



REPUBLIC OF BULGARIA

Ministry of Labour and Social Policy

Sofia...⁰⁹...October 2026

DEAR MR. O'FLAHERTY,

We would like to thank you for your letter and for your continued attention to issues concerning housing policy, social inclusion and the protection of vulnerable groups. The Republic of Bulgaria attaches great importance to these matters, recognizing their significance for ensuring adequate living conditions, promoting social cohesion and safeguarding the rights and dignity of all citizens.

As the issues raised in your letter fall within the remit of several institutions, at this stage we are providing information on matters falling within the competence of the Ministry of Regional Development and Public Works and the Ministry of Justice.

The issue of Roma housing rights, that concerns the need for a thorough and comprehensive proportionality assessment that takes into account the individual circumstances of the persons concerned within the relevant proceedings, was discussed objectively.

Indeed, the recent judgment of the European Court of Human Rights (ECtHR) in the case of "Aleksieva and Others v. Bulgaria", identifies a serious systemic problem and prescribes general measures for its execution, emphasising the need for timely legislative amendments. The judgment concerns events related to the demolition, in August 2023, of the Roma neighbourhood "Orlandovtsi" in Sofia, which has existed since the 1950s.

**TO
MR. MICHAEL O'FLAHERTY
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COUNCIL OF EUROPE
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The European Court of Human Rights explicitly places the procedural standing of *the occupant*, who has no property right in the unlawful building, at the centre of the requirements of Article 8 of the European Convention on Human Rights. The judgment obliges Bulgaria to take measures to ensure that persons who have no formal right to occupy the building, but who risk losing their only home because of an impending demolition, will have effective access to a proportionality assessment tailored to their individual needs, even where they are not addressees of the removal order. As in other similar judgments, the Court does not specify the particular legislative mechanism that Bulgaria must adopt. In the interests of effectiveness and clarity, the Court holds that specific legislative amendments would be the preferred approach to remedy the identified gaps and inconsistencies.

We therefore consider it necessary that the available draft legislative amendments be supplemented with the Court's current directions and adopted on an expedited basis, in order to avoid a series of probable similar judgments against the Bulgarian State.

With the amendment to the Civil Registration Act (CRA) in October 2024, the concept of an 'service address' was introduced, at which address the registration of persons who do not possess the documents required by law (regarding ownership or use of the property for residential purposes). The adopted amendments have far-reaching positive implications for the situation of people in vulnerable circumstances, including those affected by the demolition of buildings. The introduction of the service address ensures that all citizens can apply for address registration and obtain an identity document, which is a prerequisite for:

- exercising their rights (voting, entering into an employment contract and/or other contracts);
- receive services (issuance of documents by administrative bodies, social assistance, healthcare, including integrated health and social care services for residential care, etc.).

The transitional provisions of the amendments set out a strict framework for the swift and effective launch of the service registration process. Under the amendments, the mayor of the municipality designates a so-called 'service address', which is the address of a property owned by the municipality, for the purposes of service address registration at a permanent and current address. Citizens registered at a service address may obtain an identity document. For their part, local authorities provide information on the conditions and necessary documents relating to service registration and assist all those in need in accordance with the legislation in force. Information is published on municipal websites regarding the obligations of persons registered at a service address under the Bulgarian Personal Documents Act, and the relevant municipal offices are also notified. Information materials are produced and distributed to the public, with local health mediators also helping to inform citizens. Some municipalities report that, as a result of the changes introduced, there has been an improvement in access to applications for council housing and social services.

As of November 2025, around 50,000 people were registered at a registered address. With regard to the number of identity documents issued following the legislative amendments, from 6 January 2025 (the date the provision came into force) to May 2026, the total number of Bulgarian identity documents issued at a registered address across the country was 3,931.

Furthermore, within the scope of its remit, the Ministry of Labour and Social Policy provides support to people in need regarding the issue of identity cards. Under Article 16a of the Regulations for the Implementation of the Social Assistance Act, individuals may be granted a one-off targeted grant for the issue of an identity card, up to the amount of the basic monthly social assistance allowance, in accordance with the coefficient determined for the individual or the aggregate coefficient for their family.

Housing policy is one of the key responsibilities of the State, as it is a necessary condition for achieving high-quality and balanced socio-economic development and ensuring opportunities for a dignified life for its citizens. The Ministry of Regional Development and Public Works is currently in process of developing a National Housing Strategy. It will constitute a fundamental framework document for the development of the housing sector in Bulgaria, setting out the long-term vision and priorities in the field of housing policy. The Strategy will include a comprehensive set of objectives for the State's housing policy, the instruments necessary to achieve them, as well as a clear allocation of responsibilities among all stakeholders – state institutions, municipalities, the private sector, the non-governmental sector and citizens.

We would like to note that under the Operational Programme “Regions in Growth” 2014–2020, 18 social housing projects have been implemented, with a total value of BGN 49.8 million. As a result, 854 housing units in urban areas have been rehabilitated, and housing conditions have been improved for 1,688 members of marginalized groups, including Roma. Building on this experience, the Programme “Development of the Regions” 2021–2027 is expected to continue supporting interventions related to housing infrastructure and energy efficiency measures.

Under Priority 1, improvements to the energy performance of approximately 2,162 housing units are envisaged, while investments in housing infrastructure are expected to lead to the creation or modernisation of social housing with a capacity to accommodate approximately 709 people. In addition, the Programme is expected to support other social infrastructure contributing to social inclusion in the community, with an indicative capacity of approximately 901 people in newly established or modernised social services. Under the Programme “Development of the Regions” 2021–2027, 4 funding agreements have been concluded to date for the construction and/or renovation of social housing, amounting to EUR 37.5 million.

We would like to inform that a further 13 funding agreements have been concluded for projects related to other social services supporting vulnerable groups, amounting to EUR 111.9 million. The approved projects are expected to provide new or modernised social housing places with a capacity of 470 people, with an estimated 434 users per year. In addition, the projects are expected to increase the capacity of new or modernised social care facilities, other than residential accommodation, to 758 people per year, with an estimated 1,756 users annually.

With regard to the issue of evictions, and in particular the cases involving measures to demolish illegal and unsafe structures in the Zaharna Fabrika neighbourhood under the auspices of Sofia Municipality, a working meeting was initiated and held on 29 April 2025 to identify urgent solutions and a long-term approach to providing accommodation and social support to families left homeless. The meeting was attended by representatives of the relevant state institutions, the non-governmental sector, as well as citizens affected by the measures in the Zaharna Fabrika neighbourhood, Ilinden District, Sofia Municipality. Sofia Municipality has mobilized all available resources to provide social support to the affected families and minors at risk. Agreement has been reached that, through coordinated joint efforts, effective and sustainable measures will be implemented as a matter of urgency in order to achieve a lasting resolution of the problem. As of today, according to information provided by the local authorities, all families from the demolished illegal and unsafe structures in the Zaharna Fabrika neighbourhood who requested alternative accommodation have been accommodated and have shelter.

As regards the case involving measures to demolish illegal and unsafe structures in the Lozenets neighbourhood of Stara Zagora, it should be noted that the actions of Stara Zagora Municipality fully comply with the principles of proportionality, humanity and legality. All individuals have been informed and advised about the available options for social assistance and access to social services, and the majority of them had already been receiving assistance. As of today, according to information provided by the local authorities, all families and individuals from the demolished illegal and unsafe

structures in the Lozenets neighbourhood who requested alternative accommodation have been accommodated and have shelter.

Last but not least it is worth mentioning that data on housing overcrowding among children at risk of poverty also show a clear trend of gradual improvement over the period 2021–2025.

Mr. Commissioner, the Bulgarian State avails itself of this opportunity to reaffirm its commitment to continuing its constructive cooperation with you, and expresses its appreciation for your objective and constructive engagement, which is of particular importance in supporting our efforts to achieve the country's strategic objectives in this field.

Sincerely yours,



NATALIA EFREMOVA
MINISTER