

Ref: CommHR/MOF/sf 134-2026

Nataliya EFREMOVA

Minister of Labour and Social Policy
Republic of Bulgaria

Strasbourg, 1 October 2026

Dear Minister,

Following our exchange on the housing rights of Roma during my visit to Bulgaria from 29 June to 3 July, I wish to set out some additional observations. I appreciate that the issues raised involve several areas of responsibility and would be grateful if they could be considered, as appropriate, in the work of relevant authorities.

I acknowledge Bulgaria's achievements in poverty reduction, social inclusion, education, and employment, marking steps towards the 2030 EU Roma Strategic Framework targets. However, I am concerned by reports of Roma communities continuing to face marginalisation and discrimination, amid persisting antigypsyism. It is important to intensify efforts to address these challenges, including through further improvements to policies and measures, notably those under the National Strategy for the Equality, Inclusion and Participation of Roma (2021–2030).

The housing situation of Roma communities, especially those in informal settlements, remains worrying. Many are reported to live in conditions at variance with the right to adequate housing, facing insecurity about their homes and lacking access to basic services such as healthcare, education and employment. According to accounts I received, although recent legal changes have made it possible for homeless people and those in informal dwellings to obtain address registration and identity documents, inconsistent implementation by authorities means that many face significant barriers to exercising their rights.

I have expressed my concerns about recurrent evictions and demolitions, such as those in Zaharna Fabrika, Sofia in April 2025 and recently in Lozenets, Stara Zagora. These and similar actions in various municipalities have serious human rights implications which require thorough consideration. While local authorities often cite compliance with health, safety, or zoning regulations as justification, the pursuit of these legitimate aims cannot replace careful and comprehensive proportionality reviews that take into account the individual circumstances of those affected.

As discussed during my visit, I encourage the establishment of a clear framework of safeguards in respect of demolitions and evictions. This should include explicit legal requirements for proportionality assessments, going beyond the general provisions of current administrative law, as well as effective avenues to challenge measures adopted in these cases. The framework should notably aim to prevent homelessness and further harm to those affected, including when they lack formal title to the property. The full implementation of the relevant judgments of the European Court of Human Rights will be essential to remedy outstanding issues concerning the rules and practice in this area. I note that, in its recent judgment in *Aleksieva and Others v. Bulgaria*, building on the guidance provided in the *Yordanova and Others v. Bulgaria* group of cases, the Court indicated that legislative action would be the preferable means to address these issues.

In any event, where evictions or demolitions are inevitable, it is especially important to protect the rights of children and other vulnerable groups. Before any orders are carried out, suitable alternative housing should be identified, with the genuine involvement of those affected. More broadly, sustainable solutions require cooperation between national and local authorities (covering housing, social protection, health and legal assistance), engagement with civil society, assignment of responsibilities, and funding.

Finally, I appreciate the government's work towards a new National Housing Strategy. It would be valuable for this strategy to specifically address the housing situation of Roma communities, including

those in informal settlements. Measures should promote security of tenure, ensure access to essential services, and facilitate obtaining address registration and identity documents. I recommend making effective, non-discriminatory access to social housing and the wider housing market a priority, while allocating appropriate national funding to increase the social housing stock. Drawing on the successful model of Roma mediators in areas such as health, I encourage the expansion of their role in the housing sector.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael O'Flaherty', with a stylized, flowing script.

Michael O'Flaherty