



Committee of the Parties
to the Council of Europe Convention
on Action against Trafficking in Human Beings

Recommendation CP/Rec(2025)09
on the implementation of the Council of Europe Convention
on Action against Trafficking in Human Beings
by Bulgaria

*adopted at the 37th meeting of the Committee of the Parties
on 18 December 2025*

The Committee of the Parties to the Council of Europe Convention on Action against Trafficking in Human Beings (hereinafter referred to as "the Convention"), acting under the terms of Article 38(7) of the Convention;

Having regard to the purposes of the Convention to prevent and combat trafficking in human beings, while guaranteeing gender equality, protect the human rights of victims of trafficking, design a comprehensive framework for the protection and assistance of victims and witnesses, ensure the effective investigation and prosecution of the offences related to trafficking in human beings, and promote international co-operation;

Bearing in mind the provisions of Article 36(1) of the Convention concerning the monitoring role of the Group of Experts on Action against Trafficking in Human Beings (GRETA) in the implementation of the Convention;

Having regard to the Rules of Procedure of the Committee of the Parties;

Having regard to the instrument of ratification deposited by Bulgaria on 17 April 2007;

Having examined the fourth report concerning the implementation of the Convention by Bulgaria, adopted by GRETA at its 54th meeting (30 June - 4 July 2025), as well as the comments of the Bulgarian Government received on 19 September 2025;

Bearing in mind the focus of the fourth evaluation round of the Convention on vulnerabilities to human trafficking and measures taken to prevent them, detect and support vulnerable victims, and punish the offenders, as well as the additional focus on the use of information and communication technology (ICT);

Considering the conclusions and proposals for action contained in Appendix 2 of GRETA's fourth report on Bulgaria related to the thematic focus of the fourth evaluation round and follow-up topics specific to Bulgaria;

Welcoming the measures taken and the progress achieved by Bulgaria in implementing the Convention, and in particular:

- the increase in the budget of the National Commission for Combating Trafficking in Human Beings and the specialised services provided to victims of human trafficking;
- the legislative, policy and practical measures taken to prevent trafficking in children, in particular amongst unaccompanied children and children in Roma communities, including the adoption of the National Programme for the Prevention of Child Violence and Abuse (2023-2026);

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- the measures taken to address the vulnerabilities of Roma to human trafficking and the important work of the Roma mediators;
 - the amendments to the Law on Asylum and Refugees and the Law on Labour Migration and Labour Mobility, which strengthen the prevention of exploitation of asylum seekers, refugees and migrant workers;
 - the issuing of Prosecutor General's instructions in relation to pre-trial proceedings opened for trafficking in human beings and the setting up of a specialised interagency unit to facilitate the investigation of organised crime;
 - the steps taken to tackle technology-facilitated trafficking, including through awareness-raising activities, education and training provided to law enforcement officials;
- A. Recommends that the Government of Bulgaria take measures to address the following issues for urgent action¹ identified in GRETA's report:
1. take further steps to prevent human trafficking of migrant workers, in particular by:
 - increasing the resources of the General Labour Inspectorate to enable it to conduct proactive inspections in all sectors;
 - introducing a legally binding certification of recruitment agencies which act as intermediaries for migrant workers arriving in Bulgaria and ensuring that such workers are provided with contracts and information on their rights in a language that they can understand prior to arrival in Bulgaria (paragraph 101);
 2. further improve the identification of victims of human trafficking, including by:
 - providing systematic training to officials of the State Agency for Refugees, migration officials, border police staff, as well as social workers, medical and other staff working at facilities for asylum seekers and detained migrants, focusing on the proactive identification of victims of trafficking and the procedures to be followed;
 - ensuring that the police, border police and immigration police have access to qualified and trained interpreters by introducing a regulation and remuneration for interpreters in these services;
 - ensuring that pre-removal risk assessments prior to all forced removals from Bulgaria fully assess the risks of trafficking or re-trafficking on return, in compliance with the obligation of non-refoulement. In this context, reference is made to GRETA's Guidance note on the entitlement of victims of trafficking, and persons at risk of being trafficked, to international protection (paragraph 135);
 3. ensure that the assistance measures provided for in the Convention and by Bulgarian law are guaranteed in practice, in particular by:
 - providing adequate funding to ensure the availability, sustainability and quality of the specialised services for victims of human trafficking and to support their long-term social inclusion;
 - ensuring that child victims of human trafficking benefit from specialised accommodation and services across the country, taking into account the best interests of the child;
 - guaranteeing access to health care to all victims of human trafficking;
 - strengthening the capacity to assist male victims of THB, including the provision of residential services for them (paragraph 150);

¹ The number of the paragraph setting out GRETA's proposals in the report is indicated in brackets.

4. introduce the concept of “abuse of a position of vulnerability” in the criminalisation of trafficking in human beings, and provide training and guidance to investigators, prosecutors and judges on how victims’ position of vulnerability may exist or arise and how its abuse may operate in the context of trafficking (paragraph 158);
5. take additional measures to strengthen the criminal justice response to human trafficking, including by:
 - strengthening efforts to investigate, prosecute and convict perpetrators of trafficking for the purpose of labour exploitation and providing guidance on the scope of forced labour, in line with the ILO indicators of forced labour and the case-law of the European Court of Human Rights;
 - ensuring that human trafficking cases are prosecuted as such, rather than as other/lesser offences, every time the circumstances of the case allow this, and lead to effective, proportionate and dissuasive sanctions for those convicted;
 - ensuring that the length of court proceedings in cases of trafficking of human beings is reasonable, in line with the case-law of the European Court of Human Rights (related to Article 6, paragraph 1 of the ECHR) and the standards set by the European Commission for the Efficiency of Justice (CEPEJ) (paragraph 169);
6. allocate appropriate funding from the State budget to action against trafficking in human beings and to ensure its timely availability for the different services provided (paragraph 24);
7. implement without further delay GRETA’s long-lasting recommendation by enshrining in law the recovery and reflection period as provided for in Article 13 of the Convention. Officers performing identification should be issued with clear instructions stressing the obligation to systematically offer the recovery and reflection period to all presumed foreign victims of human trafficking, including EU and EEA citizens, together with all the measures of protection and assistance envisaged in Article 12, paragraphs 1 and 2, of the Convention during this period (paragraph 202);
8. ensure that victims of human trafficking, regardless of their financial means, receive specialised legal assistance and free legal aid at an early stage of the criminal proceedings, and throughout the latter. This should include steps to ensure that:
 - access to free legal aid for victims of human trafficking is unconditional and does not depend on a proof of lack of financial means to pay for a lawyer;
 - adequate funding is made available for the provision of legal assistance and legal representation (paragraph 211);
9. make additional efforts to guarantee access to compensation for victims of human trafficking, in particular by:
 - enabling all victims of trafficking to effectively exercise their right to compensation primarily in the criminal proceedings;
 - ensuring that the Prosecutor’s Office applies in practice Article 51 of the Code of Criminal Procedure and broadening the application of this provision to vulnerable victims;
 - reviewing the procedure and eligibility criteria for claiming compensation from the state and amending the relevant provisions to ensure that state compensation is capable of covering compensation for moral damages and unpaid wages;
 - setting up a victim compensation fund which uses confiscated assets of perpetrators of human trafficking offences to fund compensation;
 - including the topic of compensation in the training programmes for lawyers, prosecutors and judges (paragraph 227);

- B. Bearing in mind GRETA's conclusions that some recommendations made repeatedly in preceding evaluation rounds have not been implemented or have been only partially implemented, requests the Bulgarian authorities to take steps to implement the recommendations in points 3, 7, 8 and 9 as a matter of priority;
- C. Recommends that the Bulgarian authorities take measures to implement the other proposals for action listed in Appendix 2 of GRETA's fourth evaluation report;
- D. Requests the Bulgarian Government to report to the Committee of the Parties on the measures taken to comply with this recommendation by 18 December 2027;
- E. Invites the Bulgarian Government to continue the dialogue in progress with GRETA and to keep GRETA regularly informed of the measures taken in response to GRETA's conclusions.