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Monitoring Visit to Bulgaria

Sofia, 27 February - 2 March 2025

Report by the Monitoring Team

(Including the national report and comments by Bulgaria)

Adopted by the T-S4 Committee by written procedure on 20 October 2025

REPORT OF THE MONITORING VISIT TO BULGARIA

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INTRODUCTION

The Council of Europe monitoring visit to Bulgaria was conducted by a team appointed by the Committee of the Saint-Denis Convention (T-S4). The team included experts in safety, security, and service, representing Greece and Türkiye, as well as non-State observers from Football Supporters Europe (FSE) and UEFA. This visit was requested by the Bulgarian Government to seek support in implementing reforms related to safety, security, and service at sports events. Bulgaria ratified the Saint-Denis Convention in 2019, and the Convention entered into force in Bulgaria in 2020.

The visit aimed to assess Bulgaria's legal, regulatory, and institutional frameworks against the Convention's provisions and identify good practices and lessons learned. The team appreciated Bulgaria's efforts to adopt a modern law on safety, security, and service at sports events and to modernise sports infrastructures. The visit included meetings with stakeholders, visits to stadiums, and attendance at a major football match. Seven positive aspects of the visit were highlighted, including the peer-to-peer approach, engagement of executive and legislative powers, broader scope covering football and basketball, and the holding of a joint press conference.

The visit also provided an opportunity for stakeholders to accelerate legislative processes and set up coordination arrangements. The Ministry of Youth and Sports and the Ministry of Interior played key roles in the visit, emphasising transparency, public interest protection, and equal access to sports facilities. Legislative proposals were discussed, including measures to tackle criminality linked to sporting events and the establishment of a National Coordination Committee. The team noted the need for greater clarity regarding local coordination committees and standards for sports facility certification.

The report stresses the importance of supporting Bulgarian authorities in developing and implementing strategies to comply with the Convention and provide a safe, secure, and welcoming environment at sports events. Recommendations include developing a national strategy for stadium infrastructure improvements, improving stadium safety licensing, and ensuring effective training for safety and security personnel. The team expressed gratitude for the cooperation and commitment of all parties involved in the visit.

PART 1 - NATIONAL REPORT OF BULGARIA

NATIONAL REPORT

The Council of Europe Convention on an Integrated Approach to Safety, Security, and Service at Sports Events (in 2016, replacing the 1985 European Convention on Spectator Violence known as the Saint-Denis Convention) was signed in 2016 and represents a modern framework for promoting spectator safety and the good management of sports events. Bulgaria is an active participant in this initiative, having ratified the Convention in 2019.

This report examines key aspects of Bulgaria's participation, measures taken, and ongoing challenges. Bulgaria signed the Saint-Denis Convention and Misbehaviour at Sports Events. The ratification of the Convention is part of the country's commitment to modernising the management of safety, security and service during sports events. The document came into force in Bulgaria, leading to the gradual adaptation of legislation and practices in compliance with international standards.

1 - Measures taken for the implementation of the Saint-Denis Convention

The Convention aims for an integrated approach to safety, security and service at sports events. Bulgaria has undertaken various legislative, organisational, and practical actions aimed at improving the sports environment and preventing incidents. These steps include:

1. Legislative Changes:

- Gradual adaptation of national legislation, including amendments to the Protection of Public Order During Sports Events Act and the Act on Physical Education and Sport.
- Introduction of mandatory measures such as video surveillance, access control, and separation of fans in sports facilities.

2. Organisational Measures:

- Establishment of coordination units among the police, local authorities, and sports organisations.

3. Training and Prevention:

- Specialised training courses for police officers and sports event organisers on crowd management and handling emergencies.
- Campaigns to promote cultural and tolerant behaviour among fans.

4. Infrastructure Investments:

- Renovation and modernisation of sports facilities, including emergency exits, medical stations, emergency lighting, control rooms, fan zones, etc.
- Implementation of modern control and security systems.

5. International Cooperation:

- Exchange of best practices and information with member countries of the Convention.
- Participation in international forums and conferences to share innovations and solutions in the field of sports security.

6. Financial Support:

- Securing funding for infrastructure improvements through national and European funds

These measures allow Bulgaria not only to fulfil the requirements of the Saint Denis Convention, but also to improve the conditions for holding sports events. They also contribute to accident prevention and strengthening the country's international image as a safe sports destination. Law enforcement, sporting event organisers and security firms undergo specialised training in crowd management and emergency response.

Benefits and Results Achieved

Thanks to the ratification of the Saint-Denis Convention and subsequent actions:

- The security of sports events in Bulgaria has significantly improved.
- Numerous training sessions and campaigns promoting best practices have been organised.
- Bulgaria is establishing itself as a reliable partner in international efforts to ensure safety at sports events.

Bulgaria's participation in the Saint-Denis Convention demonstrates the country's commitment to creating a safe and welcoming environment for sports events. Despite certain challenges, the measures already taken are yielding positive results. Continuous improvement of infrastructure and management will ensure sustainable development in this area.

Legislative Updates:**1. Gradual Update of the Law:**

Amendments to the Protection of Public Order During Sports Events Act now require:

- Mandatory video surveillance.
- Designated zones for visiting fans.
- Emergency lighting and sound systems.

2. New Regulations for Medical Stations:

- Every stadium must have an equipped medical station for emergency assistance.

Bulgaria's national legislation related to sports security includes various legal provisions aimed at ensuring a safe and welcoming environment for sports events. Key highlights include:

- **Protection of Public Order During Sports Events Act:**

This foundational document regulates measures to prevent sports hooliganism:

- Defines the responsibilities of event organisers, police, and security companies.
- Establishes penalties for different forms of misconduct, including fines and bans from attending sports events.

- **Main Provisions:**

- Mandatory video surveillance and access control in sports facilities.
- Organisation of segregated zones for fans of different teams.
- Introduction of lists of individuals banned from attending sports events.

Organisational and Preventative Measures:

1. **Security Measures by Host Clubs:**

- Clubs are required to ensure reliable security, which may be provided by law enforcement or licensed private security companies.
- Security plans must be prepared and coordinated with the Ministry of Interior (MoI) for high-risk matches.

2. **Private Security Engagement:**

- Events can be secured by licensed private security firms, which are required to submit a security plan to the MoI.

Other Legislative Frameworks:

1. **Act on Physical Education and Sport:**

This law sets the conditions for organising sports events and maintaining sports facilities, obligating clubs and federations to implement safety measures in line with international standards.

2. **National Sports Security Program:**

Bulgaria implements specific strategies that include staff training, crowd management, and combating hooliganism. These measures are supported by joint actions from the Ministry of Interior and sports organisations.

3. **Administrative and Penal Provisions:**

Legislation includes:

- Severe penalties for violators
- Regulations for cooperation among organisers, law enforcement, and local authorities during events.

Prevention Mechanisms and Organisational Measures:

1. Hiring private security companies to maintain order at stadiums and sports facilities.
2. Ensuring segregation zones for supporters of different teams.
3. Mandatory video surveillance at all major sports facilities.
4. Strict control of pyrotechnics and alcohol use.
5. Coordination of activities between the police and organisers:
 - Risk analysis and the development of preventive and security plans.
 - Presence of uniformed and plainclothes officers during sports events.
 - Establishment of specialised police units to manage incidents.
6. Collaboration with fan clubs:
 - Engaging fan clubs to promote ethical behaviour.
 - Organising educational and cultural initiatives to reduce aggression.

International Cooperation:

Bulgaria follows recommendations from international organisations such as UEFA, FIFA, and the Council of Europe to prevent hooliganism. Key activities include:

1. **Exchange of Information:**
 - Sharing information about high-risk individuals through networks like the European Platform on Football Hooliganism and the National Football Information Points (NFIPs) network.
2. **Annexes and Specific Measures:**
 - **Annex to Security Firm Contracts:**
 - Requires staff training for handling high-risk situations.
 - Regulates the inspection of spectators and the removal of prohibited items.
 - **Annex to Agreements with Fan Clubs:**
 - Specifies fan rights and obligations during events.
 - Includes measures for self-regulation and cooperation during violations.
 - **Annex to Security Plans:**
 - Details evacuation measures and additional protocols for violent incidents.
3. **Technological and Infrastructure Solutions:**
 - Adoption of facial recognition systems to identify high-risk fans.
 - Implementation of electronic tickets with personal identification to track attendees.
 - Installation of barricades and buffer zones to reduce physical conflicts between fans.

2 - Challenges and incidents

1. Outdated Legal Framework:

- There is a pressing need to update laws related to sports.

2. Infrastructure Issues:

- Some sports facilities lack adequate safety features.

3. Incidents:

- Most sports events in Bulgaria occur without major incidents. However, occasional issues related to football hooliganism include:
 - Use of pyrotechnics and physical altercations.
 - On October 16, 2023, protests against the Bulgarian Football Union (BFU) have been held in Sofia, during the EURO 2024 qualifying match between Bulgaria and Hungary. Following escalations (fights and pyrotechnics), 35 individuals from various fan fractions were detained, with most facing fines and bans from attending sports events under the Protection of Public Order During Sports Events Act.

MAJOR INCIDENTS AND ANALYSIS OF SPORTING EVENTS FROM RECENT SEASONS

<i>Category</i>	<i>Season 2020-2021</i>	<i>Season 2021- 2022</i>	<i>Season 2022- 2023</i>	<i>Season 2023- 2024</i>
Football matches	223	221	279	281
Total number of spectators	247.802	465.135	688.945	914.122
Total number of Ministry of Interior officers, providing security	21.099	27.902	35.581	45.277
Committed offences	17	31	54	59
Damaging of property	0	0	0	0
Destruction of property	0	0	0	0
Indecent behaviour	0	2	1	2
Inciting brawls	2	1	3	4

Involvement in brawls, assault	1	2	1	1
Attacking the referees	0	0	0	2
Invasion on the sports ground	2	1	1	2
Use of prohibited objects	9	22	37	35
Throwing of objects on the sports ground	0	0	2	1
Refusal to follow the orders of an official authority	0	1	1	2
Other	3	2	8	10
Use of pyrotechnics:	379	845	1363	1568
- Smoke bombs	40	164	309	346
- Torches	322	612	971	923
- Homemade pyrotechnics	17	69	83	299
Arrested persons	88	15	105	153
Punished persons	66	27	58	48
Banning orders (mandatory administrative measure)	65	24	58	48
Fines imposed	26	23	16	31
Community service	40	3	16	9

3 - Key provisions in Bulgarian legislation

1. Definition of Football Hooliganism:

- Actions include violence, vandalism, racist insults, throwing objects, public disorder, and other aggressive behaviours related to sports events.

2. Preventative Measures:

- **Bans on Attending Sports Events:** Courts can impose bans on attending sporting events for a specified period (from 1 to up to 5 years)
- **Fan Cards:** Certain clubs require fan identification cards for better control.
- **Ticket Sales Control:** Measures to ensure accountability in ticket distribution.

3. Penalties for Hooliganism:

- **Fines and Arrests:** Significant financial penalties for disruptive behaviour (fines from 500 to 5000 BGN depending on the severity of the violation).
- **Detention:** Detention in the local structure of the Ministry of Interior for a period of up to 25 days, depending on the severity
- **Community service:** of 60 to 220 hours

4. Sanctions for Organisers and Clubs:

- Clubs may face fines or sanctions for inadequate safety measures.
- Matches may be held without spectators or teams penalised by losing points.

5. Police Control:

- Creation of risk profiles for known hooligan groups and proactive actions to limit their activities.
- Mandatory video surveillance in all stadiums.
- Alcohol restrictions around sports facilities.

6. Judicial Measures:

- Violators may be subjected to expedited court proceedings.

4 - National structures and responsibilities

The structure and responsibilities of Bulgarian authorities regarding sports and security involve coordination among state institutions, local authorities, sports federations, and law enforcement agencies. The main aim is to ensure the safety of sports events, protect athletes, spectators, and infrastructure. The primary entities and their functions include:

1. Ministry of Youth and Sports (MYS):

- Develops strategies and policies for sports development.
- Supports and funds sports federations and clubs.
- Manages sports infrastructure.

- Collaborates with other institutions to ensure safety at sports events.
- Implements policies to prevent incidents and violence in sports.

2. Ministry of Interior (MoI):

- Maintains public order and security during sports events.
- Prevents and combats football hooliganism and other forms of violence.
- Maintains a database of individuals posing risks during sports events.
- Controls access to stadiums and sports facilities.
- Works with sports clubs and event organisers.
- Manages mass gatherings and prevents conflicts.

3. National football information point (NFIP):

- Established as part of the General Directorate “National Police” to coordinate actions related to sports security.
- Operates under European and national legislation, with its activities defined by the Protection of Public Order During Sports Events Act.
- Functions include:
 - Assisting authorities and individuals organising sports events.
 - Ensuring public order and the security of sports facilities.
 - Conducting risk analyses and preparing relevant reports.
 - Collaborating with international bodies to combat anti-social behaviour at sports events.

For international sports events, the centre coordinates international police cooperation, exchanging information, including personal data, about individuals posing risks at sports events. It provides relevant details about Bulgarian nationals under sanctions or restrictive measures at least five days before the event.

Additional Responsibilities:

- Issuing directive letters and informational documents regarding fan travel.
- Collecting and systematising information about international events involving Bulgarian citizens, such as demonstrations and parades.
- Analysing issues and deficiencies related to the enforcement of administrative measures under Protection of Public Order During Sports Events Act.
- Training personnel within the country.
- Recommending the delegation of staff to high-risk football matches to observe and apply best practices.
- Collaborating with institutions and international organisations such as the BFU, UEFA, FIFA, and NFIPs.
- Initiating operational information-sharing to assess risks for upcoming sports events.
- Organising statistical records on incidents, violations, and imposed sanctions.

The centre actively cooperates with the Ministry of Youth and Sports (MYS), sports federations, professional clubs, private security firms, local authorities, UEFA, and fan organisations. It also maintains operational contacts with Europol, Interpol, and third parties for real-time updates and information-sharing.

Bulgarian Football Union (BFU)

The BFU's primary responsibilities include:

- **Managing Football in Bulgaria:**
 - Organising professional and amateur football leagues.
 - Licensing clubs and stadiums.
- **National Team Development:**
 - Preparing national teams (men, women, youth) for international tournaments.
- **Technical and Coaching Education:**
 - Conducting training programs for coaches and referees.
 - Applying international standards in education.
- **Football Promotion:**
 - Campaigns to popularise football among children and youth.
 - Collaborating with media to highlight key events.
- **International Cooperation:**
 - Partnering with FIFA and UEFA for national football development.
 - Participating in international projects and programs.
 - Assisting the Ministry of Interior on sports safety and security matters.

Other Key Entities and Roles

1. **Bulgarian Olympic Committee (BOC):**
 - Develops sports on a national and international level.
 - Cooperates with international organisations to ensure the safety of Bulgarian athletes during global events, including the Olympic Games.
2. **Sports Federations and Clubs:**
 - Organise safe sports events, including hiring security.
 - Establish internal rules for behaviour and safety.
 - Collaborate with law enforcement to prevent incidents and ensure spectator safety.
3. **Regional and Municipal Authorities:**
 - Maintain local sports infrastructure.
 - Organise regional sports events.
 - Create response plans for incidents at sports facilities.
 - Monitor municipal sports facilities to ensure compliance with safety standards.

Key Interaction Aspects

1. **Interinstitutional Cooperation:** Ministries, federations, and law enforcement work together to ensure security.
2. **Prevention:** Campaigns and educational initiatives aim to reduce sport-related violence.
3. **Response:** Coordinated actions during incidents, including specialised police intervention.

5 - Best Practices

- Conducting risk analyses.
- Holding organisational meetings with all potential partners.
- Gathering, systematising, and analysing information.
- Establishing gathering points, parking zones, and fan transportation routes that minimise physical contact between rival groups.

Other measures include precise timing for organised fan movements, ensuring experienced staff conduct access control, and setting up effective communication channels during events. Emergency protocols are in place for evacuations, inspections of facilities, and addressing hazardous situations like unsecured manholes or insufficient lighting.

Operational Measures and Safety Planning

1. **Fan Management During Events:**
 - Organising fan transportation to the venue with precise timing to avoid congestion at entry points.
 - Selecting routes that minimise contact between rival groups and ensure the safety of visiting supporters.
 - Employing experienced staff for ticket verification and physical checks at entry points.
2. **Event Preparation:**
 - Inspecting seating areas and the venue surroundings for hidden pyrotechnics, dangerous objects, and potential hazards.
 - Addressing issues like ongoing construction, unsecured manholes, poor lighting, and icy conditions promptly.
3. **Control Measures During Events:**
 - Ensuring corridors and staircases used by spectators are unobstructed.
 - Keeping gates between spectator sections and exits securely closed but not locked to enable quick evacuation if necessary.

4. **Command and Surveillance:**

- Establishing a command centre for visual monitoring of the venue, its surroundings, visitors, and staff.
- Utilising video surveillance rooms or selecting locations with optimal visibility for managing operations.

Technological and Infrastructure Solutions:

Bulgaria is actively implementing advanced technologies and infrastructure enhancements to improve safety, including:

1. **Facial Recognition Systems:**

- Used to identify high-risk individuals among attendees.

2. **Electronic Ticketing:**

- Tickets linked to personal identification for better tracking and control of visitors.

3. **Physical Barriers and Buffer Zones:**

- Installing barricades to separate rival fan groups and reduce physical conflicts.

4. **Modernised Stadiums:**

- Investments in new sports facilities and the modernisation of existing ones, with features like:
 - Emergency exits.
 - Medical stations.
 - Advanced lighting and sound systems.

Outcomes and Observations

- **Improved Security:**

Significant enhancements in the safety and management of sports events.

- **Educational Campaigns:**

Numerous campaigns and training sessions have promoted best practices.

- **Enhanced International Cooperation:**

Bulgaria is recognised as a reliable partner in global initiatives for sports safety.

Conclusion

Bulgaria has undertaken substantial measures to modernise its sports infrastructure and improve safety during events. By aligning with the Saint-Denis Convention, the country demonstrates its commitment to ensuring a safe, secure and inclusive environment for sports.

The integrated approach involving legislative changes, advanced technologies, international cooperation, and the engagement of sports organisations and fan communities are yielding positive results. Continued investments in infrastructure and capacity-building will further enhance Bulgaria's reputation as a safe destination for sports events.

6 - Annexes

<https://mvr.bg/psychology/en/the-institute/legal-framework/legal-framework-and-documents>

<https://www.ciela.net/svobodna-zona-normativi/view/2135494582?i18n-id=2>



Protection of Public
Order during Sports

<https://www.ciela.net/svobodna-zona-normativi/view/2137187621?i18n-id=1>



Act on Physical
Education and Spor

PART 2 - REPORT BY THE MONITORING TEAM

SECTION A - Executive Summary

The Council of Europe monitoring visit to Bulgaria was held by a team appointed by the Committee of the Saint-Denis Convention (T-S4), (hereafter referred to as the “team”, the “Committee” and the “Convention”, respectively).

As usual, the team comprised experts in the three pillars of the Convention - safety, security and service -, representing Parties – Greece and Türkiye - and non-State observers – Football Supporters Europe (FSE) and UEFA. For the first time, and in light of a peer-to-peer evaluation approach, the team comprised representatives of the two countries that hosted the most recent visits, Greece and Türkiye, respectively in May and November 2024.

The visit was formally requested by the Bulgarian Government, following a suggestion made by the Committee, in accordance with its Guidelines on Monitoring. Bulgaria was one of the 14 member States that had signed the Convention on the occasion of the ceremony of opening for signature on 3 July 2016 in Saint-Denis (France). Bulgaria ratified it on 10 December 2019 and the Convention entered into force in Bulgaria on 1 February 2020.

This visit to Bulgaria was the fourth monitoring visit of the Committee since it was established in April 2021 and is part of its 2022-2025 multiannual programme of monitoring visits.

This visit was carried out as an illustration of the willingness of the Bulgarian authorities to seek support of the Committee in implementing several reforms in the field of safety, security and service at football matches and other sports events, including changing their legal and regulatory framework; implementing a new institutional and administrative framework; improving policies and practices; and modernising the sports infrastructures across the country. The ultimate aim is to reach the desired balance between the safety, security and service pillars of the Convention.

The team welcomes the comprehensive efforts made by the Bulgarian authorities to implement more effectively the principles and standards of the Saint-Denis Convention. Notably, the team appreciates the current legislative process led by the Parliament to adopt a modern law on safety, security and service at sports events, as well as the efforts of the Government to modernise the sports infrastructures.

The primary aims of this visit were to assess the recent or ongoing arrangements on the legal, regulatory and institutional frameworks on safety, security and service at football and other sports events, against the provisions of the Convention; and to identify good practices and lessons learned that can be beneficial for the other Parties and Observers to the Convention.

The goal of this monitoring exercise is to ensure compatibility with and assess the level of implementation of the Convention’s principles, provisions and standards and, wherever

applicable, offer recommendations for incorporation into national policies, procedures and practices.

Following the team's recommendations, Bulgaria will present official comments as well as an Action Plan to the Committee, as a follow-up of the report, as per the Monitoring Guidelines (paragraph 5.9).

The team appreciated the overall organisation of the visit and the efficient, constructive and transparent way it was ran, with a rich and interactive programme, comprising several meetings with relevant public and private stakeholders and visits to the two main stadiums in Sofia – “Georgi Asparuhov” stadium, home of PFC Levski Sofia club, and “Vasil Levski” national stadium. At the end of the visit, the team was able to follow the final safety and security preparations, follow the fan walks of the two teams, and attend the most important derby match PFC CSKA vs PFC Levski, at the national stadium.

Overall, there are seven positive aspects to highlight in the organisation of this visit, which can be taken as good practices for future monitoring visits, namely:

- i. The composition of the visiting team, which, for the first time, was based on a peer-to-peer evaluation approach, by including representatives from the two most recent host countries (Greece and Türkiye);
- ii. The length of the visit, which comprised four compact days, thus enabling the team to meet several public and private stakeholders, complemented with numerous informal discussions with the hosts;
- iii. The strong engagement both of the executive and legislative powers in the visit: the team was hosted by two Deputy Ministers of the Interior and the Minister and Deputy Minister of Youth and Sports; as well as by the head of the Parliamentary Committee on Internal Security and Public Order and the deputy head of the Parliamentary Committee on Youth and Sports Matters;
- iv. The broader scope of the visit, covering football and basketball, and including meetings with the Football and Basketball Unions, the two main football clubs of the capital, as well as supporters’ representatives;
- v. The holding of a joint press conference, including the Ministries of Interior (NFIP) and of Youth and Sports, the Football Union and the team, to explain the nature and aim of the visit, and to give a first snapshot on the way the visit was held;
- vi. The possibility for the team to be split and follow the fan walks of both clubs from the city centre to the stadium, thus better feeling the atmosphere around the match and the fan experience; and
- vii. The availability of the team to, in parallel to reporting on the visit, comment on the draft law currently being discussed at the Parliament, aiming at ensuring that the new law is better aligned with the Convention.

The Bulgarian political authorities expressed their full commitment in further implementing the Convention from national to local level.

As usual, this monitoring visit was also the opportunity for national public and private stakeholders to accelerate the legislative process and/or to set up coordination arrangements and multi-agency meetings, sometimes for the first time, as it was the case of the first meeting between public authorities and supporter representatives, to exchange and update each other. In this sense, these monitoring visits often contribute to accelerating domestic procedures and arrangements, hence reinforcing the integrated multi-agency approach at national level.

The Physical Education and Sports Act serves as the foundational legal framework governing sports activities in Bulgaria. This Act outlines the responsibilities of various stakeholders, including state and local authorities, sports organisations, and educational institutions, in promoting and regulating physical activity, physical education, and sports. It emphasises principles such as transparency, public interest protection, and equal access to sports facilities and activities.

Legislative Proposals

In February 2025, a draft law on Safety and Security at Sports Events was submitted to the National Assembly. This proposal aims to implement zero tolerance for hooliganism and enhance measures against disorderly conduct at sports events. A working group has been established to refine the bill's provisions.¹

In the light of these events, the Bulgarian authorities have adopted a significant number of specific measures to tackle criminality linked to sporting events, among which, the team would like to highlight the following:

- a) Updating the specific legal framework related to the fight against sport-related violence by implementing some of the most important provisions of the Convention. It is worth mentioning as a very good point that the new law proposes a National Coordination Committee (composed of 11 members), chaired by a representative of the Ministry of the Interior plus the Deputy Minister of the Interior, the Deputy Minister of Youth and Sports, the Deputy Minister of Justice, the Deputy Minister of Regional Development and Public Works, the Deputy Chairman of the State Agency for National Security, the Chairman of the Board of the National Association of Municipalities in the Republic of Bulgaria.

This National Coordination Committee provides an opportunity for all parties involved to work together at a strategic level in defining and refining a range of safety and security measures, including national policies on issues such as pyrotechnics, entry checks and controls, counter-terrorism measures as well as threats related to organised crime (e.g., related to counterfeit tickets and the sale of such tickets).

The Committee shall monitor the effectiveness of the inter-agency measures applied to ensure safety and security at international sporting events involving national and club teams on the territory of the Republic of Bulgaria and abroad.

¹ See news: https://www.bta.bg/en/news/bulgaria/838586-safety-and-security-at-sports-events-discussed-at-sofia-meeting?utm_source=chatgpt.com

Points to be noted: 1) this is very good practice that should be promoted; and 2) more clarity is needed regarding the establishment of local coordination committees, their composition, roles and responsibilities.

- b) Increase of the sanctions' threshold for non-compliance with safety and security legal provisions.
- c) Implementation of a new policy for the certification of sports venues and a new approach to the monitoring of safety and security conditions related to the specific infrastructure of sports events.

Points to be noted: There is a need for greater clarity with regard to the standards and procedures for the certification of sports facilities in Bulgaria.

- d) Use of new technologies for the benefit of law enforcement agencies and sports bodies (high-performance CCTV systems as a mandatory condition for certification, and nominative e-ticketing system).

Points to be noted: 1) The CCTV is a very good practice that should be promoted; 2) the e-ticketing system is not yet fully in place and doesn't yet include all types of banning orders applied at national level.

Many stadiums in Bulgaria are aging and in need of upgrades to meet modern safety and comfort standards. Some clubs, like Ludogorets, have invested in newer facilities, while others rely on government and private funding for renovations.

The football stakeholders noted that the stadium infrastructure across all of Bulgaria was a limiting consideration which prohibits the implementation of improvements to meet the service provision. Also, although the Government set minimum safety standards through its licensing every year, there is no incentive for football clubs to aspire to a desirable safety and service standard.

Other countries throughout Europe also have this issue, with some of the football stadiums in the lower positions of the football pyramid with poor infrastructure. To motivate the clubs to improve the infrastructure, the football authorities have implemented a stadium grading system, whereby for each club to gain promotion, they must not only win the particular football league but also meet the criteria set out in the grading improvements to the next level (an example of this process is the UK [FA National League System ground grading documents \(thefa.com\)](https://www.thefa.com/leagues-tables/league-tables/ground-grading)). In the implementation of such a system the main barrier are the stadium size, location and ownership, which is either the State, municipality or private ownership. To address this issue, the Bulgarian Football Union (hereafter referred to as "BFU") could set a desirable standard and then it is up to the club, if it aspires for promotion, to address the infrastructure problems.

The stadium infrastructure and safety systems such as CCTV, public address, turnstile monitoring, fire alarms, and backup generators are not all contained in a single control room and therefore lack full integration in accordance with the [T-S4 Recommendation \(2021\)1](#).

Another deviation from the T-S4 recommendations is the lack of a fully integrated approach with both the safety management of the stadium and the Police commanders in most stadiums.

For these recommendations to prevail, the club safety/security management and Police should be housed in the same control room to support each other and provide swift control, command, communication and co-operation to address minor or major incident. It is understood that Bulgarian Law states that the Police are solely responsible for matchday security, and this is the reason the Safety Management and Police are generally in separate locations on matchday, although they do have protocols for control and command, to address matchday incidents.

There were 320 security/stewards and 1957 Police in attendance for the derby match, and although the team was not able to ascertain the deployment plan or training of staff for the private security company, it is understood that all security staff are licenced by the Police and have a robust training regime in general security; however, this is not specific to stadium safety, security and service.

Returning to the general context, it should be stressed that the vast majority of stakeholders met in Bulgaria during the visit identified and highlighted stadium poor infrastructure as an issue and violence associated with sports events as a social problem. They also stressed that some of the most organised groups of ultras had a significant negative impact on the owners, staff and players of football clubs in particular and on the BFU in general. Ongoing pressure from some of the ultras was particularly evident in relation to ticketing, stewarding, CCTV surveillance and the use of pyrotechnics.

The entry into force of the new legal framework and the strong commitment of the Bulgarian authorities to implement the zero-tolerance approach to violence, is reinforced with the willingness of the majority of sports clubs to distance themselves from noncompliant ultras groups.

The report stresses that the aim of the visit is not to criticise, but rather to support the authorities and other relevant stakeholders in Bulgaria to develop and implement a strategy designed to demonstrate compliance with the Convention and provide a safe, secure and welcoming environment at football matches and other sports events.

To assist this process, the report is presented in a thematic structure that reflects the policy articles of the Convention and provides an assessment of the action necessary to assist the authorities in Bulgaria to adopt and implement policies and practices that are consistent with the intent of its articles.

In preparing this report, the team is mindful of previous incidents in Bulgaria which acted as a catalyst for the Government to reinforce the sports safety and security laws with very robust and far-reaching sanction, along with new committees to help set a strategic framework for improvements in safety, security and service. The Government should be commended in this endeavour as it seems from the team's perspective that for the first time the Government, Policing, BFU and clubs are in complete collaboration in solving the violence and anti-social behaviour in football, the one missing component in this endeavour being the dialogue with the fan groups.

The overall conclusion set out in the report is that a review of the current safety, security and service arrangements at football events in Bulgaria, and the implementation of the new legal framework will be required if the authorities and partner agencies are to be able to demonstrate compliance with the Convention and associated good practice. This conclusion is reflected throughout the report and its 84 recommendations. These recommendations are set out in the form of a draft action plan which highlights, *inter alia*, the need for:

- developing a Strategy and Action Plan for the future National Coordination Committee;
- developing a national strategy for improvements in stadium infrastructure;
- improved stadium safety licensing and stadium safety management operating arrangements;
- an obligation for all stadiums hosting professional football matches to have a designated, trained and assessed as competent stadium safety officer, tasked with responsibility for all in-stadiums safety and security;
- more effective arrangements for ensuring that all stadium safety and security personnel, and supporter and accessibility liaison officers, are trained and assessed as competent to undertake their various tasks;
- a review of policing football operations to ensure that strategic and tactical decisions reflect established European good practice; and
- more effective inclusion and, importantly, exclusion (banning order) arrangements.

The team fully recognises that the recommendations contained in this report represent a significant number of work streams and that it will take time to customise, define, adopt and implement the actions necessary.

The team would therefore like to stress that the Committee is wholly committed to providing the governmental and football authorities, and other competent agencies, in Bulgaria with further support in meeting the challenges that lie ahead. The Committee will follow-up the progress made by the authorities in Bulgaria concerning implementation of the recommendations in this report, as established in the T-S4 Guidelines on Monitoring.

In conclusion, the team would like to put on record its gratitude for the willingness of all parties met during the visit to engage in open discussion and welcomes the commitment expressed to sharing experiences and expertise with their European counterparts.

Finally, the delegation would like to thank all of the colleagues in Bulgaria who provided much appreciated help and support and demonstrated impressive levels of patience throughout the visit.

SECTION B - Visit Background and Explanation

B.1 - Structure of the Report

In addition to the foregoing executive summary (Part 2, Section A), this report comprises three sections and four appendices, which together provide the main observations and recommendations of the monitoring visit (hereafter described as the “visit”) undertaken on 27 February – 2 March by a team of the Council of Europe’s Committee on Safety and Security at Sports Events.

The Section B provides essential background to, and an explanation of, the visit and its purpose.

The Section C is the main body of the report, it outlines the intent of each policy Article of the Convention and provides recommendations on measures that Bulgaria can apply in order to demonstrate compliance with the principles and outcomes enshrined in the Convention.

The Section D summarises the report’s key conclusions in a draft action plan designed to assist the Bulgarian authorities in submitting an Action Plan to the Committee, in accordance with the T-S4 Guidelines on Monitoring. This draft action plan highlights the 84 recommendations, each of which is allocated a priority status of "essential", "important" or "desirable". This terminology is used to indicate the relevance of each action in demonstrating compliance with the Convention and established European good practices. In reality, timescales are inevitably influenced by a number of factors, not least of which is the need to establish enabling legislative provisions.

This report’s recommendations also take account of the good practices on safety, security and service set out in the three adopted Recommendations (2021)1, (2022)1 and (2022)2 of the Committee.

The report is augmented by a number of appendices, including:

- The Council of Europe Convention on an Integrated Safety, Security and Service Approach at Football Matches and Other Sports Events – (CETS No 218) - Compliance with Policy Articles;
- The meetings’ attendees;
- Match details; and
- BFU Social Responsibility Strategy.

For ease of reference, the term “football events” is used throughout the report; however, where appropriate, the delegation’s observations and findings can also be applied to other major national and international sports events designated by the Ministry of Youth and Sports as falling within the scope of the Convention.

B.2 - Purpose of the Visit

The purpose of the visit was to provide advice and support to Bulgaria in:

- demonstrating compliance with the new Council of Europe Convention (T-S4, CETS No. 218) on an integrated safety, security and service approach at football matches and other sports events, open for signature on 3 July 2016; and
- demonstrating compliance with established good practices set out in Council of Europe T-S4 Committee's Recommendations (2021)1, (2022)1 and (2022)2, ensuring that football stadiums (and other sports venues) provide a safe, secure and welcoming experience for spectators and other participants.

The visit was duly organised for February/March 2025, as foreseen in the Committee's multi-annual programme of monitoring visits 2022-2025. This report and its recommendations set out the outcome of that visit.

This report compares the current safety, security and service arrangements in connection with football and other sports events played in Bulgaria with the core principles and outcomes enshrined in each of the policy articles contained in the Convention and established good practices on safety, security and service (Part 2, Section C).

The report pays tribute to the organisers of the visit who ensured that the delegation was able to meet with, *inter alia*, high level representatives from the Government and the National Assembly, as detailed in Appendix B.

The team was aware from the outset that during a 4-day visit it would not be possible to conduct an in-depth assessment of every aspect of the safety, security and service arrangements in connection with football and other sports events in Bulgaria.

Following and based on the team's draft action plan, Bulgaria will submit an Action Plan for adoption by the Committee, as per the Monitoring Guidelines (paragraph 5.9).

The team also recognises that, during the visit, some questions or remarks might have been misinterpreted. However, the team can only comment on what it was told and what it observed which may or may not be wholly indicative of the wider situation in Bulgaria.

In submitting this report, the team wishes to stress that its purpose is not to criticise, but to support the authorities and other relevant stakeholders in Bulgaria through the provision of external and expert observation in respect of football safety and security.

This is important as safety, security and service arrangements are and must remain the preserve of each national State. This report and any subsequent advice are not intended to undermine that core principle.

Moreover, the team fully acknowledges the wide variations in the constitutional, judicial, policing, cultural, and historical circumstances, and the equally varied character and severity

of football-related incidents and risks, which exist among and within each national State. This precludes universal application of definitive models of good practice. The reality is that the wide range of established good practices set out in T-S4 Recommendations (2021)¹, (2022)¹ and (2022)², invariably need to be customised to meet national imperatives and circumstances.

T-S4 Recommendations - Sport (coe.int)

B.3 - Visit Itinerary

Although the duration of the visit was focused exclusively on Sofia, the visit organisers in Bulgaria were able to provide an intensive and meaningful itinerary comprising a series of meetings with high level representatives detailed below.

The team did meet with a leader of a supporters' organisation, who is a key stakeholder for the Convention.

Thursday, 27 February 2025

09:30–09:50	Pick up from the hotel transfer to the Ministry of Interior
10:00–11:00	Meeting with the Minister of Interior
11:10–12:00	Meeting with the Parliamentary Committee on Internal Security and Public Order
11:30–13:00	Lunch
13:00–13:20	Transfer to the Ministry of Youth and Sports
13:30–14:30	Meeting with the Minister and Deputy Minister of Youth and Sports
14:30–14:50	Transfer to hotel
15:00–18:00	Free time
18:00–18:20	Transfer to restaurant
18:30–20:30	Dinner
20:30–20:50	Transfer to hotel

Friday, 28 February 2025

09:00–09:50	Transfer to BFU base (Boyana)
10:00–11:00	Meeting with the President of the BFU (BFU representatives and football clubs' representatives)
11:30–13:00	Lunch
13:00–13:20	Transfer to the stadium "Georgi Asparuhov"
13:00–14:30	Visit to football club PFC Levski Sofia
15:00–15:30	Press conference at General Directorate National Police
16:00–16:30	Transfer to hotel
19:00–21:00	Dinner at restaurant

Saturday, 1 March 2025

09:30–10:00	Pick-up and transfer to PFC CSKA Sofia headquarters
10:00–11:00	Visit to football club PFC CSKA Sofia
11:00–11:30	Transfer to General Directorate of the National Police

12:00-13:00	Meeting with Basketball Federation
13:00-14:00	Lunch
14:30-16:00	Meeting with supporters PFC Levski Sofia
16:45-17:30	Transfer to hotel

Sunday, 2 March 2025

09:00-10:00	Pick up from hotel and transfer to national stadium “Vasil Levski”
10:00-16:00	Assist to preparatory security meeting and to the football match organisation Bulgarian football derby PFC CSKA Sofia – PFC Levski Sofia

Overall, there are seven positive aspects to highlight in the organisation of this visit, which can be taken as good practices for future monitoring visits, namely:

- i. The composition of the visiting team, which, for the first time, was based on a peer-to-peer evaluation approach, by including representatives from the two most recent host countries (Greece and Türkiye);
- ii. The length of the visit, which comprised four compact days, thus enabling the team to meet several public and private stakeholders, complemented with numerous informal discussions with the hosts;
- iii. The strong engagement both of the executive and legislative powers in the visit: the team was hosted by two Deputy Ministers of the Interior and the Minister and Deputy Minister of Youth and Sports; as well as by the head of the Parliamentary Committee on Internal Security and Public Order and the deputy head of the Parliamentary Committee on Youth and Sports Matters;
- iv. The broader scope of the visit, covering football and basketball, and including meetings with the Football and Basketball Unions, the two main football clubs of the capital, as well as supporters’ representatives;
- v. The holding of a joint press conference, including the Ministries of Interior (NFIP) and of Youth and Sports, the Football Union and the team, to explain the nature and aim of the visit, and to give a first snapshot on the way the visit was held;
- vi. The possibility for the team to be split and follow the fan walks of both clubs from the city centre to the stadium, thus better feeling the atmosphere around the match and the fan experience; and
- vii. The availability of the team to, in parallel to reporting on the visit, comment on the draft law currently being discussed at the Parliament, aiming at ensuring that the new law is better aligned with the Convention.

B.4 - Committee Team

For this monitoring visit, and respecting the principle of a peer to peer evaluation, the team was composed of:

- National delegates to the Committee:
 - Mr. İnanç Özçakmak, Deputy General Director of International Relations (Turkish Ministry of Youth and Sport), Head of the T-S4 Turkish delegation, Chair of the T-S4 Advisory Group on Legal Issues (Team leader)
 - Mr. Chrysostomos Gkikas, Head of NFIP Greece (Security)
- Observers to the Standing Committee:
 - Mr. Juha Karjalainen, UEFA Senior Safety and Security Expert (Safety and Service)
 - Mr. Ronan Evain, CEO of Football Supporters Europe (FSE) (Service)
- Rapporteur:
 - Mr. Rick Riding, Independent Event and Stadiums Safety Advisor
- Secretariat:
 - Mr. Paulo Gomes, Head of the Saint-Denis Unit, Secretary of the Saint-Denis Convention, Council of Europe
 - Ms. Marie-Françoise Glatz, Secretary of the Saint-Denis Convention, Council of Europe.

B.5 - Supporting Documentation

To assist the visit, the authorities of Bulgaria provided a national report (Part 1) containing a range of important background information. This proved to be of assistance prior to and during the visit, not least in terms of outlining the legislative, regulatory, strategic and operational framework governing the safety, security and service arrangements in connection with football events in Bulgaria.

B.6 - Status of the Report

As stressed above, the team would like to repeat the reassurance offered at every opportunity during the visit that the aim of this report is to support and assist the authorities in Bulgaria in providing a safe, secure and welcoming environment at football matches and other sports events, in compliance with the principles and standards set by the Convention and its Recommendations.

All States that sign, and subsequently ratify, the Convention are obliged to ensure that their legal and operating arrangements comply with the content of the Convention's policy articles. To assist States in achieving this obligation, and in recognition of the diversity of national imperatives and circumstances, the policy articles are largely focused on key principles and outcomes.

To support States in adopting and demonstrating compliance with each article, the Committee has adopted Recommendation (2021)¹, which provides a wide array of established good practices on designing and delivering an integrated approach to safety, security and service in connection with football events, along with supplementary and detailed annexes on each of the three pillars of the Convention. Moreover, the Committee adopted in 2022 two additional recommendations on a model national strategy - Rec (2022)¹ - and on a model national legislative and regulatory framework – Rec (2022)².

This report, therefore, focuses on the extent to which the current legal and operating arrangements in Bulgaria are in compliance with the content of both the Convention and the above-mentioned recommendations.

In conclusion, this report should be seen as an ongoing commitment on the part of the Committee to follow-up the implementation and provide, on request, further advice and support in respect of all aspects of this report and its recommendations.

SECTION C: Saint-Denis Convention (CETS No 218) - Compliance with Policy Articles

Article 1 - Scope of the Convention

Intent

- 1.1. The Parties shall, within the limits of their respective constitutional provisions, take the necessary steps to give effect to the provisions of this Convention in respect of football matches or tournaments played in their territory by professional football clubs and national teams.*
- 1.2. The Parties may apply the provisions of this Convention to other sports or sports events hosted in their territory, including non-professional football matches, especially in circumstances where safety or security risks are involved.*

Compliance

To demonstrate compliance with the Convention, the legal framework should provide an enabling provision requiring the Ministry of Youth and Sports to maintain a schedule of all professional national and international football matches played in Bulgaria, along with any other sports events which the Ministry of Youth and Sports designate as being subject to the Convention.

- **Comments**

Integrated Approach to Safety, Security and Service

Adopting a multi-agency integrated approach to safety, security and service is imperative when hosting major tournaments and in organising the annual calendar of national and international football events. Extensive European experience and established good practice demonstrate that this approach is crucial in helping to reduce risks associated with sports events because all three pillars are inter-related and overlap. No one agency and no element of a wider strategy can prevent or tackle safety or security risks in isolation. It is imperative, therefore, that all agencies work together to ensure that the various operations are complementary.

Recommendation 1: The (proposed new) legal framework should specify that all professional football matches and other sports played in Bulgaria are subject to the articles of the Convention. In addition, the Ministry of Youth and Sports should consider and clarify in law what other sports events, if any, are subject to the Convention. (status: desirable)

Article 2 - Aim of the Convention

Intent

The aim of the Convention is to provide a safe, secure and welcoming environment at football matches and other sports events. To that end, the Parties shall:

- a. adopt an integrated, multi-agency and balanced approach towards safety, security and service, based upon an ethos of effective local, national and international partnerships and co-operation;*
- b. ensure that all public and private agencies, and other stakeholders, recognise that safety, security and service provision cannot be considered in isolation, and can have a direct influence on delivery of the other two components;*
- c. take account of good practices in developing an integrated approach to safety, security and service.*

Compliance

These are primarily policy and strategic requirements, though it would be prudent (if not essential) to include a generic commitment in law towards delivering a multi-agency integrated approach to safety, security and service in connection with football events (inside and outside of sports venues).

• Observations

The team observed that Bulgarian authorities at national level, in general, are familiar with and engaged in progressively adopting a balanced multi-agency integrated approach towards safety, security and service, based upon partnerships between the relevant public and private stakeholders.

However, the team observed that the security (policing) tenet still has primacy and prevails excessively over the safety element. Moreover, the service element is still far from being in place/implemented. This unbalanced approach was clear during the derby match attended by the team, where there were more than 1 000 police officers inside and in the outer safety perimeter of the venue, whereas there were only around 200 stewards, and there was a lack of adequate toilets and kiosks with food and beverages.

• Comments

In practice, the fact that the safety officers of the Football Union and CSKA Sofia, for instance, have a police background, raises the issue of the need to progressively separate the safety from security (policing) concepts and structures and ensure that the safety managers, coordinators

and officers have the appropriate training on safety and can effectively manage the safety operations in the stadiums on match days.

There is a need to further work towards a necessary balance between the safety, security and service elements, namely by reducing the excessive role of policing inside stadiums and investing in safety – starting with capacitation of stadiums safety officers - and service – for instance, by providing, on match days, provisional toilets and kiosks.

Recommendation 2: The new legal framework should include a generic commitment to delivering a multi-agency integrated approach to safety, security and service in connection with professional football events (inside and outside of stadiums and irrespective of the timing and location). (status: desirable)

Article 3 – Definitions

Intent

The aim of Article 3 is to encourage European-wide usage of established safety, security and service terminology.

Compliance

- **Observations**

The team observed that the concepts of safety and security are somehow confusing and not clearly understood by some stakeholders, namely due to the difficulty to distinguish them in the Bulgarian language.

- **Comments**

The legal framework should incorporate the definitions of safety, security and service, as referred to in Article 3 of the Convention, and ensure that safety and security are clearly understood and implemented as different concepts by all relevant stakeholders.

The National Coordination Committee to be established should, as a first step, in the framework of its multi-agency communication and media strategy, work on a large campaign to explain the multi-agency integrated approach to all stakeholders and general public.

It is recognised that in some European languages the terms "safety" and "security" share a common definition. As a consequence, attempting to explain the three pillars can pose difficulties. However, European good practice evidences the importance of distinguishing

between the two concepts. For ease of reference therefore, the following outline definitions have been found to be useful:

- "safety" is generally interpreted as incorporating measures designed to protect the health and safety of individuals in their capacity as spectators at an event or members of the wider community;
- "security" is generally interpreted as incorporating measures intended to prevent or respond to criminal and anti-social behaviour inside and outside of stadiums and other sports grounds; and
- "service" is generally interpreted as including a wide range of measures (services) designed to meet the needs of individuals in a manner that makes them feel comfortable, appreciated, welcome and active participants in an event - it also embraces a range of preventative measures like sports-related community projects and supporter engagement.

The above categories or pillars are only used for ease of reference, and it is imperative to recognise that initiatives developed under one of the three headings are bound to overlap and/or impact on the other two, given the extent to which they are inter-related.

The key to a successful delivery of the integrated concept centres on the adoption of a strategic approach and the need for the integrated approach to be co-ordinated effectively at national and local levels.

Recommendation 3: The (proposed new) legal framework should incorporate the definitions set out in Article 3 of the Convention. (status: desirable)

To enhance awareness of Council of Europe terminology, it would also be desirable to stress in the (proposed new) law and national strategy, that the integrated approach encompasses events inside and outside of stadiums, given their overlapping character and impact, and embraces all aspects of an event flow approach which commences with spectators making their arrangements for attending a match and concludes when they have returned home after the match. Whilst the event flow model was designed for international matches, the same logic and flow should be applied to domestic matches. Again, it is recommended that a version of an event flow model is incorporated within the national strategy.

Article 4 – National Co-ordination Arrangements

Intent

- 4.1. *The Parties shall ensure that national and local co-ordination arrangements are established for the purpose of developing and implementing a multi-agency integrated approach to safety, security and service at national and local level.*
- 4.2. *The Parties shall ensure that co-ordination arrangements are established to identify, analyse and evaluate the risks pertaining to safety, security and services, and to allow the sharing of updated information on risk assessment.*
- 4.3. *The Parties shall ensure that the co-ordination arrangements involve all key public and private agencies responsible for safety, security and service matters connected with the event, both inside and outside of the venue where the event is taking place.*
- 4.4. *The Parties shall ensure that the co-ordination arrangements take full account of the safety, security and service principles set out in this Convention and that national and local strategies are developed, regularly evaluated and refined in the light of national and international experience and good practices.*
- 4.5. *The Parties shall ensure that national legal, regulatory or administrative frameworks clarify the respective roles and responsibilities of the relevant agencies and that these roles are complementary, consistent with an integrated approach and widely understood at strategic and operational levels.*

The aim of Article 4 (1-4) is to oblige States to establish national and local multi-agency safety and security co-ordination arrangements to ensure the development and nationwide application of a comprehensive and integrated strategy. This should include a balanced approach towards safety, security and service, based upon an ethos of effective local, national and international partnerships and co-operation to ensure that all public and private agencies, and other relevant stakeholders, recognise that safety, security and service provision cannot be considered in isolation, and can have a direct influence on delivery of the other two components.

Moreover, Article 4.5 requires States to undertake a comprehensive legislative review aimed at ensuring legal clarity in respect of the roles and responsibilities of public and private agencies engaged in making football events safe and secure.

Compliance

The week prior to the visit, the Ministry of the Interior, Ministry of Youth and Sports plus the BFU met as a starter to develop a National Co-ordination Committee.

- **Observations**

Regarding national co-ordination arrangements, a working group was established in 2006, including the Ministry of Interior and the Football Union, aiming at: i) identifying the risk level

of matches and adopt strategic measures to prevent violence; ii) giving instructions to the organiser and the local police on what measures should be taken to prevent violence at a given sport event; and iii) share police statistical analysis with the Football Union. The regional directorates of the Ministry of Interior also set up similar working groups. Besides that, before each match, the police interact with the private security managers, in order to have an integrated approach, at least between safety and security.

Moreover, an ad hoc working group was established to discuss legislative reforms, including the Ministry of Youth and Sports.

One week before the monitoring visit, two meetings were held between the Parliament, the Ministries of Interior and Youth and Sports, the Football Union and clubs, to discuss the draft law on safety and security at sports events that is currently being drafted by the Parliamentary Committee on Internal Security and Public Order. The team was told that, at these meetings, it was decided to adopt a multi-agency approach and a national strategy on safety, security and service at sports events.

The importance of this strategic co-ordination is recognised by the Bulgarian Government in the setting up meeting to establish this new committee if the new sports law is enacted. It is recommended that membership was determined upon the need to provide an appropriate balance between competence, knowledge and experience and decision-making abilities.

However, for this to happen, the draft law must first be approved by the Parliament and come into force, in its improved form with the recommendations of the team.

In parallel to the visit, the team was provided with the draft law and made substantive comments and suggestions, to ensure that it is better aligned with the Convention.

• Comments

Currently, Bulgaria still doesn't have a formal national co-ordination body or arrangements that comprise all the relevant public and private stakeholders, as established in the Convention. However, the draft law currently being finished at the Parliament foresees the establishment of such a body.

The team very much welcomes the future establishment of domestic co-ordination arrangements, through a national coordination committee, as the body responsible for implementing the multiagency integrated approach, developing a national strategy and lead all stakeholders towards necessary improvements at major sport events.

With regards to the roles and responsibilities of the national co-ordination committee, this body should notably consider to:

- when developing and coordinating the implementation of a national strategy, use the Recommendation (2021) 1 of the Saint-Denis Committee, in particular Appendix A

(Safety) and Appendix C (Service), aiming at incorporating the safety and service elements in a balanced manner and Recommendation (2022)¹ presenting a Model structure of a national strategy;

- introduce educational and social prevention measures in the new legal framework as part of the integrated safety, security and service approach.
- encourage all stakeholders to consider the scope for developing preventative, social and educational projects connected with football and other sports events, at both national and local level. In particular, activities aimed at children and junior supporters should incorporate the promotion of values such as respect, tolerance, anti-violence and non-discrimination; and
- encourage sport entities, coaches, players and referees to be involved in these social and educational campaigns and projects.

Recommendation 4: The Bulgarian authorities should establish by law and implement in due time a national co-ordination committee, aiming at adopting a national strategy on safety, security and service, a multi-agency communication and media strategy and, according to the evolution of the risks and threats, updating the legal, regulatory and administrative frameworks (as envisaged in the section II of the draft law). (See T-S4 Recommendation (2022) 1 on a Model Structure of a National Strategy on Safety, Security and Service at Football Matches and other Sports Events) (status: essential)

It can add value if the document indicates which agency has lead responsibility for the implementation of each component of the strategy, along with projected timescales for implementation where possible. European experience suggests that the strategy document will need to be reviewed and refined on a regular basis, as lessons, good and bad, are learned.

During the visits, a number of issues were discussed with differing perspectives expressed by key agencies. The most obvious example of which centred on legal ambiguity and contrary views on who should fund much needed stadiums modernisation. This issue is pursued below.

Recommendation 5: The legal framework should establish the composition, role and functions of the national co-ordination committee, which should depend upon the Ministry of Interior or Sport and include representatives from all relevant public and private stakeholders. (status: essential)

Recommendation 6: The national co-ordination committee should be broken down into regional and local committees. The working arrangements at regional and local level should be captured in a framework or Terms of Reference document so that complete clarity in terms of agencies involved, primacy, aims and objectives, roles and responsibilities, and ranking of personnel expected to participate in the group are clearly defined. (status: essential)

Recommendation 7: The national co-ordination committee should establish a working group comprising representatives from local communities and supporter representatives. (status: important)

Local Co-ordination

It will be for the national co-ordination committee to determine the structure, role, membership and *modus operandi* of the regional and/or local co-ordination process.

European experience also demonstrates that it is equally important for multi-agency co-ordination arrangements to be established at regional/local level. Such arrangements are not universally in place in Bulgaria. Article 7b of the Bulgarian Law on Physical Education and Sports already obliges the Local Governor to establish a Regional Committee to act as a multi-agency liaison group to meet, but there is no indication in the regulations if this group is expected to meet on a regular basis to discuss long term policies or to agree upon the safety and security arrangements for every match. The team was advised that the Regional Committee can insist that it does so in respect of "high risk" matches and can instruct the relevant local agencies to employ additional security measures if considered necessary.

This *ad hoc* arrangement, solely focused on the next coming event, does not reflect European good practice, given the need for local stakeholders to meet on a regular basis to deliver an integrated approach (with a long-term vision); clarify the event-specific functions of each agency; oversee safety certification of stadiums and associated safety and security arrangements; and resolve contested or uncertain issues. More structured local liaison can also provide a basis for implementing at a local level the national strategy.

Moreover, the emphasis on security in the current local liaison arrangements is misplaced. Safety is a crucial consideration at all matches whereas security is inevitably risk-based and variable in character. Furthermore, the organiser is not the appropriate authority to oversee and co-ordinate this crucial function, given that: the regional committee appointed by the Governor is currently responsible for granting the organiser a safety certificate, the municipality may be the stadium owner; and multi-agency preparations need to encompass arrangements outside of stadiums.

Recommendation 8: The national co-ordination committee should i) designate a municipal or regional authority to establish a local multi-agency group tasked to oversee and co-ordinate preparations for football events held in their locality; and ii) provide guidance on the structure, role, and membership of such groups, taking into account established European good practice. (status: desirable)

As a starting point, it is suggested that the national committee should consider the following objectives and tasks in clarifying the remit of the proposed local co-ordination structure:

- ensure that local operating arrangements (inside and outside of stadiums), are comprehensive and take full account of the principles enshrined in an integrated approach to safety, security and service;
- ensure that operational strategies of local stakeholders are complementary;
- ensure that local strategies are reviewed and updated (where necessary) to reflect any refinements to the national integrated approach and post-match analysis of events connected to previous matches;
- ensure that the respective roles and responsibilities of all personnel engaged in delivery of football related operations are clear, concise and widely understood;
- ensure that multi-agency preparations clarify operational primacy;
- ensure that local liaison embraces all aspects of the wider integrated approach likely to impact on the match day dynamic, notably policing strategies, stadium licensing, ticketing, stewarding and other in-stadiums operating arrangements; local hospitality and related activities (including community and supporter and accessibility liaison); transport and other logistical factors; and crisis planning for emergency scenarios (inside and outside of stadiums);
- ensure that football supporter groups and local communities and businesses, especially those located in the vicinity of football stadiums and city centre areas (where supporters are likely to gather before and after matches) are consulted and kept informed of operational strategies in public and private spaces (including in and around football stadiums); and
- ensure that consideration is being given to identifying and delivering any football-related community and wider social preventative projects and otherwise promoting the active engagement of local football clubs and partner agencies within local communities.

The importance of local co-ordination arrangements was highlighted, and it was clear for the team that all key governmental, policing and football agencies are aware of the need for radical action to transform the football experience in Bulgaria. It was also recognised that this action would need to reflect the national strategy and be implemented at a local level if substantive progress was to be achieved.

The new Legal and Regulatory Framework

A crucial element of Article 4 centres on the need for the national co-ordination to undertake the implementation of the new law.

It is anticipated that a significant number of logistical changes at municipal and regional levels will be required to demonstrate compliance with the Convention and to deliver an effective

multi-agency integrated strategy, notably in respect of stadium safety management and exclusion arrangements.

In these circumstances, it would be desirable to reflect the outcome of the proposed review of the new Law in 2026 following its first year of implementation.

Recommendation 9: The national co-ordination committee should review the current legal framework, and identify the legal amendments necessary to ensure that it:

- complies with the Convention and the safety, security and service good practices contained in [T-S4 Recommendations](#)
- facilitates and empowers delivery of all aspects of the national integrated multi-agency strategy;
- provides clarity of roles and responsibilities of all public and private personnel engaged in football operations (inside and outside of stadiums); and
- represents a balanced approach to safety, security and service. (status: essential)

- **Comment**

Communications and Media Handling Strategy

Whilst not featured in the Convention, it is important to ensure that the ethos, principles and safety and security measures set out in the national strategy are widely understood, not only by supporters and the wider community, but also within in each operational agency at every level (ranging from high level policy makers and strategists to front line safety and security practitioners). For this to be achieved, the national co-ordination committee should set up a multi-agency communications and media handling group comprising specialists from key governmental, policing, football and other authorities.

The group's core task should be to explain and promote the core components of the national strategy. In so doing, it would be prudent for the group to develop a multi-agency protocol on liaison with the media to ensure agreed and consistent key messages are relayed in a unified manner by all agencies wherever possible. The group will also need to explore and determine the most effective means for explaining the strategy to different stakeholders, including safety and security practitioners, supporters and the wider community.

Recommendation 10: The national co-ordination committee should establish a multi-agency media and communication strategy tasked to proactively promote and explain the new integrated strategy and its components. (status: important)

Article 5 - Safety, Security and Service in Sports Stadiums

Intent

5.1. The Parties shall ensure that national legal, regulatory or administrative frameworks require event organisers, in consultation with all partner agencies, to provide a safe and secure environment for all participants and spectators.

Compliance

Article 5 is the most demanding and explicit component of the Convention. However, the primary purpose of the Article is to provide the means for developing a safe, secure and welcoming environment within football stadiums. This is likely to incorporate a number of interrelated strategic, practical and legal changes to the current stadium safety management arrangements in Bulgaria. The key elements are featured below.

- **Observations**

BFU Security Personnel

The BFU does appoint security delegates for matches, especially for those that involve higher risks or are considered more sensitive, such as derby games or international fixtures. These security delegates are typically tasked with overseeing the safety of both players and fans at the stadium. They work in collaboration with local police, stewards, and other security personnel to ensure everything runs smoothly.

The role of a security delegate includes:

- **Crowd control:** Ensuring that the crowd behaves appropriately, managing potential conflicts, and preventing incidents of violence or unruly behaviour;
- **Coordination with local authorities:** Communicating with the police and emergency services to prepare for any potential issues;
- **Stadium safety checks:** Ensuring the stadium meets all safety standards, from entry points to emergency exits;
- **Monitoring high-risk situations:** Identifying and addressing any potential security threats, such as fan confrontations or disruptions; and
- **Debrief:** post-match debriefing with clubs and stadium management.

The delegate's presence is part of the overall security measures to maintain safety at football matches. For particularly high-risk games, these security delegates play a crucial role in preventing escalation of any issues that could arise.

The proposed role of designated and trained stadium safety officers is directly linked to the extensive role of BFU security delegate and security officers as set out in the BFU Safety and Security Regulations. This issue was briefly discussed during the visit. At present, the role of BFU personnel centres on monitoring stadium safety and security arrangements for high risk matches and intervening where they consider appropriate.

In the interim, it is likely that BFU personnel will continue to play an important role; however, this is a matter that will need to be addressed in preparation for introduction of the proposed new stadium safety arrangements.

Recommendation 11: The new legal framework should clearly set the roles and responsibilities of the event organisers, including their obligation to consult with partner agencies on the safety and service plans and procedures. (status: important)

Recommendation 12: The Bulgarian authorities should review the current legal and regulatory position of club security officer and BFU security personnel, in preparation for the introduction of designated stadium safety officers. (status: important)

Recommendation 13: In the case of a safety officer and safety management team being used which are not those normally the responsible persons within the venue, a thorough review of the competence of such people should be carried out by a competent authority and, if any deficiencies are identified, appropriate amendments made to the safety management arrangements factor and, as a consequence, the maximum safe capacity level set out in the safety certificate (see: [Spectator facilities - Part 10: Calculating of safe capacity in case of emergency](#)). (status: important)

Recommendation 14: It is recommended that the event organiser develops and sets out a level of service and training expected of personnel supplied by the security company. A contract to this effect such as a service level agreement specifying the numbers, and quality of security staff should be in place (see: [T-S4 Recommendations](#)). NB: this level of service and training plan should be consistent across all of Bulgaria. (status: important)

Recommendation 15: The national co-ordination committee should make provision for the issue of a stadium safety certificate to be subject to a stadium having a designated, and accredited as competent, stadium safety officer tasked with responsibility for all in-stadiums safety, security and service matters. (status: important)

- Comments

Stadium Safety Management Arrangements

It is important that comprehensive stadium safety management arrangements complement the infrastructure of each football stadium. However, there are established good practices which can provide a starting point for developing minimum safety management standards.

Good practices to be considered and adopted, in accordance with a timetable designed to ensure that relevant personnel are trained and equipped to undertake their respective tasks effectively, should include:

1. integrated command arrangements setting out the roles and responsibilities of stakeholder agencies; clarifying who has lead responsibility in the event of an incident or emergency; and providing formal arrangements for transferring that responsibility to another agency;
2. safety and security risk assessments should be completed for every match in consultation with the police and other emergency services;
3. match organiser (or safety officer - see Recommendation 38) should develop a stewarding plan for each event based upon the risk assessment;
4. evacuation and other emergency contingency plans should be established and rehearsed in multi-agency exercises;
5. safe capacity of a stadium and each of its sectors should be determined on the basis of the evacuation capacity of each sector and the quality of the safety management of the stadium;
6. match organiser (or safety officer) should take responsibility for fire risk assessments and prepare an evacuation plan and fire safety check list, incorporating the policy on the fire resistance of flags and banners;
7. pre-event safety checks should be undertaken and recorded along with details of any remedial action taken to address any issues identified during the check;
8. first aid rooms should be available for minor spectator medical treatment or injuries, with appropriate directional signage to the facility; and stewards should be briefed on the procedures for a spectator requiring medical attention;
9. spectator safety policy should incorporate guidance on children/vulnerable adults; and
10. national standards should be set for accommodating spectators with special needs (see guidance contained within the European standard).

Recommendation 16: The national co-ordination committee should take full account of European good practices in developing minimum safety management arrangements (see: Guidance from the UK SGSA: <https://sgsa.org.uk/safety-management/>). (status: important)

Audit of Stadium Safety and Security

In addition to the actions proposed above, the national co-ordination committee, in partnership with the BFU, should liaise with relevant organisations on stadiums safety and security issues, including UEFA, regarding the possibility of appointing international experts to undertake safety inspections of all stadiums hosting professional football matches.

The aim would be to assess the specific improvements required in each stadium to demonstrate compliance with European standards and good practices. This should include monitoring of

stadium safety management operations. This proposed audit would also inform the development of enhanced technical, operating, and safety management standards by the proposed independent "stadium safety authority".

Recommendation 17: The BFU should liaise with relevant organisations on stadiums safety and security issues, including UEFA, regarding the possibility of appointing international experts to undertake safety inspections of all or selected stadiums hosting professional football matches, in order to inform the development of enhanced technical, operating and safety management standards. (status: desirable)

Intent

5.2. The Parties shall ensure that the competent public authorities put in place regulations arrangements to guarantee the effectiveness of stadium licensing procedures, certification arrangements and safety regulations in general and ensure their application, monitoring and enforcement.

5.3. The Parties shall require the relevant agencies to ensure that stadium design, infrastructure and associated crowd management arrangements comply with national and international standards and good practices.

Independent Stadium Safety Authority

Articles 5.2 and 5.3 of the Convention place an obligation on States to ensure the effectiveness of stadium safety arrangements (stadium safety certification in particular) by ensuring that national standards in respect of stadium design, infrastructure and associated safety management arrangements are in place, applied, monitored and enforced by the competent public authorities.

Compliance

The existing provisions in the field of design, infrastructure, licensing, certification and inspection are foreseen in the legislation on building, which are a competency of the local/regional authorities to enforce and inspect. In Bulgaria, the safety certification of stadiums involves compliance with several regulations and standards to ensure the well-being of spectators and participants. Key aspects include:

- Fire Safety Certificate: Depending on the stadium's capacity and function, obtaining a fire safety certificate may be mandatory. This process is governed by Ordinance No 8121z-882 of 25 November 2014, which outlines the procedure for state fire precautions control. The certificate verifies that the venue meets the necessary fire safety requirements. To acquire this certificate, an application must be submitted to the relevant Regional Directorate of the Ministry of Interior, accompanied by documents

such as a copy of the permit to use the site and proof of payment of the state fee. The certificate is valid for five years.

- Compliance with National Legislation: Stadiums must adhere to the "Law on Protection of Public Order during Sports Events", which mandates that sports events be held only at venues that comply with the requirements of the Physical Education and Sports Act. This law specifies safety and security infrastructure requirements, especially for international football matches. Additionally, sports events listed in the national sports calendar can only be conducted at stadiums after the safety and security requirements have been approved by the relevant licensed sports federation and agreed upon with the Ministry of Interior.
- European Standards: While specific standards like БДC EN 13200-1:2024 and прБДC EN 13200-10:2024 provide requirements within spectator facilities and setting a safe capacity, it's essential to consult the latest European and Bulgarian standards to ensure compliance with current safety regulations:
 - <https://bds-bg.org/en/project/show/bds:proj:125023>
 - <https://bds-bg.org/en/project/show/bds:proj:122342>

Unfortunately, this regional Committee was not met by the team.

- **Observation**

The team was told by the members of the Parliamentary committee that the new law will address the architectural aspects of safety. The new law should establish clear provisions in the field of design, infrastructure, licensing, certification and inspection of sports venues, in order to comply with the Convention.

Stadium Infrastructure

Stadiums and arenas are mostly owned either by the Government, the municipalities, and the athletic union, and only one stadium is private ([Ludogorets Arena](#)). The user of the venue (club) is responsible for managing it but, due to the under-financing of the clubs and associations, these are not able to ensure the safety, security and service standards. When stadiums are public-owned, the public authority can invest in the maintenance of the venue and on the provision of technical equipment – CCTV system, turnstiles, etc.

According to the public and football authorities that the team met with, the match-day revenues are rather low and, therefore, it is difficult for clubs to upgrade infrastructures without financial support from the State, namely because in most cases they are not the owners of those venues.

There are several stadiums being constructed. It is important that these new infrastructures include safety and security but also service standards, in order to deescalate tensions and ensure a welcoming environment.

It is consensual, among the Bulgarian authorities, that one of the main vulnerabilities is the poor sports infrastructures across the country, both stadiums and arenas. According to them, only three to five stadiums meet the necessary requirements in terms of safety, security and service, across the country.

The two main stadiums in Sofia visited by the team – “Georgi Asparuhov” stadium, home of PFC Levski Sofia club, and “Vasil Levski” national stadium -, are old and did not benefit from the necessary regular maintenance. The first was inaugurated in 1963 and the second was officially opened in 1953, extended in 1966 and renovated in 2002.

There are plans to replace these stadiums by new and modern ones, in the mid-long term.

The existence of poor infrastructures is often used by government and football authorities as the only or main argument to justify the low attendance rates, the consequent lack of financial resources, and the problems of violence and disorder in and around sports venues in Bulgaria. Hence, this is a vicious circle that at some point needs to be broken. As long as the organiser does not ensure a safe, secure and welcoming sports venue, there will be a low attendance and families, women, children and persons with disabilities will not feel motivated to come to the sports venues. These venues will tend to be mostly attended by the ultras groups and hooligans, who increase the risks and are the cause of most violence and disorderly behaviour. The lack of financial resources also hinders the organiser to invest in private security and on safety technologies, like CCTV or e-ticketing. These safety gaps are normally filled or compensated by a massive police deployment, in particular riot police units, which creates a risky disproportion between safety and security.

Assuming that the football authorities – Football Union and most clubs - do not have sufficient financial resources to ensure the maintenance or build new stadiums, except where there is a wealth owner such as in the case of Ludogorets, the State will take the lead in the construction of the new sports venues and, through public-private partnerships, will rent these stadiums and arenas to the associations and clubs for several decades, with an obligation for the later to ensure a regular maintenance of the venues.

Obviously, the argument that most sports infrastructures are poor and that there is no money to renovate them should not be used as an excuse for doing very little on a weekly basis and wait for the construction of new venues. Many quick-win initiatives could be carried out in the meantime aiming at improving safety, security and service in and around those venues. For instance, the organiser should invest in the service element, by installing provisional WC facilities and kiosks with food and beverages in the zone ex and outer security perimeter of the venue. Furthermore, the police and the stadium safety managers could invest more in the training of their personnel and in the improvement of their tactics and co-ordination and

communication mechanisms, thus enabling a better balance between the safety and security elements on match days.

New sports infrastructures *per se* will not solve all the existing problems. As mentioned in the SGSA's Green Guide, the physical infrastructure (P factor) must go along with the safety management (S factor). Once new infrastructures will be in place, the most important work will be to effectively manage the stadium operation (S factor) and train people for a good safety management.

Moreover, the new law to be adopted in the coming months, should not just aim at reinforcing the safety and security at sports venues. It is recommended that legislators find the necessary balance with the service element of the Convention, by following more closely the [Recommendation \(2021\)1, Annex C \(Service\)](#).

The team was informed that high-definition CCTV systems are already in place, at least in the main stadiums and arenas. Together with the digital ticketing system, they will definitely contribute for safer and more secure sports venues. The team visited the command-and-control room of the national stadium and observed that a CCTV system was in place. However, it was just managed by the police.

- **Comments**

Under a context where structural violence and hooliganism exist inside and around sports venues in Bulgaria, the team can understand that the priority of the Government is to modernise the legal framework and the sports infrastructures. However, these improvements should go in parallel with quick wins, including investing in capacity building of the safety managers and stewards to give them a more prominent role inside the stadiums; updating the police strategy and tactics in accordance with European and international experience; as well as investing on service measures, so as to ensure a balanced integrated approach, as advocated by the Convention.

This issue raised above of poor physical infrastructure of most of the Bulgarian football stadiums and need for significant investment in modernisation featured throughout the visit. There was also widespread recognition that these challenges were compounded by: an absence of legislative clarity regarding how and who should fund the modernisation; the differing legal and administrative status among top tier football clubs; and the impact of the economic crisis on available public and private funding.

Discussions on these inter-related matters highlighted a lack of consensus about how and who should meet the cost of modernising stadiums and related concerns regarding the absence of legal clarity in respect of whether stadium owners (primarily municipalities) or event organisers (football clubs) are responsible for stadiums infrastructure. Many European countries have resolved this position by making the event organiser responsible; however, in Bulgaria opinions are polarised.

Stadiums infrastructure and associated safety certification are crucial areas, and it is unfortunate that there appears to be an absence of a shared vision and effective communication between key stakeholders on this important matter.

- **Comments**

The new legislation should comprise safety and service standards in balance with security ones. Moreover, it should establish a national independent and competent structure responsible for stadium licensing, certification and inspection.

Recommendation 18: The national co-ordination committee should consider establishing an independent public authority tasked to: develop stadium safety standards, covering physical infrastructure, technical equipment and safety management arrangements; monitor application; assess effectiveness; and issue stadium safety certificates. (status: important)

Recommendation 19: The Bulgarian authorities should determine a strategy for modernising football stadiums in Bulgaria and clarify in law which agency should be responsible for stadiums physical infrastructure and associated improvements.

Providing legal clarity in respect of stadiums infrastructure is crucial for a host of reasons and should be addressed. However, it will not resolve the dilemma of identifying the sources of funding necessary to comply with legal obligations and otherwise upgrade the physical infrastructure of football stadiums.

The provision of stadiums with good facilities is a crucial ingredient of any strategy designed to encourage potential spectators to attend matches, and integral to making spectators feel safe, secure and welcome. New modern stadiums are the ideal and a longer-term solution, but there is widespread European experience available demonstrating that it is possible with relatively modest capital investment to refurbish old stadiums and make them safe and attractive to potential spectators. That experience also demonstrates that the provision of improved stadiums infrastructure and spectator facilities can and does have an impact on behaviour generally, while the installation of key safety measures like CCTV will also greatly assist the organiser and the police in identifying those who misbehave and in providing strong evidence of being adduced in court in support of the imposition of football banning orders.

High levels of frustration may be understandable but the need to overcome these obstacles is considered by the team to be a safety (and security) imperative. There is an urgent need to explore every possible source of possible funding in a creative manner (that is to think *outside the box*) as other countries have had to do in order to modernise their stadiums.

Recommendation 20: the Bulgarian authorities should examine in a creative manner all possible sources of public and private funding (or a mix thereof) to meet the cost of modernising (either through renovating existing or building new) stadiums hosting professional football matches played in Bulgaria. (status: important)

Minimum Stadium Safety Standards

The need to modernise stadiums and rectify shortcomings in the current physical infrastructure and associated crowd management arrangements, is a crucial component of the integrated approach. Moreover, it is equally important to ensure that full account is taken of European good practice when considering improvements to, and financial investment in, football stadiums.

There is a clear need, for example, to more directly link the physical infrastructure of stadiums with the safety management arrangements applied within the stadium and its environs. The two components are complementary and must be unified in a comprehensive stadium safety package if the potential risk to spectators is to be minimised and if spectators are made to feel safe, secure and welcome.

The national co-ordination committee should review the current arrangements and consider the merits of establishing a sub-committee with the BFU, the Regional Committee (Licensing Authority) and the Ministry of the Interior (Municipality) to develop stadium safety standards (covering physical infrastructure, technical equipment and, importantly, safety management arrangements), monitor application of these standards, and assess their effectiveness.

Such a development would not be achieved in quick time given the need to: establish the independent public body in law; make legal provision for empowering its role and functions; identify, train and equip a team of experts to undertake their designated functions; determine roles, responsibilities and operating arrangements, etc. Once established, the independent body should be well placed to monitor performance and provide expert instruction on the improvements necessary to the safety management arrangements in each stadium. If it is decided to pursue this option, it would be prudent to seek advice and assistance from UEFA and the Council of Europe.

It is for each country to determine how it prescribes minimum national stadium safety standards, and a range of options are practiced across Europe. However, to ensure that each stadium is in compliance with national standards, some countries enshrine the standards in a generic stadium safety certificate (as detailed in the INTERPOL Guidance: [INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf](#))

Stadium safety standards should be consistent with T-S4 recommendation on this subject (See [Recommendation \(2021\)1](#), Annex A – Safety, Appendix 33, and [Annex D - Checklist](#), which provides a checklist of measures to be taken by the organisers of professional sports events and

by the public authorities). A wide range of additional sources of information on safety standards for sports stadiums is available, including UEFA and FIFA Safety Regulations and the UK Sports Grounds Safety Authority's Green Guide.

Alternately, the Bulgarian Standards БДС EN 13200-1 <https://bds-bg.org/en/project/show/bds:proj:100308>, 2019, Spectator facilities General characteristics for spectator viewing area; and прБДС EN 13200-10:2024 Spectator facilities - Part 10: Calculating of safe capacity in case of emergency <https://bds-bg.org/en/project/show/bds:proj:122342>.

Recommendation 21: the Bulgarian authorities should take full account of European good practice in commissioning the preparation of model guidance for modernising football stadiums, incorporating minimum: (i) physical standards and facilities; and (ii) crowd management arrangements. (status: important)

Stadium Safety Certification and Licensing

Compliance

This is a crucial requirement. Irrespective of the age or physical infrastructure of a stadium, effective safety management arrangements should still be able to provide a safe environment for all visitors. The importance of the stadium safety certificate is that it provides a blueprint for how this can be achieved. On the basis of discussions and observations during the visit, the team is not convinced that this core objective is being achieved.

The national co-ordination committee should therefore review the current stadium safety certification arrangements and consider the need for, and merits of, refining the law to require all football stadiums hosting professional football matches in Bulgaria to be in possession of a stadium safety certificate issued by the proposed independent public body (“Stadium Safety Authority”).

Effective stadium safety certification should be a pre-requisite to a stadium receiving a license to host a professional football match. The key issue is possession of a safety certificate, not whether the safety certificate is sought by and issued to a stadium owner, stadium operator, resident club or event organiser.

Again, enacting this important development would require the personnel of the proposed independent public body to be empowered in law, equipped, trained and assessed as being competent to undertake their stadium safety certificate functions effectively.

- **Observation**

The current stadium safety certification arrangements in Bulgaria appear far from adequate. In accordance with Article 7b of the Law on Protection of Public Order during Sports Events, each stadium must be thoroughly inspected by the public authorities and issued with a safety

certificate. In practice, this means that the "certificate" must be issued by the Regional Governor on the basis of advice received from a regional committee and other technical experts.

The decision by the Regional Governor to exceptionally grant an annual safety certificate to top tier football clubs, even though the stadiums were not compliant with either legal or BFU regulations, was understandable but still a matter of some concern for the team. Furthermore, during the visit, it became apparent that not all clubs are already taking the necessary steps to prepare for the new legislation (CCTV, access control and command room). The documentation and explanations provided during both visits strongly suggest that the Bulgarian authorities, in the form of the national committee, should review the current safety certification arrangements, taking into account European good practice.

Stadium safety certification and licensing can be a complex issue subject, on occasions, to conflicting interests. European good practice evidence that the agencies who issue stadium licences and safety certificates need to be independent of the organiser and the government. It is recommended, therefore, that the national committee should seek to introduce in law, a more comprehensive and sophisticated stadium licensing and inspection process and establish a designated (independent) national body to provide a source of expertise on stadiums safety matters and to issue stadiums safety licences. The proposed body could also undertake inspections and audits as part of its functions.

At a local level, multi-agency local safety certification groups need to be established to oversee local compliance with model safety certificates incorporating minimum national standards. The importance of these local groups is that they will involve participation of all the relevant agencies tasked to make stadiums safe on match days, who can meet on a regular basis to discuss the safety and security arrangements for individual matches and take account of recent or emerging risks and experiences.

There is a direct link between stadium safety certification and the introduction of minimum safety standards (see above). Once these standards have been established then the safety certificate and inspection process should be based on whether the stadium is in compliance. Clearly, interim arrangements will need to be put in place given the current need to upgrade all Bulgarian football stadiums but safety should not be compromised, even if this means that only certain areas of a stadium can be used.

Recommendation 22: The national co-ordination committee should make provision for the (proposed) independent public "stadium safety authority" to issue stadium safety certificates and monitor compliance with its conditions. (status: important)

Recommendation 23: The Bulgarian authorities should review the current stadium safety certification and inspection arrangements, taking into account European good practice (as detailed in the INTERPOL Guidance [INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf](#)). (status: important)

In so doing consideration should be given to setting up an independent national stadium licensing body to oversee local safety certification arrangements and provide advice on stadiums infrastructure and safety management arrangements. Consideration should also be given to developing new stadium safety certification arrangements designed to ensure that stadium safety certificates:

1. are directly linked with minimum standards agreed at national level;
2. comprise model requirements to provide consistency in safety standards;
3. linked to periodic and audited expert inspection, undertaken by an independent national body responsible for issuing stadium licenses;
4. are issued by local multi agency safety certification groups tasked to ensure local compliance with minimum standards: and
5. provide accountability in respect of meeting the standards and ensure compliance with the conditions of stadiums licenses/certificates.

The team was unable to ascertain whether and, if so, what account the license inspection took of the safety management of the stadium, including matters such as the inexperience of the safety officer, in determining the safe capacity of the event. It would appear as though the stated capacity is based upon the holding capacity of the venue (i.e. the numbers of spectators that it can physically accommodate) and this is not reviewed in response to changes of circumstance or any assessment or observation from the relevant agencies.

Recommendation 24: The local suitability licensing authority (or such other body setting the maximum safe capacity of the stadium) should take account not merely of the number of spectators that it can physically hold, having regard to its design and condition, but also the numbers that can be safely managed, in other words, the quality of the safety management.

The UK Guide to Safety at Sports Grounds 6th Edition (Green Guide) is the international recognised standard for setting a safe capacity within a stadium and detailed design criteria (see: <https://sgsa.org.uk/physical-factors/calculating-safe-capacity/>).

Alternately, the Bulgarian Standards БДC EN 13200-1 (<https://bds-bg.org/en/project/show/bds:proj:100308>), 2019, Spectator facilities General characteristics for spectator viewing area; and prБДC EN 13200-10:2024 Spectator facilities - Part 10: Calculating of safe capacity in case of emergency (<https://bds-bg.org/en/project/show/bds:proj:122342>). (status: important)

Recommendation 25: The training of the Regional Committee (Licensing Authority) staff should evaluate the process to determine the safe capacity of the stadium and each sector, based on the evacuation capacity of each sector and the quality of the safety management of the stadium (see INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf). (status: important)

Stadium Technical Facilities and Control Rooms

The effectiveness of stadiums safety arrangements is largely dependent upon the capability of its control room to manage in-stadiums safety operations, especially in the event of emergency or incident scenarios. The control room should be an integrated workplace where all they key agencies are represented at an appropriate level to ensure an integrated and swift response to any incidents that may arise prior to or during a match.

Effective integrated safety management is best achieved in a supportive environment where all the key decision makers are co-located together with all the necessary information and resources to communicate and co-ordinate responses. The control room should be able to undertake three essential functions:

1. communicate effectively, both internally and with external stakeholders;
2. coordinate effective responses to incidents at the event; and
3. control all on site resources.

European good practice demonstrates that the control room should be staffed by stadiums safety management personnel, supported by external partner agencies such as the police, fire and ambulance services and specialist resources able to create a multi-agency task force in the event of an emergency situation.

Recommendation 26: The Bulgarian authorities should ensure that European good practices are taken into account in determining stadium control room operations. (status: important)

Good practice suggests that each control room should:

1. provide an integrated workplace where all they key agencies are represented at an appropriate level and work in accordance with agreed protocols;
2. be staffed by experienced competent personnel;
3. have vision of CCTV images to observe the entry points, spectator areas, internal and external circulation routes and places where there may be build-up of crowd density;
4. be able to override the venue public address system to broadcast safety and security announcements;
5. be able communicate directly with those spectators waiting to gain entry to the stadium;
6. be able to instruct the video board or electronic message board operators to display pre-prepared safety and security messages;
7. be able communicate with all radio users on a designated channel;
8. maintain a radio log to record radio communication regarding safety operations;
9. be staffed by trained CCTV operators working in accordance with a communication protocol agreed between the operators and the control and command team;
10. have access to a fire alarm repeater panel or computer display link; and
11. have access to a turnstile monitoring system providing visual readouts of spectator numbers in each sector of the stadium.

Recommendation 27: A detailed command and control structure should be documented to provide details on the practicalities of each party within each of the control rooms and their specific responsibility (see [T-S4 Recommendation \(2021\) 1, Annex A - Safety](#); also see the SGSA Guidance (<https://sgsa.org.uk/physical-factors/communications-and-control/control-room/> and <https://sgsa.org.uk/wp-content/uploads/2021/09/Annex-C-Control-points.pdf>). (status: important)

In most modern stadiums, a heavy reliance on technology, particularly around entry and e-ticketing at turnstiles, is common. As with all forms of technological dependence, a backup in the event of a systems failure can cause serious crowd safety issues to those outside awaiting entry to the stadium. The new e-ticket system needs careful planning and implementation with robust contingency plans for system failure.

Recommendation 28: The relevant bodies should ensure that the procedures based on technologies, like the ticketing and accreditation, should have a redundant system to ensure business continuity, so as to mitigate the impact of technical or human failures or cyberattacks. Namely, with regard to electronic entry systems, stadium management should develop a robust backup system for use in case of a systems failure. (status: essential)

- **Observations**

Another critical aspect of enhancing security within professional competitions is the implementation of Closed-Circuit Television (CCTV) systems adhering to a defined standard, which is now a requirement for all clubs and stadiums.

- **Comments**

These CCTV systems are equipped with high-resolution cameras, serving both as a deterrent and significantly augmenting the ability to identify individuals involved in illicit activities. By ensuring uniformity and high-quality footage across all venues, this standardisation not only improves surveillance capabilities but also fosters a safer and more secure environment for all stakeholders involved in professional sports competitions. Moreover, these systems facilitate convenient crowd management and enable minute-by-minute monitoring of operations, both inside and outside the stadium, enhancing overall operational efficiency and safety measures. In particular, the employment of PTZ (Pan-Tilt-Zoom) cameras, renowned for their high resolution and wide-angle recording capabilities, stands out, as they enable post-incident review by allowing operators to rewind the footage and zoom into specific areas with assurance that detailed images of that moment are captured.

Compliance

In order to demonstrate compliance, the national co-ordination group should commission an expert view on the efficacy of current stadiums CCTV and other technical facilities in order to

determine what improvements are necessary to meet stadium safety needs and evidence gathering purposes. A phased improvement programme should be introduced if the current facilities are considered to be of insufficient quality. Once established, the proposed independent "stadium safety authority" should incorporate new national standards in mandatory instructions and, thereafter, monitor progress on implementation and impact on stadium safety management arrangements.

Recommendation 29: The national co-ordination committee should commission an expert view on the efficacy of current stadiums CCTV and other technical facilities in order to determine what improvements are necessary to meet stadium safety needs and police evidence gathering purposes. A phased improvement programme should be introduced if the current facilities are considered to be of insufficient quality. (status: important)

Intent

5.4. The Parties shall encourage the relevant agencies to ensure that stadiums provide an inclusive and welcoming environment for all sections of society, including children, the elderly and those with disabilities, and incorporate, in particular, the provision of appropriate sanitary and refreshment facilities and good viewing conditions for all spectators.

Compliance

- **Observation**

Visits of the Vivacom Arena Georgi Asparuhov stadium and the Vasil Levski national stadium have showed a very low level of service and infrastructures, that are generally outdated and not in line with the current good hosting standards. This was confirmed by multiple interlocutors, from football governing bodies, public authorities and supporters' organisations, who confirmed that improvement of the football infrastructure was a key priority in the development of Bulgarian football.

Allowing a satisfying level of safety and service is key in attracting new audiences and retain the existing ones. The infrastructures visited didn't offer appropriate services in terms of access to toilets, food or drinkable water, which, according to Levski Sofia fan representative Nikola Bushnyakov, was a major limitation for parents to attend games with their children. This was confirmed during the match observed at the national stadium, with a crowd that consisted of an overwhelming majority of young men, with very few children, women or persons with disabilities. The state of the infrastructures and the poor level of service constitute a major barrier in attracting new audiences and diversifying the fanbases.

At the derby match that the team attended, it was observed that there was a very clear segregation strategy, with important buffers separating the two main groups of rival supporters. The ultra groups and hooligans represented the majority of spectators, which prevents families,

women, children, elderly people and persons with disabilities to come to the stadium. These were only relatively represented in the central and VIP tribunes.

However, it was unfortunately not possible to see this demographic diversity in other parts of the stadium, mainly due to inadequate infrastructure.

It was observed during the pre-match field inspection that sanitary and refreshment facilities were quite insufficient at the national stadium of Vasil Levski especially for the special needs of families, women, children, elderly people and persons with disabilities, which makes for them too hard to come to the stadium and enjoy the game.

The fan walks of both rival groups of supporters, where ultras and hooligans prevailed, were also clearly segregated in the public space, through an effective work of the police, and no clashes between these two groups were reported. However, the intensive use of different types of homemade pyrotechnics caused unrest in the other users of the public space and hindered the possibility for families and children to participate in these walks.

The national stadium, which in the mid-term will be replaced by a new one, doesn't have a sufficient and qualitative offer of refreshment areas and toilets, as well as sufficient physical conditions for persons with disabilities. The team observed only one spectator with wheelchair and he was watching the game on the athletics track, close to the place where players were warming up, with no protection from the rain and apparently with no accompanying person.

The team was informed by the members of the Parliamentary committee that the new law will establish, as a guiding principle, the right of families, children and youngsters to attend sports events in a safe, secure and welcoming manner, thus promoting inclusiveness.

In new stadiums, inclusiveness is a pre-condition for licensing, based on accessibility and service standards established by UEFA guidance.

The new CSKA stadium project presented by the club showed a focus on service and fan activities, through for example the decision to include a significant number of safe standing sections. This could serve as a blueprint for other future infrastructures in Bulgaria.

- **Comments**

The inadequate infrastructure of many stadiums throughout Bulgaria has been documented above.

As Bulgarian football is working on a series of new or renovated stadiums, it is paramount that these modern infrastructures integrate the needs and expectations of the fans in order to ensure a good level of services and to make these new stadiums attractive to both the traditionally male-dominated fan bases and new potential audiences – such as families.

Experience from other European countries show that the inclusion of fan representatives and local communities in the design and construction of new or renovated stadium increase the quality of the design, as well as the attractiveness and legitimacy of the infrastructure. On the opposite, building a stadium without taking into account the needs and expectations of the future users or the impacted communities can have a negative influence on stadium attendances and how the infrastructure is perceived by the general public.

In accordance with the above-mentioned purpose, it is advised that the model national legislative and regulatory framework on safety, security and service at football matches and other sports events clearly establishes that the sports venues should require:

- a. Appropriate sanitary and refreshment facilities along with good viewing arrangements for all spectators, including children, the elderly and disabled persons; and
- b. Signage arrangements which comply with national and international standards and good practice and meet the needs of persons with disabilities.

In other words, sport authorities and other relevant bodies, public or private, need to acknowledge and promote service principles, including paying proper attention to the special needs of families, women, children, elderly people and persons with disabilities when planning and managing sports events.

It is also stated in the [T-S4 Recommendation \(2022\) 2 on a model national legislative and regulatory framework](#) that the sports venues safety requirements including the emergency plan should comprise particular procedures for the disabled or vulnerable people and other target groups.

Recommendation 30: The Bulgarian authorities should ensure higher service standards at major sports venues (stadiums and arenas), namely in terms of inclusiveness, sanitary and refreshment facilities. (status: important)

Recommendation 31: The Bulgarian authorities should encourage the consultation of supporters' representatives and local communities and businesses in the design and construction of new/renovated stadiums. (status: important)

Recommendation 32: The Bulgarian authorities and the BFU should ensure that a satisfying level of services is integrated from the early stages of the stadium design, with a specific focus on toilets, food stalls or wheelchair user bays. (status: important)

Recommendation 33: The Bulgarian football authorities and clubs should ensure that a safe and welcoming environment is provided to a large public: families, women children, elderly, persons with disabilities, etc. This includes good accessibility, regular maintenance and cleaning of the stadium, clean and sufficient toilets, water and food at disposal, etc. (status: important)

Recommendation 34: The Bulgarian football authorities and clubs should follow [UEFA/AccessibALL](#) and [IPC accessibility standards](#), as well as the [T-S4 Recommendation \(2021\)1, Annex C – Service](#), on recommended good practices on “Inclusiveness and Combating Discrimination and Intolerance” and “Inclusiveness and Disabled Supporters”, and ensure that all existing sporting venues carry out an accessibility audit to enable development of an action plan for improvements to increase diversity and equality. (status: important)

Intent

- 5.5. The Parties shall ensure that stadiums’ operating arrangements are comprehensive; make provision for effective liaison with the police, emergency services and partner agencies; and incorporate clear policies and procedures on matters that might impact on crowd management and associated safety and security risks, in particular:*
- the use of pyrotechnics;*
 - any violent or other prohibited behaviour; and*
 - any racist or other discriminatory behaviour.*

The aim of Article 5.5 is to oblige States to ensure that stadium authorities, in consultation with public authorities and other stakeholders, develop effective arrangements for identifying, preventing and tackling established and/or emerging in-stadiums safety and security risks, notably in respect of supporter behaviour.

Compliance

- **Observation**

The team observed that the security (policing) element has the primacy inside the sports venue. A massive number of police officers were deployed for the derby match, many of them from riot units and, among these, a number of them were Police and Gendarmerie reserve units from other provinces.

There was a clear unbalance between the police and the stewarding resources inside the stadium. One of the reasons pointed out by the national authorities is that, in general, stewards are not respected by fans. Therefore, even if the law enables event organisers to choose between stewards and police, they often prefer hiring police officers, in particular when there are poor infrastructures, to prevent serious incidents from happening.

The team was informed that the police interact with stadium safety managers and officers before each match and analyse the risk assessment, in order to have the same approach. Moreover, private security officers, even if they only have general training for being private security officers, follow periodic training. Authorities estimate that there is a clear need for improving their training, namely by establishing a specific additional module for stewarding.

It was not clear for the team if there are “statements of intent” setting out the roles and responsibilities of namely the police and the safety management personnel.

The members of the Parliamentary committee informed the team that they wish to include in the new law provisions on the responsibilities of the event organiser and a clearer division of roles and responsibilities.

The team had opportunity to observe the behaviours of PFC CSKA and PFC Levski fans at the Bulgarian derby match on 2 March.

Fans of both teams walked to the stadium from different routes under police control and then entered the stadium from different gates so as not to encounter each other.

During this process, there was no offensive action, fighting or unrest between the fans of the two teams. However, the team also witnessed extensive use of pyrotechnics and explosives during the fan marches from their meeting point to the National Vasil Levski stadium and during the game. The pyrotechnical devices including smoke devices were used at the beginning of the match and when both teams scored. The use of flares and smoke devices in the section where the home team's fans were located became so intense at a moment that the referee had to stop the match for a while until the smoke cleared.

Some of the fans interviewed at the stadium explained that pyrotechnics are a part of the Bulgarian football culture. They claim that pyrotechnics create a better and livelier atmosphere and show their passion and support for their team.

However, what is clear is that pyrotechnics are fundamentally unsafe, even in the hands of those who claim otherwise. Their use is dangerous, not only to users but also to fellow supporters who can and do sustain serious injuries as a result of pyrotechnic use across the world.

Nonetheless, the degree of the safety risk is such that spectators should be prohibited from entering a stadium in possession of a pyrotechnical device, or a constituent part. They should also be prohibited from being in possession of, or using, such a device in a stadium.

- **Comments**

It is crucial that the new law sets a clear division of responsibilities between the police, the sports authorities and the event organiser. Currently, it is clear that there is not a balance between safety and security, with the police playing the major role inside the venue. For instance, the command-and-control room that the team visited at the national stadium only had the police. The two stadium safety officers representing the host club were standing in the athletics track, during all the match, even if they told the team that they could be reachable by the command-and-control room.

With regard to the roles and responsibilities of the different competent authorities inside the stadium and in the grey zone (between the public and private area, outside of the stadium), it is important to make sure that they are agreed upon and written, and, in particular, the transfer of responsibilities to the police in case of a public order or criminal incident, so they can be clearly understood by all parties.

Recommendation 35: The Bulgarian authorities should agree upon a system of “statements of intent”, setting out clearly the roles and responsibilities of the police and the safety management staff, as well as the arrangements for transferring overall responsibility to the police in case of a relevant incident. (status: essential)

5.5.a. *The use of pyrotechnics*

Intent

Article 5(5) of the Convention obliges each State to develop effective arrangements for identifying, preventing and tackling established and emerging in-stadiums safety and security risks and to develop such arrangements in consultation with public authorities and stakeholders. The issue of pyrotechnic use in stadiums is cited as a key issue covered by this Article.

Compliance

Bulgaria is not alone in experiencing significant problems associated with the use of pyrotechnics in and around stadiums. Confronting this issue will not be easy for any State. However, the findings of an independent scientific study of the health and safety risks associated with the use of all pyrotechnical devices in stadiums and vicinity (commissioned jointly by UEFA and FSE) are unequivocal: "There is no safe use of pyrotechnics in spectator areas or other crowded areas of football stadiums". The study also stressed that this risk is applied to all participants at a football event including safety and security personnel and players and officials.

- **Observation**

In Bulgaria, and despite the fact that the possession and use of pyrotechnics is forbidden by law, the massive use of pyrotechnics seems to be integral part of the ultra-culture. The fan walks of the rival groups of supporters to the derby match, as well as the way they behaved in the tribunes during the match were clear evidence of that context. Neither the police, nor the event organiser take effective proactive measures to prevent the fans from using the pyros, neither outside nor inside the venue. Many of those pyros are homemade, made of potassium chlorate, and their use for agricultural purposes was also forbidden several years ago, due to their toxicity for humans. The smoke these pyros produce is very intense: when they were

massively used inside the stadium, the smoke covered all the pitch for some minutes and the referee had to stop the match.

During the match, and on different occasions, pyros were launched into the pitch or onto the athletics track. In all cases, the firemen did not respect UEFA guidelines and manipulated these pyros while they were still burning. When a pyro was thrown into the pitch, a player picked it with his hands and dropped it out of the pitch, with the firemen following behind him without interfering.

However, the use of such devices is extremely dangerous and is prohibited, as stated under Bulgarian law. European experience demonstrates that even if searching regimes are rigorously pursued, ultra groups (who are the primary users of pyrotechnics) are often able to use a range of means for smuggling the devices into stadiums. This widespread experience demonstrates that the dual approach of prohibiting use and searching supporters will not prevent the use of pyrotechnics unless accompanied by a broader and sophisticated strategy.

This will be no easy task. The phenomenon is complex in character and will need to be confronted at many levels. Certainly, on the basis of European experience, to stand any chance of success, the Bulgarian strategy will need to be multi-faceted and bold in character, incorporating media and communication initiatives highlighting the dangers associated with pyros possibly involving graphic images and featuring supporters (preferably former users of pyrotechnics) opposed to the use of pyros in stadiums and the vicinity.

- **Comments**

It is important that all sports organisations apply the same policy and train their teams – safety officers, stewards, referees and players - on how to deal with pyrotechnics thrown into the pitch. It is also important that private security companies, firefighters, and other relevant stakeholders are aware and apply these safety procedures.

There is a clear need to deliver training to all these frontline officers, referees and athletes.

If pyrotechnic incidents do occur, then all persons – including referees, players and fire officers – should adopt the following UEFA procedure:

1. Move away from the pyrotechnic;
2. Leave it alone; and
3. Let it burn out, and only then should it be removed by trained firefighters or other trained staff, using safety and personal protection equipment.

As regards the supporters and other spectators, there is a need to have a preventative public health approach, including the launch of a public campaign on the risks associated to the use of pyrotechnics at sports events.

On the repressive side, whenever possible, the sanctions should be applied to the individual perpetrators and not to their group of supporters or their club, in particular when the new technologies will be in place and running effectively.

In the case of the pyros used inside the national stadium, the sanctions were imposed on the clubs and not on the individual perpetrators.

The new high-definition CCTV technologies implemented at major stadiums and arenas will enable the safety management and the police to better identify and prosecute the individual perpetrators in the stands and in the outer perimeters, thus avoiding anonymity and the feeling of impunity.

However, this reinforcement of preventive and deterring measures inside and around the sports venues usually produces a “displacement” effect, meaning that the use of pyrotechnics and other violent or disorderly behaviour may increase outside of venues, somewhere around the city, thus requiring more preventative action by municipal authorities and the police.

Recommendation 36: The Bulgarian authorities should develop an integrated, multi-faceted strategy designed to deter, prevent and punish the use of pyrotechnics in football stadiums. Strict measures should be taken to prevent prohibited substances and objects to stadiums:

- The number of checkpoints at stadium entrances and periphery areas could be increased; and
- Special training programs and/or awareness raising activities could be planned and developed for security forces in stadiums, especially on the use of pyrotechnics and other prohibited objects. (status: important)

Recommendation 37: The Bulgarian authorities should launch a public campaign to raise the awareness of the fans about the risks associated to the use of pyrotechnics at football matches and other sports events, in accordance with the recent scientific studies on this matter. This should include to limit the circulation of products used in home-made pyrotechnic devices

(see: https://www.uefa.com/MultimediaFiles/Download/uefaorg/Stadium&Security/02/48/11/68/2481168_DOWNLOAD.pdf). (status: important)

Recommendation 38: For major football and other sports events, all fire officers, police officers, stewards, private security, staff of the stadium authorities, referees, players and all other persons working at the stadium, especially the key decision makers, should be briefed and trained on the UEFA pyrotechnic policy and guidelines and the action required to be taken by them to ensure that the proper procedures are used and the proper action taken to ensure the safety of all persons if pyrotechnics incidents occur. (status: important)

5.5.b. *Any violent or other prohibited behaviour*

Compliance

- **Observations**

Bulgarian authorities acknowledge that hooliganism and sport-related violence are a priority that needs to be tackled, mainly in the major football clubs.

For instance, in the previous season there were several incidents with rockets being thrown against rival groups of supporters, in the opposite tribunes of the stadiums. In the security preparations for the derby match, the police and the organiser agreed with the main ultra groups that during the match they would not use rockets against each other.

The new law, which is currently being drafted by the Parliament, will focus on preventing and responding to serious incidents and disorder around major sports events.

- **Comments**

The team salutes the fact that there is a general consensus on the need to prevent and tackle hooliganism and sport-related violence, so that families can return to the stadiums, and the overall context can improve in terms of safety and security.

Recommendation 39: The Bulgarian authorities should consolidate effective policies to prevent, deter and respond to violent behaviour, namely through public campaigns, while progressing steadily towards a more balanced integration with the service pillar. (status: essential)

5.5.c. *Any racist or other discriminatory behaviour*

Compliance

- **Observation**

Background research ahead of the visit, including publicly available information such as press articles or UEFA disciplinary sanctions, showed a great level of far-right politisation within the Bulgarian fan culture, with multiple incidents of discriminatory nature such as chants or banners recorded over the last years only. This was confirmed during the observation of the Sofia derby match, during which multiple far right symbol was observed.

When asked about discriminatory incidents and the level of politisation of the fan culture, the interlocutors of the monitoring visit systemically downplayed the issue, going as far as claiming that there was no issue with discrimination in Bulgarian football. While it's difficult

to determine the reason for this, it certainly demonstrates a lack of interest for the matter and the absence of a proper monitoring and prevention policy.

The current legislation has provisions that punish hate speech and discrimination, but the scope will be wider in the new law.

During a fan walk, the team observed some neo-Nazi gestures made by a few hooligans. No other incidents related with racist or other discriminatory behaviour were observed.

It is important to highlight that Bulgarian authorities have launched prevention programmes to address discrimination at sports events. Last year, the Committee for Combating Discrimination held a programme on the prevention of hate speech at secondary schools that covered 2 000 teachers.

According to the Football Union, their regulations set fines for clubs in the event of racist or other discriminatory behaviour, but spectators who committed these offences are not directly fined. As a result, the Football Union estimates that there is a more tolerant attitude in stadiums in general.

- **Comments**

The Bulgarian fan culture is widely seen as one of the most radical in Europe in terms of racist, antisemitic, anti-LGBT+ behaviours. This is a well-documented phenomenon and the response from the Bulgarian authorities and the BFU seem largely insufficient. There seems to be no clear criteria in place as to what constitutes an incident of discriminatory nature inside a stadium, and no intention to develop a strategy to fight these behaviours.

Bulgarian authorities are conscious of the existence and potential increase of racist and discriminatory behaviour at sports events. That concern will soon lead to an improvement of the legal framework, which should balance preventative and repressive approaches.

Recommendation 40: The Bulgarian authorities should reinforce the legal framework and draft and implement a national strategy on combating hate speech, as well as adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour, namely benefiting from the campaign of the EU-CoE joint project on “Combating hate speech in sport”, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes (ex: FARE). (status: important)

Recommendation 41: The BFU should develop clear regulations and disciplinary sanctions in the fight against discriminatory behaviours. (status: important)

Recommendation 42: The relevant authorities should put measures in place to refuse entry into the venue for spectators who display or carry with them racist or other

discriminatory leaflets, symbols or banners and that the relevant authorities continue to apply zero tolerance in respect of any kind of discrimination inside the stadium and public spaces on the occasion of major sports events. (status: important)

Intent

- 5.6. *The Parties shall require the relevant agencies to ensure that all personnel, from the public or private sectors, involved in making football matches and other sports events safe, secure and welcoming are equipped and trained to fulfil their functions effectively and in an appropriate manner.*

Compliance

- **Observation**

Like other European countries, Bulgaria has been facing, namely since the aftermath of the COVID-19 pandemic period, difficulties in selecting and recruiting a sufficient number of qualified private security officers for sports events.

The team was informed that one of the reasons that explains the difficulties in recruiting these officers is the fact that most sports infrastructures are rather poor and, therefore, make working conditions more difficult.

Another reason is the fact that private security officers are not respected by the majority of fans. Moreover, the current law allows the organiser to choose police instead of private security companies to cover the safety operations inside the stadiums.

The fact that private security officers have low salaries, low qualifications, minimum training and work in poor infra-structures are obstacles to recruit skilled persons for this important job, avoiding an important turnover in this field.

The team was informed that private security officers for major sports events are provided by private security companies, that they are trained and qualified as private security officers but, so far, they did not receive specific training for working in the context of sports events (stewarding).

With regard to venue safety managers, it seems that they are recruited based on their experience as former police commanders or intelligence officers and that they did not receive specific training so far.

Furthermore, the team was informed that, so far, police and stewards do not receive common training and do not hold joint exercises, although they have a complementary role during match-days.

The provision of qualified safety managers and stewards should be complemented by the new technologies – namely because these technologies need to be operated by qualified people -, which will have a preventive effect and enable identifying the perpetrators and individualising the sanctions.

- **Comments**

Safety officers and stewards are an essential part not only of the stadium safety management structure, but also of the safety and service arrangements in the fan zones and other similar areas.

The police, safety managers and private security officers should receive common training and hold stadium joint exercises on a regular basis, to make more effective their complementary role during match-days.

The police should have a vested interest that the safety managers and private security officers are more qualified, better trained and equipped and that they hold common exercises, so that police can be more concentrated in their security missions, instead of complementing or overlapping with the work of the private security officers, as the team could observe during the derby match.

Stadium Safety Officers (known as Club Security Officer in Bulgaria)

European experience demonstrates that the role of stadium safety officers is integral to the development of integrated local in-stadiums safety arrangements.

Stadium safety officers (currently known as "club security officer" in Bulgaria) should play a pivotal role in all matters concerning stadiums safety and crowd management.

For this practice to be replicated in Bulgaria, it will be necessary to establish standards on safety officer competencies, status, training and authority.

It is recommended that the issue of a stadium safety certificate should be subject to the stadiums having a designated, and accredited as competent, stadium safety officer tasked with responsibility for all in-stadiums safety, security and service matters.

This will require clarification of the process for designating the training and accreditation arrangements for stadium safety officers. The content of the training will need to be linked to

the development of more comprehensive and effective stadium safety management arrangements.

A parallel initiative should be pursued in terms of seeking and determining the timing and other arrangements for the provision of expert UEFA joint training for stadium safety officers and police match commanders.

In addition, it will be necessary to identify the legal changes necessary and desirable to empower and inform the roles and responsibilities of stadium safety officers. Thereafter, the role of the national co-ordination committee would be to monitor and evaluate the impact of the training on the efficacy of stadium safety management arrangements

Recommendation 43: The national co-ordination committee should consider renaming Club Security Officers as club/stadium Safety Officers to reflect and emphasise their principal role and take full account of good practice in developing minimum standards on their competencies, status, training and authority. (status: important)

The following good practices should be taken into account:

1. safety officers should have prime responsibility for all stadiums safety issues, including stadium maintenance and crowd management on match days;
2. safety officers should be occupationally competent for the role once they have sufficient training, experience and knowledge, to be able to implement the functions detailed in a model job description;
3. in order to effectively discharge their responsibilities, safety officers should be given a detailed job description which clearly sets out the functions of the post;
4. safety officers should have the necessary character to be able to quickly assess and deal with developing situations in a calm manner and the ability to communicate clearly to their staff;
5. on event days, the safety officer must have the authority to make immediate decisions on spectator safety without having to refer to senior management, board members or event organisers;
6. no decision which could have implications for safety should be taken without the agreement of the safety officer;
7. the safety officer must be able, and be permitted, to commit sufficient time to all events to enable thorough preparation and planning to be undertaken;
8. the safety officer needs to plan or at least participate in regular testing and exercising all emergency procedures;
9. the specific responsibilities of the safety officers could include but are not limited to:
 - pre-event planning and risk assessments;
 - pre-event inspections;
 - developing safety management systems;
 - preparing, monitoring and reviewing safety documentation and safety management systems;

- contributing to the safe capacity assessments;
- recruiting and organising the training of sufficient stewards;
- interacting with external agencies including the local authority, the police and other emergency services;
- maintaining safety records;
- investigation and reporting of incidents and accidents;
- pre-event planning and risk assessments;
- pre-event inspections;
- developing safety management systems;
- preparing, monitoring and reviewing safety documentation and safety management systems;
- contributing to the safe capacity assessments;
- recruiting and organising the training of sufficient stewards;
- interacting with external agencies including the local authority, the police and other emergency services;
- maintaining safety records; and
- investigation and reporting of incidents and accidents.

Recommendation 44: The Club Safety Officer/representative should be provided with a detailed job description which clearly sets out the functions of their post. The [T-S4 Recommendation Rec\(2021\)1 \(Annex A - Safety\)](#) and its good practices may be used to compile a checklist of functions necessary for the role. The national co-ordination committee should set the minimum areas of competence to be demonstrated by such safety officers, supervisors and safety stewards, taking into account both the core functions of each group and the variety of roles that they may perform, having regard to the checklists in the T-S4 Recommendation on this subject (see [T-S4 Recommendation \(2021\) 1, Annex A – Safety -, Appendix 33](#), and [Annex D - Checklist](#)). (status: important)

Stewarding/Security Operations and Training

Different views were expressed by the various stakeholders at the meeting with the team about the role and competence of the “stewards/security”. Some were generally complimentary; others were highly critical. It was noticeable however that most appeared to regard the stewards, normally described as private security personnel, as primarily responsible for the prevention of misbehaviour, with rather less emphasis on spectator safety.

There was some disagreement by the various stakeholders over the extent to which the private security companies were sufficiently regulated. The perception was that the private security services were not equipped to ensure safety in its entirety.

The team considers that it is essential to specify clearly and in writing the respective responsibilities of the Police and the security companies, but also of the match commander, the safety officer and the head of stewards/security. It was not clear if the action plan covers this.

This should preferably be in the form of a management document (not a formal legal agreement) that covers their functions and powers both inside and outside the venue. Thus, if the stewarding companies are to be responsible for “security” inside the venue, this needs to be recorded in detail, along with their powers. The document should also identify who is to be responsible for spectator safety and what they may do.

The overall performance of the stewards/security and their visibility was adequate. It remains to be seen how they would react in case of an emergency. The acknowledged lack of training is an issue which will be addressed.

Recommendation 45: A document or security/stewarding plan should be developed for each event, which contains the respective roles, responsibilities and precedence of the police, safety officer, stewards, volunteers, private security companies along with the competence expected of each practitioner (see [T-S4 Recommendation \(2021\)1, Annex A – Safety](#)). (status: important)

Recommendation 46: The national co-ordination committee should identify and implement systems for ensuring the provision of adequate and appropriate training, at both the theoretical and practical level, for such safety officers, supervisors and safety stewards, and establish, document and monitor procedures for ensuring that those who have been trained are then assessed as being competent to perform their allocated tasks (see [T-S4 Recommendation \(2021\)1, Annex A - Safety, Appendix 33](#)). A national network should be established to enable stadium safety officers to share information along with sharing expertise and good practises (ESSMA, the European Stadium & Safety Management Association is the European network for this practice: <http://www.essma.eu/>). (status: desirable)

Recommendation 47: The Bulgarian authorities should equip and train police and stewards in an appropriate manner, namely in foreign languages. (status: important)

Recommendation 48: The event organiser should develop and set out a level of service and training expected of personnel supplied by the private security company. A contract to this effect, such as a service level agreement specifying the numbers and quality of safety staff, should be in place (see [T-S4 Recommendation \(2021\)1, Annex A - Safety](#)). (status: important)

Article 6 - Safety, Security and Service in Public Places

Intent

6.1. The Parties shall encourage all agencies and stakeholders involved in organising football matches and other sports events in public spaces, including the municipal authorities, police, local communities and businesses, supporter representatives, football clubs and national associations, to work together, notably in respect of:

- a. assessing risk and preparing appropriate preventative measures designed to minimise disruption and provide reassurances to the local community and businesses, in particular those located in the vicinity of where the event is taking place or public viewing areas;*

Compliance

- **Observations**

The police carry out risk assessments on a regular basis. Fan walks are discussed and planned in advance between the police, the organiser and the relevant supporter groups.

In the two fan-walks that the team observed, the police were effectively framing them, to reduce their impact on the traffic and the local community and businesses. The main disruption was due to the use of a massive number and diversity of pyrotechnic devices, producing much smoke and noise in the public space.

- **Comments**

When new infrastructures and new technologies will be in place, it is likely that more incidents will be displaced to the vicinity of the stadiums and to the city centres, this requiring stronger partnerships between municipal authorities, police, local communities and businesses, supporters' representatives, football clubs and national associations, aiming at mitigating this "displacement" effect.

Intent

6.1. b. creating a safe, secure and welcoming environment in public spaces that are designated for supporters to gather before and after the event, or locations in which supporters can be expected to frequent of their own volition, and along transit routes to and from the city and/or to and from the stadium.

Compliance

- **Observations**

For most spectators travelling to, or egressing from, a stadium or arena, in order to connect with a public transport hub, a car park or local amenities, their journey will involve passing through routes or areas that lie beyond the outer perimeter of the sports venue.

This external zone, which may consist of a network of routes and areas, or in some locations a single expanse of land, is referred to as Zone Ex.

Although the routes or areas that make up external areas (Zone Ex) do not, in most locations, fall within the jurisdiction of the sports venue management, they will either be part of the public realm or under private ownership, clearly, they are key to the safe and secure arrival and departure of spectators.

It is therefore vital that planning for the movement of people through Zone Ex involves the input of all relevant external organisations, such as the police, local authorities, highway agencies and, where applicable, the owners of private property.

Within such a multi-agency approach it is important to establish which organisation or agency has the lead responsibility for co-ordinating the management of Zone Ex on an event day, and for this role to be recorded in the Transport plan and Operations Manual and in the sports venue safety management structure.

Further details can be found in the UK Guide to Safety at Sports Grounds:

- <https://sgsa.org.uk/document/greenguide/>
- <https://sgsa.org.uk/physical-factors/zone-ex/>

Recommendation 49: The relevant authorities should take account of the good practice contained in the Recommendation Rec (2021) 1 of the Saint-Denis Committee in developing plans for organised and spontaneous fan areas. Appropriate safety and security preparations should be developed; effective crowd management and crowd control arrangements should be in place for fan meeting points and fan walks. (status: important)

Article 7 – Contingency and Emergency Planning

Intent

The Parties shall ensure that multi-agency contingency and emergency plans are developed, and that those plans are tested and refined in regular joint exercises. National legal, regulatory or administrative frameworks shall make clear which agency is responsible for initiating, supervising and certifying the exercises.

Compliance

• Observations

During the derby match, the team visited the command-and-control room, which only comprised the police and a CCTV system. It was not clear for the team if they have the good practice of organising joint simulation exercises and crisis management meetings and have a crisis communication strategy in place.

In the preparation for a match, the private security company drafts a safety plan and submits it to the club and the police, based on what was discussed in a previous joint meeting. This plan needs to be provided 3 days before the match.

• Comments

It is important that the safety management work with the police, emergency services and other competent local bodies, to develop comprehensive multi-agency contingency and emergency plans, in all the main stadiums and arenas, as well as in the fan zones – for instance, at international competitions -, and that they are tested and refined through joint exercises.

Furthermore, the team was informed that often there are technical problems with the turnstiles and CCTV systems in stadiums. Therefore, it is important to ensure business continuity, through redundant systems, in case the electronic systems fail. This is the case, for instance, with electronic ticketing and turnstiles in sports venues, for which there should be a plan B in case there is a power failure or a cyber-attack.

Moreover, the new law should establish the need for emergency and contingency plans at sports venues.

Recommendation 50: A detailed command and control structure should be documented to provide details of the role of each party within the safety management operation and their specific responsibilities. This is considered to be essential to develop a clear hierarchical structure for clarity of who is in overall command of the event. All key

decision makers should be located together in the same room (see [T-S4 Recommendation \(2021\)1, Annex A - Safety](#)). (status: important)

Recommendation 51: The safety management should work with the police, emergency services and other competent local bodies, to develop comprehensive multi-agency contingency and emergency plans, in the sports venues and other relevant premises, and ensure that they are tested and refined in multi-agency table-top exercises. (status: essential)

Recommendation 52: Once developed, the contingency plans in each stadium should be tested in multi-agency table-top exercises designed to identify any gaps in the contingency arrangements. Such exercises should include all parties involved in the delivery of the event and incorporate a selection of differing scenarios which could occur either before, during or after a match. (status: essential)

Recommendation 53: The relevant bodies should ensure that the procedures based on technologies, like ticketing and accreditation, should have a redundant system to ensure business continuity, so as mitigate the impact of technical failures of cyberattacks. Namely, regarding electronic entry systems, stadium management should develop a robust backup system for use in case of a systems failure. (status: essential)

Recommendation 54: The relevant authorities should:

- (i) review and determine the appropriate pre-entry searching regime to be applied during the matches and the measures required to mitigate entry delays (e.g., effective signage en-route to the stadiums, explanatory communications to visiting supporters, pre-match entertainment, etc.);
- (ii) consider the response to be adopted should delays on entry generate safety risks;
- (iii) once the arrangements have been reviewed, the outcome should feature in stadium contingency plans designating responsibility for determining whether or not to weaken security checks in the event of an emerging safety scenario; and
- (iv) as with other contingency plans, the arrangements should be subject to a multi-agency table-top exercise. (status: important).

Article 8 - Engagement with Supporters and Local Communities

Intent

8.1. The Parties shall encourage all agencies to develop and pursue a policy of proactive and regular communication with key stakeholders, including supporter representatives and local communities, based on the principle of dialogue, and with the aim of generating a partnership ethos and positive co-operation as well as identifying solutions to potential problems.

The aim of Article 8 is to highlight the importance of encouraging all national and local agencies engaged in football-related planning and operations to communicate effectively with supporters, resident communities in host cities and territories, and other stakeholders.

Compliance

• Observations

In the meeting with the representative of PFC Levski Sofia supporters, Mr. Nikola Bushnyakov, it was stated that the Bulgarian police have strong communication with the teams and fan groups, and that thanks to this communication an effective coordination can be provided especially before the matches, but it is also mentioned by Mr. Bushnyakov that it is not the case for the BFU, because this organisation does not have a constructive communication method with the teams and especially the fan groups, which apparently cause the fan groups to lose their trust in the BFU management.

This situation was confirmed by the club managers and fans that the team had the opportunity to talk during the derby match. It was stated that there had been protest marches against the BFU in the recent past resulting in the resignation of the BFU former president.

From a fan dialogue perspective, one of the key findings of the visit is that there is currently no structured dialogue between clubs and supporter's organisations. The same applies to the BFU. Most match-day arrangements are organised through the Bulgarian police, who, according to Nikola Bushnyakov, is a trusted interlocutor – especially in comparison to football clubs and governing bodies.

The BFU seem to have limited understanding about the role of the SLO. This is reflected in both the profile of its current SLO coordinator, as well as the standards that are applied across the League. As a result, the number of SLOs that meet the current standards as outlined in [T-S4 Recommendation \(2021\)1](#), [Annex C - Service](#) and [UEFA's practical guide to supporter liaison \(2021\)](#) is very limited, and the team was not able to meet or observe the work of an SLO that meets those criteria.

As club level, it appears that most clubs employ an SLO in order to fulfil the BFU's licencing requirements. This is at least the case of Levski Sofia and CSKA Sofia, which was confirmed during the visit, as the team had the opportunity to interview both SLOs. But the profile of these professionals was in contradiction with the general principles and guidelines for the role, as both had a security background, and at least one was a former police officer. None of them took part in any dedicated training and demonstrated limited understanding of the role.

The same applies to the BFU, which appointed an SLO coordinator with no expertise in fan dialogue, as he is a former professional player. During the visit, he showed little understanding for the role and his primary focus seem to have been related to safety and security. This was confirmed during the observation of the Sofia derby, during which both the BFU SLO coordinator and CSKA's SLO were visible pitch-side during most of the game. Before and after the game, they were both observed at the VIP entrance. Their work seems to have been focused on the safety of the players and VIPs.

When asked about their strategy to develop the role of the SLO, representatives from the BFU explained that there was little awareness about the role in Bulgaria, both at club and supporters' groups level – this was later contradicted by Levski Sofia fan representative who seem to have a good knowledge about the role. BFU representatives also confirmed that a number of SLOs were only appointed in order to fulfil the licensing requirements and that most of them primarily performed safety-related tasks.

On the other hand, the visit confirmed the absence of a representative organisation for Bulgarian football fans and their incapacity to play a role in pushing for the development of a meaningful and structured fan dialogue.

Before the monitoring visit, coordination meetings already existed or were held, aiming at ensuring that all relevant stakeholders work together in different stages, from planning to delivery. However, it is recommended that supporter representatives have the possibility to be part of these bodies or be heard by them, as part of a balanced multiagency integrated approach.

Different initiatives aimed at ensuring effective dialogue and communication should be envisaged by the Bulgarian sports authorities, like the establishment of supporter liaison officers (SLO) and [disability access officers \(DAO\)](#), as established by UEFA regulations and guidance.

There is no umbrella organisation of supporters' groups in Bulgaria. The BFU started this process, by holding the first meeting with 10 clubs one week before the monitoring visit. However, supporters should set up a solid umbrella organisation and define a strategy that enables them to resolve their differences, namely building upon existing experience (for example through the FSE network).

Moreover, currently, there are no regular communication channels between some main football clubs and supporters' organisations. The supporters' representative with which the team met mentioned that currently they communicate better with the police than with the club.

At least one club already connects with supporters through an app for fans, which provides news, ticketing and security and safety information. This good practice of communicating with fans through social media and apps should be used as good practice by the BFU and the clubs.

- **Comments**

Bulgarian football appeared to have developed its own understanding of the role of the SLO, which consist in appointing a security officer dedicated to the dialogue with supporters. This approach doesn't meet the Council of Europe and UEFA's minimum standards but is nevertheless deeply rooted into the country's football governance structure. In order to address this, it is necessary to train the top management of the BFU and Bulgarian football clubs, so that they can develop a better understanding of the role and its long-term benefits. This is a necessary preamble to the development of an SLO strategy and associated training.

In the absence of a national supporter's organisation, Bulgarian authorities and the BFU should explore other avenues allowing to consult fan representatives and ultimately involve them in the governance of the Bulgarian football.

Supporters' representatives and local communities and businesses should be included in the national, regional and local coordination and cooperation instances, at least at some stage, to give them a sense of belonging and co-accountability throughout the different stages of the planning and organisation of sports events.

Notably, local communities and businesses, in particular those in the vicinity of stadiums, should be consulted in the host cities' security and mobility plans decision-making process.

Public and sports authorities need to further invest in creating channels of communication with supporter groups.

The supporter organisations should be included in the consultation process of the draft law currently being led by the Parliament.

Recommendation 55: The relevant public and BFU should improve dialogue and communication with supporters, by developing and implementing supporter communication strategies, taking full account of established European good practices as set out in the [T-S4 Recommendation \(2021\) 1, Annex C -Service](#). (status: important)

Recommendation 56: The relevant authorities should ensure that the needs of supporters and local communities and businesses are taken into account from the planning to the

delivery of sports events, namely by integrating their representatives in the national and local co-ordination committees. (status: important)

Recommendation 57: The legal framework should establish the need for the top divisions' clubs to appoint supporter liaison officers (SLOs) and disability access officers (DAOs) (see [T-S4 Recommendation \(2021\)1, Annex C - Service](#), and [2021 UEFA and Practical Guide to Supporter Liaison Officer](#)). (status: important)

Recommendation 58: The BFU should work with UEFA and Football Supporters Europe in the development of the role and the training of the SLOs, including via the organisation of an edition of UEFA Academy's SLO training in Bulgaria. (status: important)

Recommendation 59: In the absence of a national supporters organisation, and the absence of a structured dialogue policy at the BFU, Bulgarian authorities should consider the creation of a national consultative platform on supporters-related matters, bringing together all stakeholders, in order to foster a culture of dialogue, cooperation and mutual understanding between all parties. (status: important)

Community Engagement

European experience demonstrates the importance of developing and implementing a range of social and preventative projects designed to lure young supporters away from negative fan behaviour, not least through promoting a culture of tolerance and respect for others irrespective of team supported and other manifestations of diversity.

Similarly, European experience evidence that the participation of professional football clubs and national federations in a range of community-based social, crime prevention, educational and other projects can assist in developing closer links between the clubs and the wider community. Such projects not only promote a very positive public image of the club but can also add value to the delivery of the project, for example, by using club facilities to encourage disaffected or alienated young people to participate in educational and other initiatives. Moreover, and importantly, community engagement can help encourage a wider, cross-section of people to attend football events, particularly if such initiatives are accompanied by the kind of high-profile improvements to stadium facilities observed by the team during the visit.

Recommendation 60: The national co-ordination group should encourage all stakeholders to consider the scope for developing preventative, social and educational projects connected with football events at both national and local level, whenever possible using players as role models. In particular, activities aimed at children and junior supporters should incorporate the promotion of values such as respect, tolerance, anti-violence and non-discrimination (see [T-S4 Recommendation \(2021\)1, Annex C - Service](#)). (status: important)

Intent

8.2. The Parties shall encourage all public and private agencies and other stakeholders, including local communities and supporter representatives, to initiate or participate in multi-agency social, educational, crime-prevention and other community projects designed to foster mutual respect and understanding, especially among supporters, sports clubs and associations as well as agencies responsible for safety and security.

Compliance

• Observations

Prevention is a priority of the Ministries of Interior and Sports and the BFU. There are already several interesting initiatives in place, in the field of social-educational prevention. A working group was established involving two clubs, their fans and officials to prevent hooliganism at sports events. One of the examples is the campaign “No to violence” addressed to children. There is a plan to also involve parents in this campaign. It will involve sports celebrities and football fans as well. Other projects are being implemented with the aim of promoting positive fan culture.

Moreover, two national programmes on youth are being implemented, on the prevention of violence, dependencies and misbehaviour. Around 200 NGOs were financed in the youth area, last year.

The Football Union adopted a Social Responsibility Strategy (2023-2027), which includes, within its four strategic pillars, the following: Equality and inclusion; Health and wellbeing; and Child and Youth Protection (see document in Appendix D).

• Comments

The Bulgarian authorities should strive to strengthen the service pillar, namely through improving dialogue and communication with supporters and the local communities and implementing more widespread social-educational projects aiming at educating the new generation of supporters.

Recommendation 61: The law in preparation should integrate or reinforce the service element and ensure a balance between preventative and repressive measures. (status: important)

Recommendation 62: The national authorities should work together with all partner agencies in order to enable a large diversity of people at the stadium, including women, children, persons with disabilities, etc. (status: important)

Recommendation 63: The sports authorities should be encouraged to develop relations with all categories of supporters, to encourage inclusion for the majority in a transparent and constructive way (see T-S4 Recommendation (2021)1, Annex C - Service). (status: important)

Article 9 - Police Strategies and Operations

Intent

9.1. The Parties shall ensure that policing strategies are developed, regularly evaluated and refined in the light of national and international experience and good practices, and are consistent with the wider, integrated approach to safety, security and service.

Compliance

• Observations

Among the responsibilities of NFIP Bulgaria is the training personnel within the country. Also, the personnel of NFIP attend training at European and International level (CEPOL, Interpol and Council of Europe).

The Police Academy organises trainings for police officers, private security officers and sport organisations. However, the Bulgarian Police welcomes further training activities, namely with European partners.

Based on the observations of the derby match, the team estimates that police strategies and tactics should be evaluated and refined, in order to, based on a dynamic risk assessment, decrease the number of police officers, balancing the number of riot units with other police units inside the stadium and revising the massive deployment of a significant number of riot police units surrounding the whole pitch some minutes before the end of the match.

• Comments

In the framework of reaching a better balance between safety and security, where private security should play a more effective role in safety, the Bulgarian police should consider revising their strategies and tactics, namely by adopting a graded deployment, with protective equipment used only where necessary.

The police should further invest in training of police officers and on updating their tactics doctrine, including regular participation in CEPOL courses on policing of major sports events and international police cooperation.

The police should also consider delivering specific training for match commanders, spotters and football intelligence officers. More specifically, a national network of spotters should be set up and trained based on European good practices.

Recommendation 64: In accordance with European good practice, policing tactics, profile and uniform should be determined on the basis of: ongoing dynamic risk analyses; graded deployment, with protective equipment used only where necessary; and early targeted and proportionate interventions to prevent the escalation of risk. (status: essential)

Recommendation 65: The police should ensure regular specialised training for match commanders, spotters and football intelligence officers, in accordance with European good practice, and envisage common training and exercises with safety personnel (status: important)

9.2. The Parties shall ensure that policing strategies take account of good practices including, in particular: intelligence gathering, continuous risk assessment, risk-based deployment, proportionate intervention to prevent the escalation of risk or disorder, effective dialogue with supporters and the wider community, and evidence gathering of criminal activity as well as the sharing of such evidence with the competent authorities responsible for prosecution.

Compliance

• Observations

A dynamic risk assessment is carried out by NFIP Bulgaria before football matches. It sets out a model of application covering dynamic risk and graded tactical police deployment throughout the period of the sports event.

• Comments

Public and sports authorities, as well as supporters' representatives, acknowledge that there is a need to improve dialogue and communication between police and the supporters' groups, namely through the SLO and DAO figures that should be established by law and consolidated in the future by the Bulgarian sports authorities.

Recommendation 66: Police units to be deployed should be encouraged to proactively interact with and adopt a welcoming and friendly manner towards supporters. (status: important)

Recommendation 67: Police forces and other local agencies should commit to opening communication channels with SLOs and DAOs – when they are established - and supporters, in line with the guidance set out in the [T-S4 Recommendation \(2021\) 1, Annex C -Service, Appendix M](#), and the [EU Handbook on Police Liaison with Supporters \(12792/16\)](#). (status: important)

Recommendation 68: Supporter feedback should be considered in the risk assessment process before each match (status: important)

Recommendation 69: The Bulgarian authorities should update and maintain the current system of peer review of football policing operations in order to identify more best practices and learning points. (status: important)

Recommendation 70: The Bulgarian police authorities should continue the development of intelligence gathering and dynamic risk assessment systems in order to adopt a risk-based deployment of forces. (status: essential)

Recommendation 71: The Ministry of Interior should ensure that the Bulgarian National Football Information Point (NFIP) is resourced and equipped to undertake effectively first of all of the roles and tasks set out in article 11, paragraph 2 of the Convention and secondly play a key role in delivering the proposed comprehensive exclusion strategy. (status: important)

Intent

9.3. The Parties shall ensure that the police work in partnership with organisers, supporters, local communities and other stakeholders in making football matches and other sports events safe, secure and welcoming for all concerned.

Compliance

• Observations

Police liaison with supporters is of paramount importance, and extensive European experience at a number of major football tournaments over the past decade has shown that encouraging police personnel to adopt a welcoming and friendly approach to supporters can be an effective policing tactic. Adopting such a policy can be challenging and frustrating for staff, especially if it is not routine and they have to deal with a diverse range of visiting supporters from different cultures and speaking different languages.

Recommendation 72: Police units deployed at sports events should be encouraged to interact proactively with supporters and to adopt a welcoming and friendly but firm attitude towards them. (status: important).

Article 10 - Prevention and Sanctioning of Offending Behaviour

Intent

- 10.1. *The Parties shall take all possible measures to reduce the risk of individuals or groups participating in or organising incidents of violence or disorder.*
- 10.2. *The Parties shall, in accordance with national and international law, ensure that effective exclusion arrangements, appropriate to the character and location of risk, are in place to deter and prevent incidents of violence or disorder.*
- 10.3. *The Parties shall, in accordance with national and international law, co-operate in seeking to ensure that individuals committing offences abroad receive appropriate sanctions, either in the country where the offence is committed or in their country of residence or citizenship.*
- 10.4. *Where appropriate, and in accordance with national and international law, the Parties shall consider empowering the judicial or administrative authorities responsible to impose sanctions on individuals who have caused or contributed to incidents of football-related violence and/or disorder, with the possibility of imposing restrictions on travel to football events held in another country.*

Compliance

The aim of Article 10 is to oblige all States to review existing arrangements for preventing and sanctioning persons who act in a violent or other unacceptable manner in connection with football events at home and abroad, notably, though not exclusively, through consideration of how to ensure that individuals committing offences receive appropriate and effective sanctions excluding them (temporarily) from the football experience.

• Observations

As said above, the Bulgarian authorities set as one of their priorities the fight against sport-related violence and hooliganism.

Sanctions like the ones against the use of pyrotechnics or racist or discriminatory behaviour are applied by the BFU against the clubs and not against the individual offenders. This generates a sense of anonymity and impunity that should be avoided. It was the case of the [sanction applied by the Football Union against Lokomotiv Plovdiv](#), some days before the monitoring visit, of playing four matches behind closed doors.

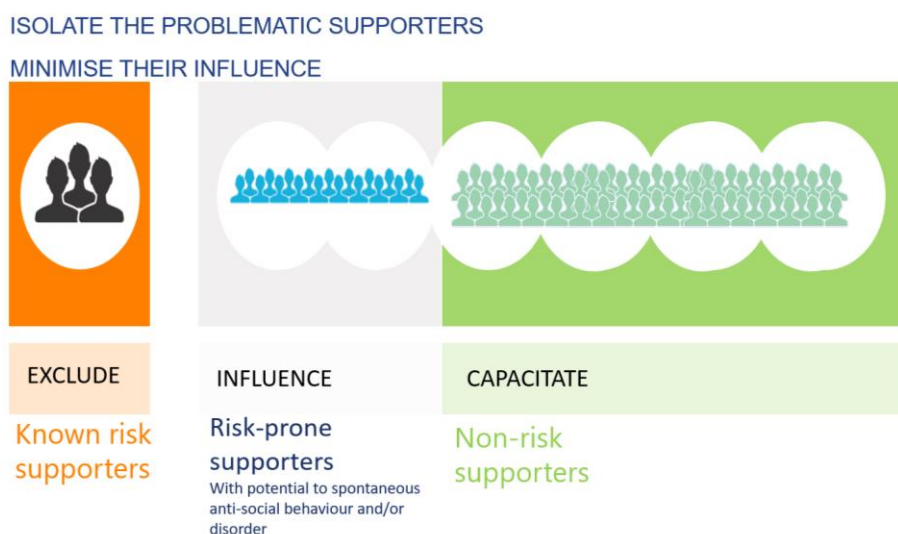
Moreover, the ticketing system is still not nominative and thus people cannot be controlled or identified through tickets. The e-tickets and turnstiles are not mandatory for the moment; only the CCTV system is mandatory for all top league stadiums.

The banning orders cover football and other sports, as well as travelling abroad to attend sports events.

The team was told that, for the time being, as the ID of the person is not requested when buying a ticket, people can enter the stadium without a ticket and/or with a ban. Moreover, due to this vulnerability, there may be more people in the stadium than the number of tickets sold.

The exclusion arrangements need to be improved, and the drafting of a new law is an opportunity.

A balanced and sustainable national strategy to prevent sport-related violence should take into account the fact that there are three categories of supporters and there is a need for public and private authorities to address them with different tools: firstly, the vast majority of supporters are non-risk and it is important to empower them, in order to reinforce their positive influence on the other supporters; secondly, the risk-prone supporters are a minority that need to be influenced to become non-risk ones; and, thirdly, the tiny minority are known risk supporters, whose influence should be minimised, and they need to be isolated and excluded from sports events (see image below):



• Comments

The national co-ordination committee to be established by the new law should improve the exclusion strategies, with a view to introducing a more effective banning orders system, taking advantage of the CCTV in all stadiums of the top league, and possibly the future implementation of the digital ticketing system, as detailed in [Annex B \(Security\) of the T-S4 Recommendation \(2021\)](#)¹.

Moreover, the team encourages the Bulgarian authorities to create a network of sport prosecutors and magistrates, to raise awareness of sport-related violence and criminality and be part of the [MARS international network of prosecutors and magistrates responsible for sport](#), recently created by the Council of Europe.

Recommendation 73: The national co-ordination committee to be established should improve the exclusion strategies, with a view to introducing a more effective banning orders system, namely taking advantage of the CCTV system, as detailed in [Annex B \(Security\) of the T-S4 Recommendation \(2021\)](#). (status: important)

Recommendation 74: The Bulgarian authorities are encouraged to create a network of prosecutors and magistrates responsible for sport, to raise awareness of sport-related violence and criminality and be part of the [international network of magistrates and prosecutors \(MARS\)](#), of the Council of Europe. (status: important).

Recommendation 75: The Bulgarian authorities should further invest in refining the actual exclusion system, which ensures that the troublemakers are not able to attend sporting events. The issued banning orders should be collected by a single central body or implemented in a single database, based on clear rules applicable to all sports, national and international, for use by all interested parties. (status: essential)

Recommendation 76: The relevant authorities should ensure the development of a new digital ticketing system which will be connected to a centralised register of banning orders and that police - notably the NFIP - and other relevant public authorities have access to this register on a permanent basis, to enforce the bans effectively. (status: essential)

Recommendation 77: The types of criminal offences covering the organisation and conduct of sports competitions and the behaviour of spectators and participants of these competitions within sports facilities and in adjacent areas should be included in national legislation. (status: important).

Recommendation 78: The Bulgarian authorities should consolidate effective policies to prevent, deter and respond to violent behaviour. Administrative or criminal sanctions should be imposed swiftly in accordance with the procedure set forth in national legislation against those who violate public order and cause damage to property and/or third parties, and implemented with zero tolerance. (status: important)

Article 11 - International Co-operation

Intent

11.1. The Parties shall co-operate closely on all matters covered by this Convention and related matters, in order to maximise collaboration in respect of international events, share experiences and participate in the development of good practices. (...)

Compliance

• Observations

The Bulgarian National Football Information Point (NFIP) is part of the NFIP network that carries out its tasks in accordance with the provisions of the [EU Council Decision 2002/348/JHA of 25 April 2002](#) concerning security in connection with football matches with an international dimension. It is established as part of the General Directorate “National Police” to coordinate actions related to sports security and operates under European and national legislation, with its activities defined by the Protection of Public Order During Sports Events Act.

The functions include:

- Assisting authorities and individuals organising sports events;
- Ensuring public order and the security of sports facilities;
- Conducting risk analyses and preparing relevant reports; and
- Collaborating with international bodies to combat anti-social behaviour at sports events.

For international sports events, the centre coordinates international police cooperation, exchanging information, including personal data, about individuals posing risks at sports events. It provides relevant details about Bulgarian nationals under sanctions or restrictive measures at least five days before the event.

The additional responsibilities of Bulgarian NFIP are the following:

- Issuing directive letters and informational documents regarding fan travel;
- Collecting and systematising information about international events involving Bulgarian citizens, such as demonstrations and parades;
- Analysing issues and deficiencies related to the enforcement of administrative measures under the Protection of Public Order During Sports Events Act;

- Training personnel within the country;
- Recommending the delegation of staff to high-risk football matches to observe and apply best practices;
- Collaborating with institutions and international organisations such as the BFU, UEFA, FIFA, and NFIPs;
- Initiating operational information-sharing to assess risks for upcoming sports events; and
- Organising statistical records on incidents, violations, and imposed sanctions.

The centre actively cooperates with the Ministry of Youth and Sports (MYS), sports federations, professional clubs, private security firms, local authorities, UEFA, and fan organisations. It also maintains operational contacts with Europol, Interpol, and third parties for real-time updates and information-sharing.

The team highlights the fact that the composition of the Bulgarian delegation to the Saint-Denis Committee is a good practice to be followed by other States Parties to the Convention, both with regard to its high-level and multiagency composition. This highly facilitates the cooperation between the Committee and the Bulgarian authorities and the more effective implementation of the Convention at national level.

• Comments

The Bulgarian authorities should maintain regular and long-term close co-operation with the Saint-Denis Committee in respect of international events, share experiences and participate in the development of good practices, in particular on preventative, educational and informative projects and the establishment of partnerships with all agencies involved in the delivery of national and local initiatives, focused on or driven by the local community and supporters.

The NFIP should be the body in charge of collecting the list of banned people and should play an active role in delivering the national exclusion strategy.

Taking into consideration the responsibilities of Bulgarian NFIP, it should be noticed that the resources allocated to the Bulgarian NFIP (5 police officers – 1 head of unit and 4 inspectors + 1 technical assistant, who also have other duties) are not sufficient.

Recommendation 79: The Bulgarian authorities should ensure that all police commanders and their personnel engaged in the preparations for, and operations during major sports events keep receiving appropriate and specialist training in European policing football good practices. (status: important)

Recommendation 80: The Bulgarian National Football Information Point (NFIP) should be regularly resourced, trained and equipped, to effectively undertake its roles and

responsibilities. The NFIP should be regularly informed of the list of banning orders. (status: essential)

Intent

- 11.2. *The Parties shall, without prejudice to existing national provisions, in particular the allocation of powers among the different services and authorities, set up or designate a national football information point within the police force (NFIP). The NFIP shall:*
- a. act as the direct and single contact point for exchanging general (strategic, operational and tactical) information in connection with a football match with an international dimension;*
 - b. exchange personal data in accordance with the applicable domestic and international rules;*
 - c. facilitate, co-ordinate or organise the implementation of international police co-operation in connection with football matches with an international dimension;*
 - d. be capable of fulfilling efficiently and promptly the tasks assigned to it.*

Compliance

- **Observations**

See observations above.

- **Comments**

The Bulgarian National Football Information Point (NFIP) should be regularly resourced, trained and equipped, to effectively undertake its roles and responsibilities, as set out in Article 11.2 of the Convention.

Recommendation 81: The Bulgarian police authorities should continue to invest in the development of the national network of police spotters and in their training. (status: important)

Recommendation 82: The Bulgarian National Football Information Point (NFIP) should organise annual meetings of its national network of spotters, mainly after the end of the football season, in order to address emerging challenges and points for attention. (status: important)

Recommendation 83: The Bulgarian National Football Information Point (NFIP) should work closely with the other police departments responsible for organised crime in order

to prepare evidence packages for the prosecution of football troublemakers. (status: important)

Intent

11.3. The Parties shall further ensure that the NFIP provides a national source of expertise regarding football policing operations, supporter dynamics and associated safety and security risks.

Compliance

The Bulgarian NFIP has 5 active positions, staffed by officers who are not exclusively responsible for sports policing and international police cooperation in relation to sports events.

Intent

11.4. Each State Party shall notify the Committee on Safety and Security at Sports Events, created by this Convention, in writing, of the name and contact details of its NFIP, and any subsequent changes with regard to it.

11.5. The Parties shall co-operate at international level in respect of sharing good practices and information on preventative, educational and informative projects and the establishment of partnerships with all agencies involved in the delivery of national and local initiatives, focused on or driven by the local community and supporters.

Compliance

The Bulgarian National Football Information Point (NFIP) is a valuable contributor to the European efforts in preventing and tackling sport-related violence, by attending and providing input to all the relevant meetings of the Saint-Denis Committee, European Group of Policing Football and NFIP Experts (Think Tank), EU Council Working Group on Major Sports Events (MSE), etc.

Recommendation 84: The Bulgarian authorities should maintain the composition of the Bulgarian delegation to the Saint-Denis Committee, both with regard to its high-level and multiagency composition, as it is a good practice to be followed by other States Parties to the Convention. (status: important)

SECTION D - Concluding remarks and Draft Action Plan

D.1 - Concluding remarks

In conclusion, the team would like to again stress that the monitoring report and accompanying draft Action Plan is intended to:

- assist and support the authorities in Bulgaria in developing a balanced multiagency integrated approach to safety, security and service at football matches and other sports events, based on established good practice, and customised to fit national circumstances; and
- assess the extent to which the current safety, security and service arrangements are compliant with the policy articles of the convention and the good practices contained in T-S4 Recommendations (2021)1, (2022)1 and (2022)2.

The team would like to stress once more that the Committee is engaged in providing the governmental and football authorities, and other competent agencies, in Bulgaria with further support in meeting the challenges that lie ahead. The Committee will follow-up the progress made by the authorities in Bulgaria concerning implementation of the recommendations in this report, as established in the T-S4 Guidelines on Monitoring.

The team expects that the new law will be an important driver for changing the paradigm and have a clear impact on the ground, as well as the new sports infrastructures that are planned or already being constructed.

The full commitment and political leadership of the Government and the Parliament to effectively tackle sport-related violence, the drafting of a new law on safety, security and service at sports events, the future establishment of a national co-ordination body, the engagement in constructing modern football stadiums and other sports infrastructures, and the progressive implementation of new technologies are five of the most positive points to be highlighted by the team in the context of this monitoring visit.

Finally, the team would like to thank, once again, all the colleagues in Bulgaria who provided much appreciated help and support and demonstrated impressive levels of co-operation and patience throughout the visit.

D.2 - Draft Action Plan

**Council of Europe Convention on an Integrated Safety, Security and Service Approach
at Football Matches and other Sports Events (CETS No. 218)**

Saint-Denis Committee

Monitoring visit to Bulgaria (Sofia, February-March 2025)

**REPORT OF THE MONITORING VISIT
DRAFT ACTION PLAN**

The Action Plan has been prepared with the aim of enabling the authorities in Bulgaria to:

- demonstrate compliance with the principles and outcomes enshrined in the policy articles of the Convention;
- reflect the established good practices on safety, security and service contained in T-S4 Recommendations (2021) 1, (2022)1 and (2022)2; and
- ensure that football stadiums (and other sports venues) provide a safe, secure and welcoming experience for all spectators and other participants.

To further assist this process, each of the various actions has been allocated a status of "essential", "important" or "desirable". This terminology is used to indicate the relevance of each action in terms of demonstrating compliance with the policy articles of the Convention and established European good practices. For ease of access, the recommended actions are presented under the relevant policy article of the Convention.

In recognition of the need to adopt an integrated approach, it is stressed that the actions overlap and are inter-related and should be considered and implemented in that light.

The text of this action plan refers specifically to football matches but can, where appropriate, also be applied in connection with other sports events, where considered necessary or appropriate by the national authorities.

It is recognised throughout that the recommended actions need to be considered in the light of national circumstances and imperatives and that the adoption of established good practices will need to be customised accordingly.

The team stands ready to provide, on request, support and assistance in taking forward the actions recommended in this draft Action Plan.

Article 1 - Scope of the Convention

Recommendation 1: The (proposed new) legal framework should specify that all professional football matches and other sports played in Bulgaria are subject to the articles of the Convention. In addition, the Ministry of Youth and Sports should consider and clarify in law what other sports events, if any, are subject to the Convention. (status: desirable)

Milestones	Timing	Lead Agency	Progress

Article 2 - Aim of the Convention

Recommendation 2: The new legal framework should include a generic commitment to delivering a multi-agency integrated approach to safety, security and service in connection with professional football events (inside and outside of stadiums and irrespective of the timing and location). (status: desirable)

Milestones	Timing	Lead Agency	Progress

Article 3 – Definitions			
Recommendation 3: The (proposed new) legal framework should incorporate the definitions set out in Article 3 of the Convention. (status: desirable)			
Milestones	Timing	Lead Agency	Progress
Article 4 - National and Local Co-ordination Arrangements			
Recommendation 4: The Bulgarian authorities should establish by law and implement in due time a national co-ordination committee, aiming at adopting a national strategy on safety, security and service, a multi-agency communication and media strategy and, according to the evolution of the risks and threats, updating the legal, regulatory and administrative frameworks (as envisaged in the section II of the draft law) (see <u>T-S4 Recommendation (2022) 1 on a Model Structure of a National Strategy on Safety, Security and Service at Football Matches and other Sports Events</u>). (status: essential)			
Milestones	Timing	Lead Agency	Progress

Recommendation 5: The legal framework should establish the composition, role and functions of the national co-ordination committee, which should depend upon the Ministry of Interior or Sport and include representatives from all relevant public and private stakeholders. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 6: The national co-ordination committee should be broken down into regional and local committees. The working arrangements at regional and local level should be captured in a framework or Terms of Reference document so that complete clarity in terms of agencies involved, primacy, aims and objectives, roles and responsibilities, and ranking of personnel expected to participate in the group are clearly defined. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 7: The national co-ordination Committee should establish a working group comprising representatives from local communities and supporter representatives. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 8: The national co-ordination committee should i) designate a municipal or regional authority to establish a local multi-agency group tasked to oversee and co-ordinate preparations for football events held in their locality; and ii) provide guidance on the structure, role, and membership of such groups, taking into account established European good practice. (status: desirable)			

Milestones	Timing	Lead Agency	Progress
Recommendation 9: The national co-ordination committee should review the current legal framework, and identify the legal amendments necessary to ensure that it: - complies with the Convention and the safety, security and service good practices contained in T-S4 Recommendations - facilitates and empowers delivery of all aspects of the national integrated multi-agency strategy; - provides clarity of roles and responsibilities of all public and private personnel engaged in football operations (inside and outside of stadiums); and - represents a balanced approach to safety, security and service. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 10: The national co-ordination committee should establish a multi-agency media and communication strategy tasked to proactively promote and explain the new integrated strategy and its components. (status: important)			
Milestones	Timing	Lead Agency	Progress
Article 5 - Safety, Security and Service in Sports stadiums			
Recommendation 11: The new legal framework should clearly set the roles and responsibilities of the event organisers, including their obligation to consult with partner agencies on the safety and service plans and procedures. (status: important)			

Milestones	Timing	Lead Agency	Progress
Recommendation 12: The Bulgarian authorities should review the current legal and regulatory position of club security officer and BFU security personnel, in preparation for the introduction of designated stadium safety officers. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 13: In the case of a safety officer and safety management team being used which are not those normally the responsible persons within the venue, a thorough review of the competence of such people should be carried out by a competent authority and, if any deficiencies are identified, appropriate amendments made to the safety management arrangements factor and, as a consequence, the maximum safe capacity level set out in the safety certificate (see: Spectator facilities - Part 10: Calculating of safe capacity in case of emergency). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 14: It is recommended that the event organiser develops and sets out a level of service and training expected of personnel supplied by the security company. A contract to this effect such as a service level agreement specifying the numbers, and quality of security staff should be in place (see T-S4 Recommendations). NB: this level of service and training plan should be consistent across all of Bulgaria. (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 15: The national co-ordination committee should make provision for the issue of a stadium safety certificate to be subject to a stadium having a designated, and accredited as competent, stadium safety officer tasked with responsibility for all in-stadiums safety, security and service matters. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 16: The national co-ordination committee should take full account of European good practices in developing minimum safety management arrangements (see: Guidance from the UK SGSA https://sgsa.org.uk/safety-management/). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 17: The BFU should liaise with relevant organisations on stadiums safety and security issues, including UEFA, regarding the possibility of appointing international experts to undertake safety inspections of all or selected stadiums hosting professional football matches in order to inform the development of enhanced technical, operating and safety management standards. (status: desirable)			
Milestones	Timing	Lead Agency	Progress

Recommendation 18: The national co-ordination committee should consider establishing an independent public authority tasked to: develop stadium safety standards, covering physical infrastructure, technical equipment and safety management arrangements; monitor application; assess effectiveness; and issue stadium safety certificates. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 19: The Bulgarian authorities should determine a strategy for modernising football stadiums in Bulgaria and clarify in law which agency should be responsible for stadiums physical infrastructure and associated improvements. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 20: the Bulgarian authorities should examine in a creative manner all possible sources of public and private funding (or a mix thereof) to meet the cost of modernising (either through renovating existing or building new) stadiums hosting professional football matches played in Bulgaria. (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 21: the Bulgarian authorities should take full account of European good practice in commissioning the preparation of model guidance for modernising football stadiums, incorporating minimum: (i) physical standards and facilities; and (ii) crowd management arrangements. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 22: The national co-ordination committee should make provision for the (proposed) independent public "stadium safety authority" to issue stadium safety certificates and monitor compliance with its conditions. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 23: The Bulgarian authorities should review the current stadium safety certification and inspection arrangements, taking into account European good practice. (As detailed in the INTERPOL Guidance INTERPOL Guide to Stadium Safety and Security Licensing and Certification - V2.pdf). (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 24: The local suitability licensing authority (or such other body setting the maximum safe capacity of the stadium) should take account not merely of the number of spectators that it can physically hold, having regard to its design and condition, but also the numbers that can be safely managed, in other words, the quality of the safety management.

The UK Guide to Safety at Sports Grounds 6th Edition (Green Guide) is the international recognised standard for setting a safe capacity within a stadium and detailed design criteria (see: <https://sgsa.org.uk/physical-factors/calculating-safe-capacity/>). Alternately, the Bulgarian Standards БДC EN 13200-1 (<https://bds-bg.org/en/project/show/bds:proj:100308>), 2019, Spectator facilities General characteristics for spectator viewing area; and прБДC EN 13200-10:2024 Spectator facilities - Part 10: Calculating of safe capacity in case of emergency (<https://bds-bg.org/en/project/show/bds:proj:122342>). (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 25: The training of the Regional Committee (Licensing Authority) staff should evaluate the process to determine the safe capacity of the stadium and each sector, based on the evacuation capacity of each sector and the quality of the safety management of the stadium (see INTERPOL Guide to Stadium Safety and Security Licensing and Certification-V2.pdf). (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 26: The Bulgarian authorities should ensure that European good practices are taken into account in determining stadium control room operations. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 27: A detailed command and control structure should be documented to provide details on the practicalities of each party within each of the control rooms and their specific responsibility (see T-S4 Recommendation (2021) 1, Annex A - Safety;

also see the SGSA Guidance (https://sgsa.org.uk/physical-factors/communications-and-control/control-room/ and https://sgsa.org.uk/wp-content/uploads/2021/09/Annex-C-Control-points.pdf). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 28: The relevant bodies should ensure that the procedures based on technologies, like the ticketing and accreditation, should have a redundant system to ensure business continuity, so as to mitigate the impact of technical or human failures or cyberattacks. Namely, with regard to electronic entry systems, stadium management should develop a robust backup system for use in case of a systems failure. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 29: The national co-ordination committee should commission an expert view on the efficacy of current stadiums CCTV and other technical facilities in order to determine what improvements are necessary to meet stadium safety needs and police evidence gathering purposes. A phased improvement programme should be introduced if the current facilities are considered to be of insufficient quality (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 30: The Bulgarian authorities should ensure higher service standards at major sports venues (stadiums and arenas), namely in terms of inclusiveness, sanitary and refreshment facilities. (status: important)			

Milestones	Timing	Lead Agency	Progress
Recommendation 31: The Bulgarian authorities should encourage the consultation of supporters' representatives and local communities and businesses in the design and construction of new/renovated stadiums. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 32: The Bulgarian authorities and the BFU should ensure that a satisfying level of services is integrated from the early stages of the stadium design, with a specific focus on toilets, food stalls or wheelchair user bays. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 33: The Bulgarian football authorities and clubs should ensure that a safe and welcoming environment is provided to a large public: families, women children, elderly, persons with disabilities, etc. This includes good accessibility, regular maintenance and cleaning of the stadium, clean and sufficient toilets, water and food at disposal, etc. (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 34: The Bulgarian football authorities and clubs should follow UEFA/ AccessibALL and IPC accessibility standards listed below, as well as the T-S4 Recommendation (2021)1, Annex C - Service on recommended good practices on “Inclusiveness and Combating Discrimination and Intolerance” and “Inclusiveness and Disabled Supporters”, and ensure that all existing sporting venues carry out an accessibility audit to enable development of an action plan for improvements to increase diversity and equality. (status: important)

a) UEFA Standard

<https://documents.uefa.com/v/u/UEFA-Guidelines/UEFA-Accessibility-Guidelines-Online>

b) IPC Standard

https://www.paralympic.org/sites/default/files/2020-11/IPC%20Accessibility%20Guide%20-%204th%20edition%20-%20October%202020_0.pdf

Milestones	Timing	Lead Agency	Progress

Recommendation 35: The Bulgarian authorities should agree upon a system of “statements of intent”, setting out clearly the roles and responsibilities of the police and the safety management staff, as well as the arrangements for transferring overall responsibility to the police in case of a relevant incident. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 36: The Bulgarian authorities should develop an integrated, multi-faceted strategy designed to deter, prevent and punish the use of pyrotechnics in football stadiums. Strict measures should be taken to prevent prohibited substances and objects to stadiums:

- The number of checkpoints at stadium entrances and periphery areas could be increased; and - Special training programs and/or awareness raising activities could be planned and developed for security forces in stadiums, especially on the use of pyrotechnics and other prohibited objects. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 37: The Bulgarian authorities should launch a public campaign to raise the awareness of the fans about the risks associated to the use of pyrotechnics at football matches and other sports events, in accordance with the recent scientific studies on this matter. This should include to limit the circulation of products used in home-made pyrotechnic devices (see: https://www.uefa.com/MultimediaFiles/Download/uefaorg/Stadium&Security/02/48/11/68/2481168_DOWNLOAD.pdf). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 38: For major football and other sports events, all fire officers, police officers, stewards, private security, staff of the stadium authorities, referees, players and all other persons working at the stadium, especially the key decision makers, should be briefed and trained on the UEFA pyrotechnic policy and guidelines and the action required to be taken by them to ensure that the proper procedures are used and the proper action taken to ensure the safety of all persons if pyrotechnics incidents occur. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 39: The Bulgarian authorities should consolidate effective policies to prevent, deter and respond to violent behaviour, namely through public campaigns, while progressing steadily towards a more balanced integration with the service pillar. (status: essential)			

Milestones	Timing	Lead Agency	Progress
Recommendation 40: The Bulgarian authorities should reinforce the legal framework and draft and implement a national strategy on combating hate speech, as well as adopt or improve public campaigns aimed at preventing any racist or other discriminatory behaviour, namely benefiting from the campaign of the EU-CoE joint project on “Combating hate speech in sport”, and guidance and assistance from international organisations who are experienced in drafting and delivering such programmes (ex: FARE). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 41: The BFU should develop clear regulations and disciplinary sanctions in the fight against discriminatory behaviours. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 42: The relevant authorities should put measures in place to refuse entry into the venue for spectators who display or carry with them racist or other discriminatory leaflets, symbols or banners and that the relevant authorities continue to apply zero tolerance in respect of any kind of discrimination inside the stadium and public spaces on the occasion of major sports events. (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 43: The national co-ordination committee should consider renaming Club Security Officers as club/stadium Safety Officers to reflect and emphasise their principal role and take full account of good practice in developing minimum standards on their competencies, status, training and authority. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 44: The Club Safety Officer/representative should be provided with a detailed job description which clearly sets out the functions of their post. The T-S4 Recommendation Rec(2021)1 (Annex A - Safety) and its good practices may be used to compile a checklist of functions necessary for the role. The national co-ordination committee should set the minimum areas of competence to be demonstrated by such safety officers, supervisors and safety stewards, taking into account both the core functions of each group and the variety of roles that they may perform, having regard to the checklists in the T-S4 Recommendation on this subject (see T-S4 Recommendation (2021) 1, Annex A – Safety -, Appendix 33, and Annex D - Checklist). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 45: A document or security/stewarding plan should be developed for each event, which contains the respective roles, responsibilities and precedence of the police, safety officer, stewards, volunteers, private security companies along with the competence expected of each practitioner (see T-S4 Recommendation (2021)1, Annex A – Safety). (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 46: The national co-ordination committee should identify and implement systems for ensuring the provision of adequate and appropriate training, at both the theoretical and practical level, for such safety officers, supervisors and safety stewards, and establish, document and monitor procedures for ensuring that those who have been trained are then assessed as being competent to perform their allocated tasks (see [T-S4 Recommendation \(2021\)1, Annex A - Safety, Appendix 33](#)). A national network should be established to enable stadium safety officers to share information along with sharing expertise and good practises (ESSMA, the European Stadium & Safety Management Association is the European network for this practice: <http://www.essma.eu/>). (status: desirable)

Milestones	Timing	Lead Agency	Progress

Recommendation 47: The Bulgarian authorities should equip and train police and stewards in an appropriate manner, namely in foreign languages. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 48: The event organiser should develop and set out a level of service and training expected of personnel supplied by the private security company. A contract to this effect, such as a service level agreement specifying the numbers and quality of safety staff, should be in place (see [T-S4 Recommendation \(2021\)1, Annex A - Safety](#)). (status: important)

Milestones	Timing	Lead Agency	Progress

Article 6 - Safety, Security and Service in Public Places

Recommendation 49: The relevant authorities should take account of the good practice contained in the Recommendation Rec (2021) 1 of the Saint-Denis Committee in developing plans for organised and spontaneous fan areas. Appropriate safety and security preparations should be developed; effective crowd management and crowd control arrangements should be in place for fan meeting points and fan walks. (status: important)			
Milestones	Timing	Lead Agency	Progress
Article 7 - Contingency and Emergency Planning			
Recommendation 50: A detailed command and control structure should be documented to provide details of the role of each party within the safety management operation and their specific responsibilities. This is considered to be essential to develop a clear hierarchical structure for clarity of who is in overall command of the event. All key decision makers should be located together in the same room (see T-S4 Recommendation (2021)1, Annex A - Safety). (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 51: The safety management should work with the police, emergency services and other competent local bodies, to develop comprehensive multi-agency contingency and emergency plans, in the sports venues and other relevant premises, and ensure that they are tested and refined in multi-agency table-top exercises. (status: essential)			
Milestones	Timing	Lead Agency	Progress

Recommendation 52: Once developed, the contingency plans in each stadium should be tested in multi-agency table-top exercises designed to identify any gaps in the contingency arrangements. Such exercises should involve all parties involved in the delivery of the event and incorporate a selection of differing scenarios which could occur either before, during or after a match. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 53: The relevant bodies should ensure that the procedures based on technologies, like ticketing and accreditation, should have a redundant system to ensure business continuity, so as mitigate the impact of technical failures of cyberattacks. Namely, regarding electronic entry systems, stadium management should develop a robust backup system for use in case of a systems failure. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 54: The relevant authorities should:

- (i) review and determine the appropriate pre-entry searching regime to be applied during the matches and the measures required to mitigate entry delays (e.g., effective signage en-route to the stadiums, explanatory communications to visiting supporters, pre-match entertainment etc.).**
- (ii) consider the response to be adopted should delays on entry generate safety risks;**
- (iii) once the arrangements have been reviewed, the outcome should feature in stadium contingency plans designating responsibility for determining whether or not to weaken security checks in the event of an emerging safety scenario;**
- (iv) as with other contingency plans, the arrangements should be subject to a multi-agency table-top exercise. (status: important).**

Milestones	Timing	Lead Agency	Progress
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Article 8 - Engagement with Supporters and Local Communities			
Recommendation 55: The relevant public and BFU should improve dialogue and communication with supporters, by developing and implementing supporter communication strategies, taking full account of established European good practices as set out in the T-S4 Recommendation (2021) 1, Annex C - Service. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 56: The relevant authorities should ensure that the needs of supporters and local communities and businesses are taken into account from the planning to the delivery of sports events, namely by integrating their representatives in the national and local co-ordination committees. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 57: The legal framework should establish the need for the top divisions' clubs to appoint supporter liaison officers (SLOs) and disability access officers (DAOs) (see T-S4 Recommendation (2021)1, Annex C - Service, 2021 UEFA Practical Guide to Supporter Liaison Officer and UEFA Disability Access Officer Handbook (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 58: The BFU should work with UEFA and Football Supporters Europe in the development of the role and the training of the SLOs, including via the organisation of an edition of UEFA Academy's SLO training in Bulgaria. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 59: In the absence of a national supporters organisation, and the absence of a structured dialogue policy at the BFU, Bulgarian authorities should consider the creation of a national consultative platform on supporters-related matters, bringing together all stakeholders, in order to foster a culture of dialogue, cooperation and mutual understanding between all parties. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 60: The national co-ordination group should encourage all stakeholders to consider the scope for developing preventative, social and educational projects connected with football events at both national and local level, whenever possible using players as role models. In particular, activities aimed at children and junior supporters should incorporate the promotion of values such as respect, tolerance, anti-violence and non-discrimination (see T-S4 Recommendation (2021)1, Annex C - Service). (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 61: The law in preparation should integrate or reinforce the service element and ensure a balance between preventative and repressive measures. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 62: The national authorities should work together with all partner agencies in order to enable a large diversity of people at the stadium, including women, children, persons with disabilities, etc. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 63: The sports authorities should be encouraged to develop relations with all categories of supporters, to encourage inclusion for the majority in a transparent and constructive way (see T-S4 Recommendation (2021)1, Annex C -Service). (status: important)			
Milestones	Timing	Lead Agency	Progress
Article 9 - Police strategies and operations			

Recommendation 64: In accordance with European good practice, policing tactics, profile and uniform should be determined on the basis of: ongoing dynamic risk analyses; graded deployment, with protective equipment used only where necessary; and early targeted and proportionate interventions to prevent the escalation of risk. (status: essential)			
Milestones	Timing	Lead Agency	Progress
Recommendation 65: The police should ensure regular specialised training for match commanders, spotters and football intelligence officers, in accordance with European good practice, and envisage common training and exercises with safety personnel. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 66: Police units to be deployed should be encouraged to proactively interact with and adopt a welcoming and friendly manner towards supporters. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 67: Police forces and other local agencies should commit to opening communication channels with SLOs and DAOs – when they are established - and supporters, in line with the guidance set out in the T-S4 Recommendation (2021) 1, Annex C -Service, Appendix M, and the EU Handbook on Police Liaison with Supporters (12792/16). (status: important)			

Milestones	Timing	Lead Agency	Progress
Recommendation 68: Supporter feedback should be considered in the risk assessment process before each match. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 69: The Bulgarian authorities should update and maintain the current system of peer review of football policing operations in order to identify more best practices and learning points. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 70: The Bulgarian police authorities should continue the development of intelligence gathering and dynamic risk assessment systems in order to adopt a risk-based deployment of forces. (status: essential)			
Milestones	Timing	Lead Agency	Progress

Recommendation 71: The Ministry of Interior should ensure that the Bulgarian National Football Information Point (NFIP) is resourced and equipped to undertake effectively first of all of the roles and tasks set out in article 11, paragraph 2 of the Convention and secondly play a key role in delivering the proposed comprehensive exclusion strategy. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 72: Police units deployed at sport events should be encouraged to interact proactively with supporters and to adopt a welcoming and friendly but firm attitude towards them. (status: important)

Milestones	Timing	Lead Agency	Progress

Article 10 - Prevention and Sanctioning of Offending Behaviour

Recommendation 73: The national co-ordination committee to be established should improve the exclusion strategies, with a view to introducing a more effective banning orders system, namely taking advantage of the CCTV system, as detailed in [Annex B \(Security\) of the T-S4 Recommendation \(2021\)](#)¹. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 74: The Bulgarian authorities are encouraged to create a network of prosecutors and magistrates responsible for sport, to raise awareness of sport-related violence and criminality and be part of the international network of magistrates and prosecutors (MARS), of the Council of Europe. (status: important)

Milestones	Timing	Lead Agency	Progress

Recommendation 75: The Bulgarian authorities should further invest in refining the actual exclusion system, which ensures that the troublemakers are not able to attend sporting events. The issued banning orders should be collected by a single central body or implemented in a single database, based on clear rules applicable to all sports, national and international, for use by all interested parties. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 76: The relevant authorities should ensure the development of a new digital ticketing system which will be connected to a centralised register of banning orders and that police - notably the NFIP - and other relevant public authorities have access to this register on a permanent basis, to enforce the bans effectively. (status: essential)

Milestones	Timing	Lead Agency	Progress

Recommendation 77: The types of criminal offences covering the organisation and conduct of sports competitions and the behaviour of spectators and participants of these competitions within sports facilities and in adjacent areas should be included in national legislation. (status: important)

Milestones	Timing	Lead Agency	Progress
Recommendation 78: The Bulgarian authorities should consolidate effective policies to prevent, deter and respond to violent behaviour. Administrative or criminal sanctions should be imposed swiftly in accordance with the procedure set forth in national legislation against those who violate public order and cause damage to property and/or third parties, and implemented with zero tolerance. (status: important)			
Milestones	Timing	Lead Agency	Progress
Article 11 - International Co-operation			
Recommendation 79: The Bulgarian authorities should ensure that all police commanders and their personnel engaged in the preparations for, and operations during major sports events keep receiving appropriate and specialist training in European policing football good practices. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 80: The Bulgarian National Football Information Point (NFIP) should be regularly resourced, trained and equipped, to effectively undertake its roles and responsibilities. The NFIP should be regularly informed of the list of banning orders. (status: essential)			

Milestones	Timing	Lead Agency	Progress
Recommendation 81: The Bulgarian police authorities should continue to invest in the development of the national network of police spotters and in their training. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 82: The Bulgarian National Football Information Point (NFIP) should organise annual meetings of its national network of spotters, mainly after the end of the football season, in order to address emerging challenges and points for attention. (status: important)			
Milestones	Timing	Lead Agency	Progress
Recommendation 83: The Bulgarian National Football Information Point (NFIP) should work closely with the other police departments responsible for organised crime in order to prepare evidence packages for the prosecution of football troublemakers. (status: important)			
Milestones	Timing	Lead Agency	Progress

Recommendation 84: The Bulgarian authorities should maintain the composition of the Bulgarian delegation to the Saint-Denis Committee, both with regard to its high-level and multiagency composition, as it is a good practice to be followed by other States Parties to the Convention. (status: important)

Milestones	Timing	Lead Agency	Progress

ANNEXES

ANNEX A – Saint-Denis Convention (CETS No 218) - Policy Articles

ARTICLE 1 – Scope

1. The Parties shall, within the limits of their respective constitutional provisions, take the necessary steps to give effect to the provisions of this Convention in respect of football matches or tournaments played in their territory by professional football clubs and national teams.
2. The Parties may apply the provisions of this Convention to other sports or sports events hosted in their territory, including non-professional football matches, especially in circumstances where safety or security risks are involved.

ARTICLE 2 – Aim

1. The aim of this Convention is to provide a safe, secure and welcoming environment at football matches and other sports events. To that end, the Parties shall:
2. adopt an integrated, multi-agency and balanced approach towards safety, security and service, based upon an ethos of effective local, national and international partnerships and co-operation;
3. ensure that all public and private agencies, and other stakeholders, recognise that safety, security and service provision cannot be considered in isolation, and can have a direct influence on delivery of the other two components; and
4. take account of good practices in developing an integrated approach to safety, security and service.

ARTICLE 3 – Definitions

For the purposes of this Convention, the terms:

- a. “safety measures” shall mean any measure designed and implemented with the primary aim of protecting the health and wellbeing of individuals and groups who attend, or participate in, a football or other sports related event, inside or outside of stadiums, or who reside or work in the vicinity of the event;
- b. “security measures” shall mean any measure designed and implemented with the primary aim of preventing, reducing the risk and/or responding to any violence or other criminal

activity or disorder committed in connection with a football or other sports related event, inside or outside of stadiums;

- c. “service measures” shall mean any measure designed and implemented with the primary aim of making individuals and groups feel comfortable, appreciated, and welcome in connection with a football or other sports related event, inside or outside of stadiums;
- d. "agency" shall mean any public or private body with a constitutional, legislative, regulatory or other responsibility in respect of the preparation and implementation of any safety, security or service measure in connection with a football or other sports related event, inside or outside of stadiums;
- e. "stakeholder" shall mean spectators, local communities or other interested parties who do not have legislative or regulatory responsibilities but who can play an important role in helping to make football or other sports events safe, secure and welcoming, inside and outside of stadiums;
- f. "integrated approach" shall mean recognition that, irrespective of their primary purpose, football and other sports related safety, security and service measures invariably overlap, are inter-related in terms of impact, need to be balanced, and cannot be designed or implemented in isolation;
- g. “multi-agency integrated approach” shall mean recognition that the roles and actions of each agency involved in football or other sports related planning and operational activity should be co-ordinated, complementary, proportionate, and designed and implemented as part of a comprehensive safety, security and service strategy;
- h. "good practices" shall mean measures applied in one or more countries that have proven to be very effective in meeting the stated aim or objective;
- i. "relevant agency" shall mean a body (public or private) involved in the organisation and/or management of a football or other sports related event held inside or outside of sports stadiums.

ARTICLE 4 – Domestic co-ordination arrangements

1. The Parties shall ensure that national and local co-ordination arrangements are established for the purpose of developing and implementing a multi-agency integrated approach to safety, security and service at national and local level.
2. The Parties shall ensure that co-ordination arrangements are established to identify, analyse and evaluate the risks pertaining to safety, security and service, and allow the sharing of updated information on risk assessment.

3. The Parties shall ensure that the co-ordination arrangements involve the participation of all key public and private agencies engaged in safety, security and service matters connected with the event, both inside and outside of the venue where the event is taking place.
4. The Parties shall ensure that the co-ordination arrangements take full account of the safety, security and service principles set out in this Convention and that national and local strategies are developed, regularly evaluated and refined in the light of national and international experience and good practice.
5. The Parties shall ensure that national legal, regulatory or administrative frameworks clarify the respective roles and responsibilities of the relevant agencies and that these roles are complementary, consistent with an integrated approach, and widely understood at a strategic and operational level.

ARTICLE 5 – Safety, security and service in stadiums

1. The Parties shall ensure that national legal, regulatory or administrative frameworks require event organisers, in consultation with all partner agencies, to provide a safe and secure environment for all participants and spectators.
2. The Parties shall ensure that the competent public authorities put in place regulations or arrangements to guarantee the effectiveness of stadium licensing procedures, certification arrangements and safety regulations in general and ensure their application, monitoring and enforcement.
3. The Parties shall require the relevant agencies to ensure that stadium design, infrastructure and associated crowd management arrangements comply with national and international standards and good practices.
4. The Parties shall encourage the relevant agencies to ensure that stadiums provide an inclusive and welcoming environment for all sections of society, including children, the elderly and those with disabilities, and incorporate, in particular, the provision of appropriate sanitary and refreshment facilities and good viewing conditions for all spectators.
5. The Parties shall ensure that stadiums operating arrangements are comprehensive; make provision for effective liaison with the police, emergency services, and partner agencies; and incorporate clear policies and procedures on matters that might impact on crowd management and associated safety and security risks, including:
 - use of pyrotechnics;
 - any violent or other prohibited behaviour; and
 - any racist or other discriminatory behaviour.
6. The Parties shall require the relevant agencies to ensure that all public and private personnel involved in making football and other sports events safe, secure and welcoming are equipped and trained to deliver their functions effectively and in an appropriate manner.

7. The Parties shall encourage their competent agencies to highlight the need for players, trainers or other representatives of participating teams to act in accordance with key sports principles, like tolerance, respect and fair play, and recognise the negative impact which acting in a violent, racist or other provocative manner can have on spectator behaviour.

ARTICLE 6 – Safety, security and service in public places

1. The Parties shall encourage all agencies and stakeholders involved in organising football and other sports related events in public spaces, including the municipal authorities, police, local communities and businesses, supporter representatives, football clubs and national associations, to work together, notably in respect of:
 - a) assessing risk and preparing appropriate preventative measures designed to minimise disruption and provide reassurance to local communities and businesses, in particular those located in the vicinity of where the event is taking place or public viewing areas; and
 - b) creating a safe, secure and welcoming environment in public spaces that are designated for supporters to gather before and after the event, or locations in which supporters can be expected to frequent of their own volition, and along transit routes to and from the city and/or to and from the stadium.
2. The Parties shall ensure that risk assessment and safety and security measures take account of the journey to and from the stadium.

ARTICLE 7 – Contingency and emergency planning

The Parties shall ensure that multi-agency contingency and emergency plans are developed, and that those plans are tested and refined in regular joint exercises. National legal, regulatory or administrative frameworks should make clear which agency is responsible for initiating, supervising and certifying the exercises.

ARTICLE 8 – Engagement with supporters and local communities

1. The Parties shall encourage all agencies to develop and pursue a policy of pro-active and regular communication with key stakeholders, including supporter representatives and local communities, based on the principles of dialogue, and with aim of generating a partnership ethos and positive co-operation as well as identifying solutions to potential problems.
2. The Parties shall encourage all public and private agencies and other stakeholders, including local communities and supporter representatives, to initiate or participate in multi-agency

social, educational, crime prevention and other community projects designed to foster mutual respect and understanding, especially amongst supporters, sports clubs and associations as well as agencies responsible for safety and security.

ARTICLE 9 – Police strategies and operations

1. The Parties shall ensure that policing strategies are developed, regularly evaluated and refined in the light of national and international experience and good practice, and are consistent with the wider, integrated approach to safety, security and service.
2. The Parties shall ensure that policing strategies take account of good practice including, inter-alia: intelligence gathering; ongoing risk assessment; risk-based deployment; proportionate intervention to prevent escalation of risk or disorder; effective dialogue with supporters and the wider community; and evidence gathering of criminal activity as well as the sharing of such evidence with the competent authorities responsible for prosecution.
3. The Parties shall ensure that the police work in partnership with organisers, supporters, local communities and other stakeholders in making football and other sports events safe, secure and welcoming for all concerned.

ARTICLE 10 – Prevention and sanctioning of offending behaviour

1. The Parties shall take all possible measures to reduce the risk of individuals or groups participating in or organising incidents of violence or disorder.
2. The Parties shall, in accordance with national and international law, ensure that effective exclusion arrangements, appropriate to the character and location of risk, are in place to deter and prevent incidents of violence or disorder.
3. The Parties shall, in accordance with national and international law, co-operate in seeking to ensure that individuals committing offences abroad receive appropriate sanctions, either in the country where the offence is committed or in their country of residence or of citizenship.
4. Where appropriate, and in accordance with national and international law, the Parties shall consider empowering the judicial or administrative authorities responsible for imposing sanctions on individuals who have caused or contributed to incidents of football-related violence and/or disorder, with the possibility of imposing restrictions on travel to football events held in another country.

ARTICLE 11 – International co-operation

1. The Parties shall co-operate closely on all, and associated, matters covered by this Convention in order to maximise collaboration in respect of international events, share experiences and participate in the development of good practices.
2. The Parties shall, without prejudice to existing national provisions, in particular the allocation of powers among the different services and authorities, set up or designate a national football information point of a police nature (NFIP). The NFIP shall:
 - a) act as the direct and single contact point for exchanging general (strategic, operational and tactical) information in connection with a football match with an international dimension;
 - b) exchange personal data in accordance with the domestic and international rules;
 - c) facilitate, coordinate or organise the implementation of international police cooperation in connection with football matches with an international dimension.
 - d) be capable of fulfilling efficiently and promptly the tasks assigned to it.
3. The Parties shall further ensure that the NFIP provides a national source of expertise regarding football policing operations, supporter dynamics and associated safety and security risks.
4. Each State Party shall notify the Committee on Safety and Security at Sports Events, created by this Convention, in writing, of the name and contact details of its NFIP, and any subsequent changes with regard to it.
5. The Parties shall co-operate at international level in respect of sharing good practices and information on preventative, educational and informative projects and the establishment of partnerships with all agencies involved in the delivery of national and local initiatives, focused on or driven by the local community or supporters.

ANNEX B - Meetings attendees

All meetings were attended by:

- Mr. Minko Pondev, Head of NFIP Bulgaria, General Directorate National Police, Ministry of Interior
- Mr. Vasil Sokolov, Inspector at NFIP Bulgaria, General Directorate National Police
- Ms. Dimana Doynova, Inspector at NFIP Bulgaria, General Directorate National Police
- Ms. Teodorina Todorova, Director of “European Programmes, Projects and International Cooperation” Directorate, Ministry of Youth and Sports
- Mr. Lorenzo Karo, Head of “International Cooperation” Department at the “European Programmes, Projects and International Cooperation” Directorate, Ministry of Youth and Sports
- Mr. Teodor Tomov, Inspector at NFIP Bulgaria, General Directorate National Police
- Ms. Hristina Ivanova, Inspector at NFIP Bulgaria, General Directorate National Police

26.02.2025

Meeting at General Directorate National Police

- Mr. Emil Parmakov, Deputy Director of General Directorate National Police

27.02.2025

Meeting at the Ministry of Interior

- Mr. Toni Todorov, Deputy Minister of Interior
- Mr. Filip Popov, Deputy Minister of Interior
- Mr. Nikolay Danovski, Head of “European Policies and Initiatives” Department at “European Union and International” Cooperation Directorate
- Ms Ruzha Bogatsevska, senior legal expert at “Internal Security Matters and Police Cooperation in the EU” Unit at the “European Union and International Cooperation” Directorate
- Ms Ivelina Dundakova, Head of “Regional Cooperation and International Organisations” Unit, “Bilateral and Multilateral Cooperation” Department at the “European Union and International Cooperation” Directorate
- Ms Milena Dzhumayska, senior expert at Bilateral and Multilateral Cooperation” Department at the “European Union and International Cooperation” Directorate

Meeting with the Parliamentary Committee on Internal Security and Public Order

- Mr. Manoil Manev, Chairman of the Committee on Internal Security and Public Order, National Assembly of Bulgaria
- Mr. Krasen Kraleov, Deputy Chairman of the Committee on Youth and Sports Matters, National Assembly of Bulgaria

Meeting at the Ministry of Youth and Sports

- Mr. Ivan Peshev, Minister of Youth and Sports
- Mr. Petar Mladenov, Deputy Minister of Youth and Sports
- Mr. Dimitar Georgiev, counsellor to the Minister of Youth and Sports

28.02.2025

Meeting at the BFU

- Mr. Georgi Ivanov, President of the BFU
- Mr. Andrey Petrov, Executive director of the BFU
- Mr. Dobrin Gionov, Deputy Executive Director of the BFU
- Mr. Blagovest Boychev, “Relations with supporters” expert at the BFU

Meeting with representatives of football club PFC “Levski” – Sofia at the “Georgi Asparuhov” stadium

- Mr. Daniel Borimirov, Executive Director of PFC “Levski” – Sofia
- Ms. Galina Kostova, International Relations Officer
- Mr. Valentin Dimitrov, Security Expert
- Mr. Kaloyan Zarzanov, Director of “Georgi Asparuhov” stadium

01.03.2025

Meeting at football club PFC “CSKA”

- Mr. Mihail Alexandrov, Technical Director
- Mr. Radoslav Sotirov, Security Officer
- Mr. Ivailo Simeonov, Security Officer

Meeting with Bulgarian Basketball Federation representatives

- Mr. Georgi Glushkov, President
- Mr. Todor Kolev, “Events and Marketing” manager

Meeting with supporters PFC “Levski”

- Mr. Nikola Bushnyakov

02.03.2025

Preparatory technical meeting before the CSKA-Levski derby

- Mr. Valentin Dimitrov – Levski representative – security officer
- Mr. Radoslav Sotirov – CSKA representative – security officer
- Mr. Radoslav Gidjerov – referee
- Mr. Stoyan Velchev – delegate
- Mr. Georgi Ignatov – referee observer

The meetings were supplemented by observation of the stadium safety and security arrangements at a match of the Bulgarian football derby CSKA –Sofia vs Levski – Sofia.

ANNEX C - Match details

The match security was completely organised by the Police with dialogue from the Local Authority, Ministry of Youth and Sports, the Football Union, the stadium operator, both clubs and both supporter group.

Prior to the match the CSKA and Levski supporters organised a fan walk from different sides of the city.

The match day risk assessment was carried out by the Bulgarian Police (NFIP Bulgaria). Fan walks and the meeting points were discussed and planned in advance by the police, the organiser and the relevant supporter groups. The two fan-walks were organised and were framed by the Police effectively and creating a safe and secure environment. The time of the fan walks was different in order to avoid any possible meeting and clashes. The main disruption was due to the use of a massive number and diversity of pyrotechnic devices, producing much smoke and noise in the public space. Due to the fact that there was a delay on the arrival of the Levski supporters at the stadium, there was pressure in the police forces in order to enter in the stadium on time. Riot police squads were deployed to prevent the escalation of risk.

These pre-match fan walks although very disruptive to the local residents and businesses were well controlled and professionally stewarded by the police, which could have been very problematic without the Police involvement. There was numerous pyrotechnics throughout the marches, other than this the fan walks seemed orderly.

For high risk matches in Bulgaria the Police take full responsibility for all security outside the stadium with the Stadium operator responsible for inside the stadium, although the control room inside the stadium was completely controlled only by the different police units (Local, National and Gendarmerie) while the other key safety, security and service delivering partners as home club security officer(s), fire, medical services, private security and stadium management were missing.

The lack of a fully integrated approach with both the safety management of the stadium and the Police commanders in the above-mentioned stadium is a deviation from the T-S4 recommendations. For this recommendation to prevail, the club safety management and Police should be housed in the same control room to support each other and provide swift control, command, communication and co-operation to address minor or major incident. It is understood that the Law and the contract states that the Police was solely responsible for matchday security, and this is the reason why both the Safety Management and Police have separate control rooms in different locations of the stadium, although they do have protocols for control and command, to address matchday incidents.

During the fan walks and the match, a big number of pyros was used from the fans of the 2 teams. There were 340 security/stewards (2 security companies) and 1957 Police officers in attendance for this match, and although the team was not able to ascertain the deployment plan or training of staff for the private security company, it is understood that all security staff are licensed and have

a robust training regime in general security, however this is not specific to stadium safety, security and service.

The pre-match safety meeting was observed by the team. Stoyan Velchev, Sofia's former deputy police chief, chaired the meeting asking both clubs security staff, police, fire and medical staff to sign a security satisfaction document at the end of the meeting.

In many countries, the physical limit of responsibility is determined by the boundaries set and recorded within the safety certificate. This would usually extend to the legal boundary of ownership of the site where thereafter responsibility would rest with the appropriate authorities (i.e. local authority and police). In Bulgaria, however, it is clear that the police have lead responsibility outside of a stadium.

The Police had created outer physical barrier or cordon around the stadium to allow for the filtering, searching and ticket checking of spectators on arrival. Such measures help to reduce pressures in the immediate vicinity of the stadium (for example at turnstiles) but can themselves create additional problems if not operated and managed efficiently and effectively.

The Southwest corner of the stadium had a series of search barriers at the top of stairs leading from a carpark. Due to the Levski fan's march most of this ingress point was saturated with spectators at the same time with densely populated queuing on the stairs. There was, at this point a risk of a progressive crowd collapse due to overcrowding. An empty car park with Disney type queuing system at the bottom of the stairs could have been a solution to mitigate this risk.

In this regard it should be ensured that an adequate number of entry and exit points are provided at the outer cordon to more than meet the expected flow of spectators and the aggregated entry and exit widths of the stadium. Entry and exit points should be clearly signed and evenly distributed around the venue. The structure forming the outer cordon should also be of robust construction and be able to withstand expected crowd pressures. To ease pressure at the outer cordon, adequate, well-lit signage, in appropriate languages for the event should be located en-route to the stadiums setting out prohibited items and stadium rules.

It should be recognised that flow rates of entry to the stadium will be significantly impaired by any significant outer cordon searching process. This should be recognised in evaluating the maximum safe capacity. It should also be recognised that entry delays caused by the imposition of strict searching regimes can generate frustration and anger among spectators and increase safety and security risks. It could be planned to overcome this scenario, by opening the turnstiles up to 3 hours before kick-off. However, this is only likely to assist if there is an incentive for spectators to arrive early, such as pre-match entertainment and activities. But this would not help the situation with fan marches.

During the match, there was a distinct lack of stewarding within the ultra-areas. The team observed, there were no stewards in either end behind the goal despite the fact that the fans in this area were encouraged to create an atmosphere. There did not appear to be any attempt to manage the supporters at either end of the stadium. The sole purpose of the steward/security personnel

appeared to be to unlock the exit gates in case of evacuation. There were numerous pyrotechnics ignited by ultras throughout the match and other than “no rocket type pyros”, the team did not ascertain whether there had been any discussions between the stadium management and this group about what they could and could not do or whether these ultras were tacitly allowed to behave as they wished. There appeared to be a lack of crowd management throughout as spectators on three sides of the stadium stood on their seat, blocked vomitories and radial gangways which impeded the free flow of spectators as well the movements of first aid, police, fire and private security during possible emergency and crises situations. In one case a fan stood on the back wall in a precarious position waving large flags. Nobody in these areas stayed seated.

The team did not have an opportunity to question the security personnel about either their tasks or their training. Their role appeared largely passive, though this may not necessarily be a true reflection of the situation. It would be interesting to test how they would react when faced either with a safety problem, or an incident of misbehaviour or with the need to evacuate the stadium.

There was a holdback of spectators following the match even holding back the corporate/VIP areas. This was explained to be the norm for all high-risk matches, to protect all spectators.



District lack of stewards in tribune



Boy waving flag precariously at back



Overcrowding on stairs to Southwest entry

Following the derby between CSKA and Levski, the Disciplinary Committee of the BFU announced the fines for the two football clubs.

Levski had to pay a total of 10,300 BGN (approx. 5150 EUR), while CSKA were sanctioned with 6,300 BGN (3150 EUR). In addition, Levski had to cover the damages to the Vasil Levski National Stadium. Furthermore, Levski had also received a warning of a home-game suspension due to an object thrown at CSKA player. Regarding the arrests, a total of 31 people have been detained – 7 persons for possession of drugs and 24 for carrying prohibited items and objects.

ANNEX D - BFU Social Responsibility Strategy – More than a Game (2023-2027)



Bulgarian Football
Union - More than a

PART 3

COMMENTS BY BULGARIA

ON THE REPORT BY THE MONITORING TEAM

COMMENTS BY BULGARIA

The Bulgarian authorities would like to express their appreciation for the comprehensive and professional approach adopted by the monitoring team. The draft report provides an overall objective and balanced assessment of the current state of implementation in Bulgaria and offers a wide range of constructive recommendations.

General observations

The authorities agree with most of the findings and conclusions set out in the report and value the numerous recommendations aimed at supporting Bulgaria in aligning with the standards and good practices of the Saint-Denis Convention. The report duly captures the present challenges in the areas of safety, security and service, in particular with regard to stadium infrastructure, stewarding systems, inter-agency coordination, legislative changes and legal clarity.

Recent developments

Since the time of the visit, the National Assembly of Bulgaria has made progress on the new legislative initiative. The Draft Law on Safety and Security at Sports Events (No. 51-554-01-54), tabled in February 2025, successfully passed a first reading in both the Committee on Youth and Sports (21 May 2025) and the Committee on Internal Security and Public Order (12 June 2025). The bill introduces a comprehensive framework for managing safety and security through the establishment of a National Coordination Commission and local coordination bodies, the provision of legal definitions for key concepts and functions, a certification system for sports venues and the development of a single automated registry at the Ministry of the Interior.

The bill is currently in an intermediate phase in which working groups are refining the provisions prior to the second reading. The second reading is expected shortly, with a view to adoption ahead of upcoming major sports fixtures. Following adoption, promulgation in the State Gazette and entry into force are envisaged, in line with the established constitutional procedure.

General comments and clarifications on key findings

While the report rightly emphasizes the need for swift and sustainable infrastructure improvements, the authorities operate within budgetary constraints and security-related considerations. The Government recognises these challenges and is actively seeking workable models to address them. New sports facilities in Bulgaria are currently designed and built in line with European requirements, applying modern materials and technologies that ensure spectator safety and quality of service.

In addition, the Ministry of Youth and Sports has initiated the development of a new, modern national stadium that will comply with all international standards on safety, security and service. To this end, an inter-agency working group has been established to develop the concept and follow-up actions for the construction of the new national stadium, subject to available funding.

The project is a key element of the Governance Programme of the Republic of Bulgaria for the period 2025–2029 and aims not only to deliver a top-tier facility but also to reinforce Bulgaria’s capacity to host prestigious international sporting events. The new stadium will be designed with a focus on sustainability, digitalisation and innovative crowd-management solutions. Its implementation will ensure the holding of sports events in full compliance with the principles of the Convention.

The authorities also recognise the importance of strengthening the Convention’s “service” pillar in Bulgaria. In this context, practical and low-budget measures – “quick wins” (such as improved sanitary facilities, food kiosks and accessible spectator areas) are being discussed as an interim step until more substantial infrastructure upgrades become feasible.

The authorities acknowledge the conceptual confusion between “safety” and “security”. To reduce this, the draft law allocates responsibilities among the relevant actors — owners, users or concessionaires of sports venues, event organisers, safety officers, stewards, public authorities and the police — each with a clearly defined role.

Furthermore, the draft provides for an integrated operational model based on advance planning and cooperation among all stakeholders within the framework of the National Coordination Plan. It establishes a clear order for the Operational Command Centre (OCC), which should include not only the police but also the organiser’s safety and security coordinator, as well as representatives of emergency medical services, the fire service and other key actors according to the event’s risk profile. This set-up ensures that the OCC reflects the multi-faceted and integrated approach promoted by the Saint-Denis Convention. It is intended to foster shared situational awareness and joint decision-making, enabling the safety and security elements to function in parallel and with mutual respect for their roles and mandates.

In response to the report’s findings regarding the absence of enduring coordination mechanisms, the proposed legislation provides for the creation of permanent national and regional coordination committees to ensure integrated, continuous and cross-sectoral planning. The draft law envisages permanent regional coordination committees under the authority of the regional governor (Article 6). These are inter-agency bodies with clearly defined responsibilities, including oversight of venue certification, approval and implementation of safety and security plans for specific events, and the resolution of operational ambiguities. Importantly, these bodies are not limited to event-specific coordination: their mandate also includes long-term planning, implementation of the National Coordination Plan at local level and ensuring consistent application of the integrated approach. This addresses the concerns expressed in the report and brings the Bulgarian system closer to European good practice.

With regard to infrastructure and service, the new legislative framework provides for a mandatory certification regime for venues, requiring compliance with standards for facilities, equipment and staffing. The exact criteria will be set out in secondary legislation, and uncertified venues will not be allowed to host events. In addition, the Bulgarian Football Union (BFU) stands ready to liaise with international experts and competent organisations with a view to experience-sharing and expert inspections of stadiums. As noted in the report, the BFU does not have its own financial

resources for infrastructure modernisation, but is committed to the process and will provide support within its powers and resources, in partnership with public institutions and venue owners.

The new legal definition of stewards as a category distinct from the police lays the foundation for their structured introduction. A system for their training and accreditation is envisaged, in cooperation with the Ministry of Youth and Sports and other stakeholders.

The authorities also consider additional guidance and joint trainings in secondary legislation or internal protocols in order to improve communication and tactical cooperation on match day.

BFU and Ministry of Interior consider additional trainings for the security officers, SLOs and BFU delegates in order to improve the tactical coordination on match day.

In addition, the Ministry of Youth and Sports is translating into Bulgarian the full toolkit on the Saint-Denis Convention, developed by the Council of Europe, so as to ensure national-level accessibility. The aim is to use these materials during forthcoming trainings, seminars and information events to build the capacity of all institutions and organisations involved in safety, security and service at sports events.

The Bulgarian authorities fully subscribe to the principle of zero tolerance towards discriminatory behaviour. While there is no statistically significant information on the prevalence of such behaviour at sports events in Bulgaria, the BFU has developed an action strategy whose measures include awareness-raising initiatives, trainings and the strengthening of disciplinary mechanisms.

Regarding the Supporter Liaison Officer (SLO) function, the Bulgarian Football Union acknowledges the need for improvements and has taken concrete steps, including appointing a coordinator and holding seminars and meetings with clubs. The BFU intends to organise further trainings and explanatory guidance in this area, including through UEFA Academy programmes, so as to align national practice with the guidance of UEFA and the Council of Europe.

The Bulgarian authorities fully support the need for enhanced dialogue and effective communication with football supporters. The BFU stands ready to work with the competent authorities on the development and implementation of fan-engagement strategies aligned with good European practice. We are open to partnerships that would help strengthen trust between institutions and supporters.

The Bulgarian side, in principle, supports the majority of the recommendations and considers them timely and useful. To ensure unambiguous interpretation and effective implementation, we would welcome further clarification of the terms “supporter feedback” (rec. 68), “peer review” (rec. 69) and “types of criminal offences covering the organisation and conduct of sports competitions” (rec. 77). Regarding rec. 74 (a network of prosecutors and judges responsible for the sports sector), implementation should reflect the specifics of the Bulgarian judicial system and the practical feasibility of identifying and designating such profiles. As an interim step, there could be an information campaign on sports-related disorder for members of the judiciary, including a presentation of the Convention. On rec. 78 (the swift imposition of administrative or criminal

sanctions), we note that proceedings against offenders who breach public order already take place within short, statutory time-limits. We remain available for further dialogue to clarify the above concepts and to agree on the most appropriate implementation mechanisms.

Finally, we welcome the report's acknowledgement of the spirit of cooperation among public authorities, the BFU, clubs and civil society, which was evident during the visit. This reinforces our determination to continue the reform process and to present a comprehensive Action Plan, in line with paragraph 5.9 of the Guidelines. To this end, a working group involving all stakeholders will be established to identify the specific measures and the timeframe for implementing the recommendations.

Concluding remarks

The Bulgarian authorities would like to thank the Council of Europe, the Secretariat of the Saint-Denis Convention and the visiting team for their cooperation and the constructive report. We reaffirm our full commitment to the effective implementation of the Saint-Denis Convention. The monitoring team's recommendations will directly contribute to both the finalisation of the new legislative framework and the development of a national action plan. We remain open to continued cooperation with the Council of Europe and the Saint-Denis Committee, including through follow-up dialogue and technical assistance, where appropriate.