg/laws/ldoc/2134925825>

⁸ <https://nmd.bg/bez-iznenada-h-hhh-decza-ostavat-izvan-yasla-i-gradina-a-reshenie-ima/>

2022, solely 30 544⁹¹⁰ children are enrolled in nurseries from the 59 440¹¹ children born in 2020 and expected to be part of the nursery system.

In line with the above, Eurochild herein proposes that the Committee invite the Government to present statistical information on the scope of care in nurseries (with a breakdown by regions), number of employed persons, number and average age of nurses, along with **the percentage of those enrolled in daycare or attending an early childhood development service relative to all children in the age group of 0-3. These data shall eloquently illustrate the severity of the issues of application of Article 16 of the Charter and the urgent need for reform of nursery care.**

iii. Issues with coverage in kindergartens in the capital continue. Drastic issues in nursery care throughout the country continue

The complete abolition of fees for municipal and state nurseries and kindergartens in 2022 was an undisputed success for the accessibility of ECEC services for children living at risk of poverty and isolation. However, there remain enormous challenges to increasing coverage in ECEC services, and especially for children up to 3 years old. The results of the "Program for the construction, extension, upgrading and reconstruction of nurseries, kindergartens and schools 2020-2022", which ended in 2023, show that **for this period the projects for only three nurseries were approved, none of them for new construction.** The municipality of Sofia, which for the period of 2021-2023 has absorbed BGN 95 million, both through additional targeted subsidies from the central budget and from its own funds, **directed solely 18% of the projects to nurseries.**¹²

As the State describes in the Action Plan for the implementation of the National Development Program BULGARIA 2030 for the period 2024 - 2026 prepared in December 2023,¹³ in two of the

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<https://www.nsi.bg/bg/content/3346/%D0%BE%D0%B1%D1%81%D0%BB%D1%83%D0%B6%D0%B5%D0%BD%D0%B8-%D0%B4%D0%B5%D1%86%D0%B0-%D0%B2-%D0%B4%D0%B5%D1%82%D1%81%D0%BA%D0%B8%D1%82%D0%B5-%D1%8F%D1%81%D0%BB%D0%B8-%D0%BF%D0%BE-%D0%B2%D1%8A%D0%B7%D1%80%D0%B0%D1%81%D1%82%D0%BE%D0%B2%D0%B8-%D0%B3%D1%80%D1%83%D0%BF%D0%B8-%D0%B8-%D1%81%D1%82%D0%B0%D1%82%D0%B8%D1%81%D1%82%D0%B8%D1%87%D0%B5%D1%81%D0%BA%D0%B8-%D1%80%D0%B0%D0%B9%D0%BE%D0%BD%D0%B8>

¹⁰ https://infostat.nsi.bg/infostat/pages/reports/result.jsf?x_2=1521

¹¹ https://www.nsi.bg/sites/default/files/files/data/timeseries/Pop_1.1.1._birth_DR.xls

¹² <https://www.minfin.bg/bg/news/2023-10-13>

¹³ <https://www.minfin.bg/bg/documents?cat=-1&vid=-1&arh=1&dq=%D0%BF%D0%BB%D0%B0%D0%BD>

monitoring indicators, namely net ratio of children from 3 years to entering first grade included in organized groups for early childhood development, %; and share of covered children aged 7 in school education compared to the total number of children in 7 years of age, %, **“deterioration of coverage is observed”**. The Plan continues (p. 21) with the following conclusion: *“This necessitates a thorough analysis of the causes of the mentioned problems in order to take adequate measures to overcome them.”*

Despite national law guaranteeing free pre-primary education, a chronic shortage of ECEC places is particularly evident in big cities, including the capital, and in rural areas.¹⁴ **In 2023, nearly 10,000 children were left without access to nurseries and kindergartens in the capital, where 21% or every fifth child aged 1 to 4 in Bulgaria resides.** There are 98 places available for every 100 children in childcare facilities. **Consequently, around 10,000 children have remained and are expected to remain outside the enrollment system in recent years.**¹⁵ The Government seemingly takes pride in its Written Submissions that currently, through the funding obtained under the National Recovery and Sustainability Plan, 8 kindergartens are in the process of being constructed in the country. It is further submitted by the State that all of them shall be built in Sofia, where, as already elaborated, there is a scarcity of app. 10 000 places for small children. However, even if the 8 kindergartens were to be constructed timely, the latter’s capacity **would not be sufficient to administer more than a total of 2000 children**, and as such cannot be deemed to represent a measure sufficient to tackle the problem.

The problem is not limited to the capital alone. There are huge regional disparities in the provisions of ECEC services, of social services for parents as per the Social Services Act, of support measures of the social assistance system. **Over 16,000 children in Bulgaria live in villages without kindergartens, making it precarious for them to access any ECEC services whatsoever.** As noted hereinabove, the ECSR has expressly stated that creches and day nurseries or similar facilities, as well as family planning information must be available in rural areas.¹⁶ For these children, usually 11 per village, the current plans to simplify the regulatory requirements for the physical environment in kindergartens will not be of much help. **There is a lack of a nationally accepted**

¹⁴ <https://www.unicef.org/bulgaria/media/9126/file>

¹⁵ <https://nmd.bg/en/not-surprisingly-9879-children-remain-without-access-to-nurseries-and-kindergartens-and-there-is-a-solution/#:~:text=Education%20News-,Not%20surprisingly%2C%209%2C879%20children%20remain%20without%20access%20to%20nurseries%20and,And%20there%20is%20a%20solution.&text=Again%2C%20nearly%2010%2C000%20children%20in,to%204%20in%20Bulgaria%20resides.>

¹⁶ Conclusions XIII-3 of the ECSR, 1995, [Turkey](#), Digest of the Case Law of the European Committee of Social Rights, p. 144, Council of Europe, June 2022.

mechanism for long-term planning by municipalities of the needs for ECEC services.¹⁷ As highlighted by the National Network for Children in Bulgaria, the extreme shortage of places in nurseries and kindergartens **completely shifts the conversation away from the quality of care** provided in these institutions. According to Eurostat data from 2021, 71.7% of children in Bulgaria are cared for by their parents at home until the age of 3.¹⁸ According to data from the National Statistical Institute (NSI),¹⁹ **the proportion of children aged 3 and below enrolled in ECEC services in Bulgaria was 17.9% in 2022.** This percentage is much lower than the EU's target of 45% and has remained relatively stable for the past five years nationwide, **reaching a mere 23.1% in municipalities with the highest coverage, such as Gabrovo, whilst it is merely 8.5-9% in the cities of Sliven and Pazardzhik.**

The possible compensations to be paid by the State in no way address the need for those children to attend professional educational facilities that educate them both academically and socially. At the same time, Eurochild hereby reiterates that the text of the Ordinance is discriminatory as it *de facto* **does not allow compensations to be paid to children, having been born in the second part of the calendar year (another circumstance not addressed in the Written Submissions).** The unreasonably narrow scope of the Ordinance effectively further creates unequal treatment for parents of children under the age of 3 who are practically deprived of any type of care for their children.

In the short and long term the provision of quality ECEC has a clear, positive impact on success in education, in the labor market, coping with poverty and social exclusion.²⁰ The lack of scope and quality of ECEC services inevitably directly results in deficits that are subsequently reported by the school education system. For reference, the PISA results of Bulgaria for 2022 show an utterly low result by Bulgarian students, laying bare the systemic problems in the educational system of Bulgaria. 54% of 15-year-old children in Bulgaria are below the critical knowledge and skills minimum in mathematics, 53% do not have basic reading skills, and 48% have serious deficiencies in natural sciences. Bulgarian students scored **results that were lower than the average for the 80 countries** included in the assessment, they were also down compared to 2018. The decline in the results by the 15-year-old children has been a durable trend since 2015.²¹

¹⁷ <https://data-for-good.bg/posts/2023-12-07-access-to-early-learning/>

¹⁸ <https://nmd.bg/en/not-surprisingly-9879-children-remain-without-access-to-nurseries-and-kindergartens-and-there-is-a-solution/>

¹⁹ https://infostat.nsi.bg/infostat/pages/reports/result.jsf?x_2=1521

²⁰ Heckman et al. 2010; Karoly et al. 2011; Barnett and Masse 2007; Reynolds et al. 2011; van Belle, 2011.

²¹ <https://www.oecd.org/publication/pisa-2022-results/country-notes/bulgaria-29d65f4b/>

iv. The State refuses to recognize and support alternative forms of care (parental cooperatives, children's centers, *et alia*)

The share of funds for the construction and repair of kindergartens and nurseries for 2024-2026 is ten percentage points lower than the target share for 2020-2022. Such decisions make it difficult to understand the state policy, if any, to achieve the Barcelona targets for coverage in ECEC services for children up to the age of 3. **The revised Barcelona target is 45%,²² whilst the coverage in Bulgaria is 18%, and the provision of places in nurseries in the country does not exceed 30% anywhere in the country, as per official NSI data.²³** Kindergartens are also not included in training for principals in leadership skills provided for under the National Program Qualification of Pedagogical Specialists. Also, in order to achieve equal treatment of kindergartens and schools in the recent changes in the Ordinance on the financing of institutions in the system of preschool and school education, an explicit coordinated effort of the civil sector was necessary.

In 2024, the Government is in no way supporting any type of private initiatives that parents organize in order to fill up the existing gaps in ECEC provided by the State. **Not only there are no concrete measures that support such private initiatives and enterprises, but the latter are restricted and practically stopped by authorities adopting a *numerous clausus* application of the law.** Although parents have the right to co-operate as individuals under the Cooperatives Act, **the parental childcare cooperatives are not allowed to provide organized childcare unless the parents formally establish a private kindergarten** as required by the Public Education Act. However, the existing legal requirements for private kindergartens are not applicable to small forms of care for 5-10 children each.²⁴ As stated within Eurochild's Complaint initiating the current proceedings, one of the privately organized parents' cooperatives offering ECEC for children above 2 years was effectively stopped under the pretext that the facility that was being used for the purpose was not designated officially as a day-care center for children. At the same time, the Government is not offering parents alternative means to fill this gap.

v. Severe lack of access to services within Roma and other marginalized communities. Insufficient data on ECEC services and disparities disaggregated by ethnicity

It should be noted that **the issues with scope and access multiply significantly in impoverished and stigmatized communities across the country** – Roma parents, other

²² <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022DC0442>

²³ https://www.nsi.bg/sites/default/files/files/pressreleases/Creches2022_I6KES6M.pdf

²⁴ <https://nmd.bg/roditelskite-kooperativi-smislana-alternativa-izvan-zakona/>

minorities, migrant families, parents and children from Ukraine with granted temporary protection, *et alia*.

As the National Network for Children reports, the problem of access to quality ECEC disproportionately affects various marginalized communities - incl. refugees from Ukraine with temporary protection status. **For instance, conflicting interpretations of the temporary protection provisions on behalf of local social services arise regarding the entitlement of children with temporary protection to school enrollment benefits.**²⁵

As pointed out within the RECI+ report, “Early childhood in Roma communities in Bulgaria”, issued in September 2020 by the Open Society Institute Foundation – Sofia, **insufficient data, including the absence of data disaggregated by ethnicity, continue to be a serious obstacle before measuring the impact and results of policies for ECEC**, health and social services on different groups in Bulgaria.²⁶ They also hinder effective monitoring and response mechanisms. Such data are of utmost importance for performing in-depth analysis and the development of evidence-based policies and programs for improving the situation of Roma communities. There is no structured and regular involvement of Roma communities to ensure that local services are of good quality and tailored to the specific needs and problems of the community, reflecting individual cultural characteristics and empowering Roma families.²⁷

Further, **as of the beginning of 2023, the total number of Bulgarian citizens without an identity card amounted to 207,263, and compared to July 2022, it had grown by 19,380 people.** Of these, the number of people with a current address in Bulgaria was already 110,389, and compared to July 2022, it had grown by 1156 people. This was established by the Bulgarian Helsinki Committee through an inquiry under the Act on Access to Public Information.²⁸ The reason for no issuance of an ID is a refusal by the Ministry of the Interior, as persons with an address at a removed property turn out to have no legally valid permanent address.

III. Conclusions

The coverage in ECEC services for children up to the age of 3 in Bulgaria is 18%, whilst the provision of places in nurseries does not exceed 30% anywhere in the country, as per official National Statistical Institute (NSI) data.²⁹ In 2023, nearly 10,000 children were left without access to nurseries and kindergartens in the capital, where 21% or every fifth child aged 1 to 4

²⁵ https://nmd.bg/wp-content/uploads/2023/06/belejnuk_2023_en_low-res.pdf

²⁶ https://amalipe.bg/wp-content/uploads/2021/03/RECI_Bulgaria-report_BG-2021-01-18-corr4.pdf

²⁷ Ibid.

²⁸ <https://www.bghelsinki.org/bg/news/2023-02-07-press-people-without-id-cards>

²⁹ https://www.nsi.bg/sites/default/files/files/pressreleases/Creches2022_I6KES6M.pdf

in Bulgaria resides. Over 16,000 children in Bulgaria live in villages without kindergartens, making it precarious for them to access any ECEC services whatsoever. There is no working mechanism for planning ECEC services at the local level. 1 in 3 children in Bulgaria lives at risk of poverty and social exclusion (poverty herein implies not solely material deprivation, but also diverse challenges to access basic services). The Bulgarian Government has not indicated any efforts channeled in the direction of reforming the system of nursery care, and of attracting and involving qualified experts in early-childhood development in nurseries. In many cases, ECEC services are partially functional, have little reach or fail to cover the most critical age for early intervention, namely 0 to 3 years. There is no mechanism for monitoring the quality of pre-primary education. There are no uniform standards, rules and procedures, as well as requirements for the qualification and continuing education of specialists working in these services. The lack of a systematic approach to ECEC and early intervention leads to disparate services, where there is no possibility to track the quality and outcomes of these services. As of March 15th, 2024, the Government is in no way legitimizing and / or supporting any type of private initiatives that parents organize in order to fill up the existing gaps in ECEC provided by the State. The Bulgarian social assistance system is suffering from understaffing, high caseloads and high turnover of the staff, whilst the monitoring and quality assurance structures of services remain extremely weak. This plethora of problems concerning the scope and access of the Bulgarian ECEC and state support for parents multiplies significantly in impoverished and stigmatized communities across Bulgaria (i.e. Roma parents, other minorities, migrant families, parents and children from Ukraine with granted temporary protection, *et alia*). In 2023, Bulgarian citizens without an identity card exceed 207,000 people, of whom 110,389 live in deprivation of a number of basic human rights.

Based on the legal and factual grounds systematized hereinabove, as well as within the Complaint initiating the present proceedings, and on the circumstance that no system of concrete solutions and response mechanisms for these problems was defended within the Government's Written Submissions, Eurochild holds that Bulgaria has not ensured the satisfactory application of Article 16 of the revised European Social Charter read alone, as well as of Article E read in conjunction with said provision of the Charter.

14th March, 2024

Kind regards:

Marie-Louise Coleiro Preca
President Eurochild