



# MEDIA CAPTURE MONITORING REPORT: **BULGARIA**

MEASURING EMFA  
COMPLIANCE

*November 2025*

# MEDIA CAPTURE MONITORING REPORT: BULGARIA

The International Press Institute (IPI) and the Media and Journalism Research Center have partnered up to produce the Media Capture Monitoring Report on Bulgaria, an annual report to measure media capture in the country and the degree to which the Member State meets the new EU regulation to combat the problem.

In August 2025, the European Media Freedom Act (EMFA) came into full force and Member States are required to enact reforms to align with the new regulation.

The Bulgarian report focuses on EMFA elements directly addressing media capture, namely, the independence of public service media and of media regulators, the misuse of state funds to influence media, and ensuring ownership transparency and media pluralism.

The report examines the standards prescribed by law and how they are currently implemented in practice. It also sets out the areas of reform needed to bring the country into line with EMFA while also making recommendations for where reform can go further.

The report is intended an important tool for journalist and media rights groups and national policy makers to guide reform and monitor the degree to which Bulgaria is meeting its obligations.

The Media Capture project is a part of the Media Freedom Rapid Response (MFRR), a Europe-wide mechanism which tracks, monitors and responds to violations of press and media freedom in EU Member States and Candidate Countries. The project is co-funded by the European Commission.

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## Changes in 2024/25

Bulgaria has made no tangible progress since the European Media Freedom Act (EMFA) came into force in August 2025. Although a cross-ministerial and institutional working group was previously established, its suspension stalled much needed reforms. Beyond a few news reports at the time of its adoption, the implementation of the EMFA has scarcely featured in public debate and remains largely absent from the political agenda.

In 2024, the Ministry of Culture, which is responsible for media policy, established a working group to align national legislation with the EMFA. However, despite making initial progress the working group was suspended. The current status of the working group at the time of publication was unclear. The ministry did not respond to questions regarding the group's progress, Bulgaria's readiness to meet the regulation's requirements, or the timeline for implementation. Instead, it referred only to its current role under existing law, which requires print media outlets to register with the ministry.

Concerns over this lack of engagement were highlighted during a press freedom mission to Bulgaria in September 2025, organised by the Council of Europe's Safety of Journalists Platform and the Media Freedom Rapid Response.<sup>1</sup> The Ministry of Culture was described as "the only relevant public authority which refused to meet the delegation, despite repeated requests."<sup>2</sup> Following the visit, partner organisations called for "much-needed reforms under the EMFA, which if properly implemented will help safeguard media freedom, pluralism and independence," urging Bulgarian institutions and political leaders to accelerate efforts in this area. In the meantime, the Ministry of Culture told the mission that a new working group has been formed to implement EMFA reforms to the Radio and Television Act. However, "no information was provided about plans for wider implementation of any other Articles of EMFA and the timeline for additional reforms remains unclear".<sup>3</sup> The mission's final report concludes that "the authorities' preparedness for alignment with the EMFA remains low".<sup>4</sup>

Although a regularly elected coalition government led by Rosen Zhelyazkov took office in January 2025<sup>5</sup>, after four years of political turbulence and repeated caretaker administrations, media freedom has not ranked high among the cabinet's priorities. In early October, one of the junior partners in the ruling coalition, the populist There Is Such a People party, proposed amendments to the Penal Code that, if adopted, would introduce prison sentences of up to six years and fines for disseminating personal information about an individual without their consent. The bill was swiftly approved by a parliamentary committee shortly after it was tabled. However, following strong criticism from Bulgarian<sup>6</sup>

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<sup>1</sup> Bulgaria: Mission to examine media freedom and independent journalism, [ipi.media](https://ipi.media/bulgaria-mission-to-examine-media-freedom-and-independent-journalism/), September 23, 2025, <https://ipi.media/bulgaria-mission-to-examine-media-freedom-and-independent-journalism/>

<sup>2</sup> Bulgaria: Press freedom undermined by political polarisation and delayed reforms, [ipi.media](https://ipi.media/bulgaria-mission/), September 26, 2025, <https://ipi.media/bulgaria-mission/>

<sup>3</sup> Bulgaria: Fragile Media Freedom Progress at Risk of Backsliding Without Urgent Reform, [ipi.media](https://ipi.media), October 31, 2025, <https://ipi.media/wp-content/uploads/2025/10/MFRR-Bulgaria-Report-2025-2.pdf>

<sup>4</sup> See <https://ipi.media/wp-content/uploads/2025/10/MFRR-Bulgaria-Report-2025-2.pdf>

<sup>5</sup> Bulgaria's parliament approves new government to end months of coalition talks, Reuters, January 16, 2025, <https://www.reuters.com/world/europe/bulgarias-parliament-approves-new-government-end-months-coalition-talks-2025-01-16/>

<sup>6</sup> Затвор за журналисти се движи по бърза писта в Народното събрание (Prison for journalists moves on fast track in Parliament), [AEJ-Bulgaria](https://www.borjane.com), October 9, 2025, <https://www.borjane.com>

media and international<sup>7</sup> watchdogs, who warned that the changes would effectively censor investigative journalism and pose a serious threat to freedom of expression, the changes were dropped on.

The prolonged political instability had hindered meaningful progress towards improving the country's media landscape. This has resulted in the stalling of efforts to enhance media independence and transparency, as well as the legal framework. During the latest elections in October 2024, local and international media freedom organisations documented four cases of attacks against journalists covering the vote, including threats and intimations from public officials.<sup>8</sup>

While there have been some encouraging developments, the lack of judicial reform in Bulgaria is contributing to the ongoing issue of vexatious lawsuits, or SLAPPs, which are often used to target investigative journalists and independent media outlets. The country's entrenched issues with high-level corruption, combined with close ties between political and business interests, have created an environment where local oligarchs maintain significant direct and indirect control over the media landscape, stifling the growth of independent and critical journalism. As a result, public trust in the media is steadily eroding, with many citizens perceiving the press as compromised by powerful interests.<sup>9</sup> This loss of trust creates fertile ground for the spread of disinformation and propaganda, further polarising society.

## Independence of media regulators

The Council for Electronic Media (CEM) is Bulgaria's media regulator and is legally required to operate independently from the state. However, the organisation has been the subject of criticism for what is perceived to be a lack of impartiality and a failure to act in the public interest. CEM members are appointed by Parliament and the President, with the law providing financial autonomy. Nevertheless, concerns persist regarding the transparency of these appointments, with a perception that political loyalty may sometimes supersede professional expertise. Ongoing controversies have further damaged CEM's fragile reputation. Insufficient funding and staffing have also undermined the independence and normal operations of the organisation, even as its mandate is due to expand. It has been reported that non-media regulatory bodies have been used to exert pressure on independent and investigative outlets that are critical of the government.

**Legislation in line with EMFA provisions: Yes**  
**Effective independence: No**

## Independence of public service media

The legal framework in Bulgaria provides safeguards for editorial independence and

<sup>7</sup> Bulgaria wants to criminalise alleged privacy violations, European Federation of Journalists, October 9, 2025, <https://europeanjournalists.org/blog/2025/10/09/bulgaria-wants-to-criminalise-alleged-privacy-violations/>

<sup>8</sup> Bulgaria: Press freedom organisations condemn attacks on journalists during parliamentary elections, ipi.media, November 6, 2024, <https://ipi.media/attacks-on-journalists-during-bulgarias-parliamentary-elections/>

<sup>9</sup> Digital News Report 2025, Bulgaria, Reuters Institute for Study of Journalism, Lada T. Price, June 17, 2025 <https://reutersinstitute.politics.ox.ac.uk/digital-news-report/2025/bulgaria>

pluralism in public broadcasters. However, there are still significant challenges to be addressed in practice. Since the fall of communism in 1989, Bulgarian National Television (BNT) and Bulgarian National Radio (BNR) have faced significant challenges, including politicisation, censorship and financial instability.

Despite legal efforts to ensure the transparency of the appointment and dismissal of public media governing bodies, including their directors, the processes remain flawed and subject to political pressure. In addition to governance issues, ongoing political interference, funding shortages and lack of transparency, there are further obstacles to the independence of public broadcasters. The development of multiple legislative bills to provide sustainable funding to the broadcasters have not been transferred to the parliament by successive administrations. It is unclear whether the draft bill on BNT being prepared by the working group includes provisions on sustainable funding or changes to management structure or independence. Given the ongoing challenges to CEM's credibility, the autonomy of BNT and BNR is further eroded, underscoring the need for robust, transparent safeguards to prevent attempts to exert political pressure.

**Legislation in line with EMFA provisions: Partially**

**Effective independence: No**

### **Misuse of state funds to influence media output**

On paper, Bulgarian legislation requires that public funds be distributed transparently and competitively. However, there are currently no specific legal requirements for state institutions to initiate public procurement processes when allocating advertising funds to media outlets. The absence of explicit regulations governing the allocation of public funds to the media sector permits non-transparent practices. In Bulgaria's small and vulnerable media market, where press freedom is constantly under threat, state advertising has become a tool for political influence, effectively buying favourable coverage. This is a long-standing concern for regional outlets, which are more susceptible to financial and political pressures from local authorities. At present, Bulgaria does not have a national regulatory body to oversee the allocation of state advertising funds to the media. This makes it challenging to monitor public spending and raises concerns about the misuse of these resources to influence media content.

**Legislation in line with EMFA provisions: No**

**Fair and transparent allocation of state funds to media: No**

### **Media pluralism and political/state influence over news media**

While Bulgarian law mandates that media service providers reveal their ownership structure, many media outlets have not yet complied with this requirement and have not disclosed their beneficial owners. The lack of resources available to enforcement authorities means that the regulations cannot be applied effectively and that meaningful penalties cannot be imposed. This has resulted in a longstanding lack of transparency regarding media ownership, especially in the online media market, where political influence over news websites is high.

This situation increases the risk of concentrated ownership, making media outlets more vulnerable to political and economic dependencies. Recent acquisitions have led to further consolidation of control of Bulgaria's media landscape, with two large conglomerates now owning major assets across television, online media, and telecommunications. In light of the dominant role that television plays as a primary news source, such concentration poses a significant threat to editorial independence. Although the market appears vibrant and congested, media pluralism in Bulgaria remains limited and there is a lack of watchdog and public interest journalism.

**Legislation in line with EMFA provisions: No**  
**Effective media pluralism: No**

## Analysis

### Independence of media regulators

*This section discusses how Article 30 of the AVMSD (Directive 2010/13/EU) is implemented.*

#### Summary

The Council for Electronic Media (CEM), Bulgaria's media regulator, is legally required to operate independently from the government. However, it has been the subject of criticism for failing to act in the public interest. The media regulator is perceived as being unduly influenced by political considerations. CEM members are selected by both the Parliament and the President, with the law granting the body financial autonomy. However, concerns have been raised regarding the transparency of the selection process, and that political loyalty may be a driving factor in appointments, rather than relevant expertise.

A series of controversies have called into question the integrity of CEM, eroding its already fragile reputation. Furthermore, insufficient funding and personnel resources jeopardise the regulator's autonomy, further complicating its capacity to fulfil its mandate. Over the years, non-media regulators have also been used as a means of penalising independent media outlets, in order to exert pressure on those that publish inconvenient or investigative material.

In response to questions regarding the implementation of the EMFA in Bulgaria, CEM stated that it had identified several areas requiring new or additional national regulations to ensure alignment with the EMFA. These include provisions related to pluralistic content (Article 3), the protection of journalistic sources (Article 4), guarantees for the independence of public service media (Article 5), transparency of media ownership and financing (Article 6), enhanced powers and capacity for the media regulator (Article 7), the assessment of media market concentration (Articles 22–23), transparency of audience measurement (Article 24), and the fair distribution of state advertising (Article 25), among others. “With regard to the new responsibilities that will be assigned to CEM, it is clear that the regulator’s capacity will need to be significantly strengthened. This will

require additional financial, technical, and human resources to ensure effective implementation,” the regulator said in an email to the author of this report.

### **Legal and operational independence**

The Council for Electronic Media (CEM) is the regulatory authority responsible for overseeing the media industry. It was established in 2001 with the objective of regulating electronic media. The Radio and Television Act<sup>10</sup> provides the framework for CEM’s operations.

The media regulator is responsible for issuing licences for radio and television broadcasting, registering other media service providers, and monitoring the content of radio and television programs to ensure compliance with applicable laws and regulations, as well as to promote media pluralism and editorial independence and impartiality. CEM has the authority to impose sanctions on broadcasters for non-compliance with legal requirements, including fines, temporary suspension, or revocation of licences. In addition to its existing remit, since 2020 CEM has also been responsible for regulating online audiovisual platforms.

In accordance with the law, the body is required to maintain legal independence from the government. However, the appointment process and some of its decisions are perceived as lacking transparency, which has led to criticism that the regulator is politicised. The current rules regarding CEM composition could potentially lead to instances where CEM members are exposed to political influence and pressure from their political backers.

### **Composition of the regulator’s board**

The conditions and procedures for the appointment and dismissal of members of CEM are laid down in national law. CEM has five members, each serving a six-year term. Three members of the regulatory body are appointed by Parliament, while two are appointed by the President.

The Parliament is responsible for nominating CEM members every two years, while the President is responsible for nominating candidates every three years. CEM members elect a chairperson, who serves a one-year term.

The Radio and Television Act also specifies the criteria for selecting CEM members, which include a background in higher education and experience in fields such as broadcasting, communications, media, law, or economics, as well as the ability to demonstrate professional integrity.<sup>11</sup>

<sup>10</sup> Radio and Television Act, available online (in Bulgarian) at <https://lex.bg/bg/laws/ldoc/2134447616>.

<sup>11</sup> Radio and Television Act, Art. 25.

Any political party represented in Parliament may nominate representatives for the CEM. However, the winning candidates must secure the most votes, which requires support from the ruling party or the majority parties in Parliament. There are no legal requirements for representatives of the opposition or independent NGOs to be part of the CEM.

CEM members may be dismissed for a variety of reasons, including violations of the law, established cases of conflict of interest, or failure to fulfil their duties.<sup>12</sup> It is rare for CEM chairs to be dismissed, even in instances where concerns have been raised about their integrity, qualifications, or political affiliations. To date, the CEM has terminated the membership of two individuals following the discovery that they had collaborated with the secret police during the communist era.<sup>13</sup>

While the law outlines procedures to ensure the independence and accountability of the media authority, there are few safeguards in place to guarantee its independence in practice.

## Independence of the regulator's members

As set forth in the Radio and Television Act<sup>14</sup>, CEM's independence is legally enshrined. CEM and its members must not accept instructions from any other body or institution regarding the exercise of their powers. The law stipulates that the regulator must “exercise its powers impartially and transparently, and in accordance with the objectives of Directive 2010/13/EC, as amended by Directive 2010/13/EC 2018/1808.”<sup>15</sup>

In carrying out its duties, the regulator must act in the public interest, protect freedom of speech, ensure the independence of providers of media services, promote media pluralism, safeguard cultural and linguistic diversity, protect users, and promote fair competition.

However, in reality, the regulator is highly politicised. Over the years, many of its members have maintained links with political groups or have worked for government bodies. To illustrate, Betina Zhoteva, a former chair of CEM, had a background in journalism but also served as a spokesperson and PR expert for multiple governments. This has led to questions about her political neutrality.

Some of CEM's former members have also made their mark through attacks on members of the press. The former head of the regulator, Sonya Momchilova, launched an attack on freelance journalist Maria Cheresheva<sup>16</sup> in late 2022 for her investigation into the abuse of migrants at the Bulgarian border.<sup>17</sup>

<sup>12</sup> Radio and Television Act, Art. 30.

<sup>13</sup> See more (in Bulgarian) at <https://www.cem.bg/infobg/4>.

<sup>14</sup> Radio and Television Act, Art. 20.

<sup>15</sup> Radio and Television Act, Art. 20, clause (2).

<sup>16</sup> Full disclosure: the author of this report works with Cheresheva at the Association of European Journalists in Bulgaria.

<sup>17</sup> “Това разследване кой ти го е правил” (Who did this investigation for you), Capital, 16 December 2022, [https://www.capital.bg/politika\\_i\\_ikonomika/sedmicata/mediina\\_sergia/2022/12/16/4428206\\_tova\\_razsledvane\\_koi\\_ti\\_go\\_e\\_pravil/](https://www.capital.bg/politika_i_ikonomika/sedmicata/mediina_sergia/2022/12/16/4428206_tova_razsledvane_koi_ti_go_e_pravil/)

The investigation, conducted by a team of international journalists, was criticised by Momchilova, who asserted, without substantiation, that the story did not meet the “basic journalistic standards” expected of such work. Two Bulgarian organisations have called for Momchilova’s dismissal.

In a 2023 interview, Momchilova cited reports of Russian atrocities in Bucha as an example of anti-Kremlin propaganda.<sup>18</sup> Her remarks prompted a swift and strong response from Ukraine’s embassy in Bulgaria, with the incident igniting public outrage and prompting numerous journalists to call for her resignation. Despite the negative reaction from some quarters, three of the five members of the CEM, including Momchilova, voted against her resignation.<sup>19</sup> A subsequent statement from CEM condemned the violence in Bucha, describing it as a “monstrous act of torture”.<sup>20</sup>

Further controversy surrounded CEM in 2022 when a small populist party, then part of Prime Minister Kiril Petkov’s coalition government, nominated journalist Martin Karbovski for a position on the media regulator.<sup>21</sup> Karbovski, who has a reputation for disseminating misinformation on social media, prompted a strong negative reaction from Bulgaria’s journalistic community, which ultimately led him to withdraw his candidacy. Following the expiration of the previous chairperson’s mandate in September 2024, the body operated under temporary acting heads until April 2025, when a new chair was finally elected for a one-year term.

## Financial autonomy

CEM’s allocated budget in 2025 is approximately BGN 3.4 million (€1.7 million).<sup>22</sup> Of this amount, approximately 75% is allocated to employee remuneration. CEM members and analysts alike have highlighted that the regulator’s budget is inadequate to guarantee the effectiveness and independence of the media regulator. The funding is intended to cover administrative costs, activities related to media regulation, and to ensure the authority’s independent operation.

However, given the limited remuneration and the politicisation of the regulator, it might prove challenging to hire qualified and experienced experts in the field of media monitoring and regulation.

While the budget for CEM is not specified in the Radio and Television Act, it is included in the state budget and approved by Parliament. The remuneration of CEM members is set out in the Radio and Television Act.<sup>23</sup> In addition to the five members of CEM, the

<sup>18</sup> Andy Heil, “Bulgarian Media Watchdog Equated Bucha Killings With Anti-Russian ‘Propaganda’”, Radio Free Europe/Radio Liberty, 27 June 2023, <https://www.rferl.org/a/bulgaria-media-regulator-bucha-propaganda-russia/32477929.html>

<sup>19</sup> “Излъчениите от ГЕРБ и Радев членове на CEM подкрепиха Соня Момчилова” (The members of CEM nominated by GERB and Radev supported Sonia Momchilova), Zaistinata.com, 7 May 2023, <https://tinyurl.com/ycyzsr3j>.

<sup>20</sup> CEM’s statement about Ukraine, available online at <https://www.cem.bg/displaynewsbg/903>.

<sup>21</sup> “ИТН предлага Мартин Карбовски за член на CEM” (ITN proposes Martin Karbovski as a member of CEM), Segabg, 13 April 2022, <https://www.segabg.com/hot/category-media/itn-predlaga-martin-karbovski-za-chlen-na-sem>.

<sup>22</sup> Бюджет за 2025 (The 2025 Budget), available online at [https://www.cem.bg/files/1743513285\\_byudzheta\\_na\\_saveta\\_za\\_elektronni\\_medii\\_za\\_2025\\_g.pdf](https://www.cem.bg/files/1743513285_byudzheta_na_saveta_za_elektronni_medii_za_2025_g.pdf)

<sup>23</sup> Radio and Television Act, Art. 41.

regulator employed a total of 50 administrative staff last year, with a dozen vacancies.<sup>24</sup>

CEM's annual budget is publicly available, and the regulator publishes regular reports on its financial expenditure<sup>25</sup>, as well as annual budget reports. Over the past few years, the budget of CEM has remained relatively constant. However, members of the organisation have highlighted that the funding is insufficient. Moreover, Bulgaria failed to ratify a provision in the AVMSD which stipulates that states should ensure that "national regulatory authorities or bodies have adequate financial and human resources and enforcement powers to carry out their functions effectively".<sup>26</sup>

## Tasks and accountability

The competencies and powers of the CEM are clearly defined by the relevant legislation. The CEM is responsible for regulating electronic media, issuing licences, appointing the director general and board members of public broadcasters, and ensuring compliance with media laws and standards. The legal framework outlines the CEM's powers in detail, including its ability to impose sanctions for violations.<sup>27</sup>

The law also clearly states the accountability mechanisms. The CEM is required to operate transparently, submit annual reports to the Parliament, and adhere to rules designed to maintain its independence and accountability to the public. CEM's sessions are open to the general public. A comprehensive archive of CEM's statements and decisions, along with detailed meeting minutes from their hearings, is publicly accessible on their website.<sup>28</sup>

## Appeal mechanisms

CEM's decisions are subject to judicial review, and affected parties have the right to appeal these decisions before the Administrative Court in Sofia District. This provides a legal avenue for the oversight of CEM's regulatory actions, including the appointment of directors of two public broadcasters, thereby ensuring that its decisions are in accordance with the law.

In 2023, CEM issued 142 decisions, of which two have been appealed in court, according to the information provided in its annual report.<sup>29</sup> At the time of writing, no information was available regarding the outcome of the court proceedings. Furthermore, CEM issued 22 penalty notices for violations of the Radio and Television Act, 19 of which have been appealed in court. As of December 2023, there were 26 legal proceedings pending. In the previous year, Bulgarian courts reached decisions on 22 cases of appeal against CEM on decisions issued between 2020 and 2023. Of these, 15 were upheld, two were amended, and five were revoked.

<sup>24</sup> CEM, Annual Report 2023, cit.

<sup>25</sup> See more (in Bulgarian) at <https://www.cem.bg/activitiesbg/16>.

<sup>26</sup> "Изменение на Закона за радиото и телевизията: къде е чл.30, параграф 4 от Директива (ЕС) 2018/1808" (Amendments to the Radio and Television Act: where is Article 30, paragraph 4 of Directive (EU) 2018/1808?), nellyo.wordpress.com, December 10, 2020, <https://nellyo.wordpress.com/2020/12/10/30-4-dir2018-1808/>

<sup>27</sup> Radio and Television Act, Art. 32.

<sup>28</sup> See (in Bulgarian) <https://www.cem.bg/activitiesbg/13>.

<sup>29</sup> CEM, Annual Report 2023, cit.

## Power to request information

CEM is duly authorised to request information and data from other state bodies and institutions, as well as legal entities, in order to fulfil its regulatory remit.

## Independent monitoring of the regulator's activity

There is no independent or parliamentary report on the activity of CEM, with the exception of the annual report drafted and submitted by CEM to Bulgarian lawmakers.

## Independence of public service media

*This section discusses how Article 5 of the EMFA is implemented.*

### Summary

The legal framework provides safeguards to ensure editorial independence and pluralism for public broadcasters in Bulgaria. However, there are still significant practical challenges to be overcome in order to achieve true autonomy. Since the fall of communism in 1989, Bulgarian National Television (BNT) and Bulgarian National Radio (BNR) have faced challenges in maintaining editorial freedom while navigating political pressure, censorship, and financial instability. Despite efforts to ensure the appointment and dismissal of the public service media leaders are free from political influence, these processes remain susceptible to flaws.

In addition to these governance issues, political influence, lack of funding, and transparency problems continue to impede the genuine independence of public service media. As CEM's independence has often been called into question, the credibility of BNT and BNR is further eroded, underscoring the need for more robust, transparent mechanisms to safeguard their editorial autonomy. The CEM is responsible for appointing the heads of public broadcasters.

## Editorial and operational independence

Although the Radio and Television Act does not explicitly mention the independence of public service broadcasters, it includes safeguards that guarantee the independence of media service providers in general from “political and economic interference” and “censoring of media service in any shape or form”.<sup>30</sup> Furthermore, the legislation stipulates that journalists employed by media service providers are prohibited from receiving instructions or directions regarding the performance of their duties from individuals or groups external to the management bodies of the media service providers. Additionally, it states that public criticism of media service providers by employees should not be regarded as disloyalty to the employer.<sup>31</sup>

<sup>30</sup> Radio and Television Act, Art. 5.

<sup>31</sup> Radio and Television Act, Art. 11, clauses (2) and (3).

In addition, the respective editorial guidelines at BNT and BNR address this matter. “The journalists and creative professionals at BNT are not permitted to accept instructions or guidelines regarding journalistic content and the fulfilment of their duties from individuals or groups external to the governing bodies of BNT.”<sup>32</sup>

Despite these provisions, the legislation does not provide sufficient safeguards to protect the independence of the public service broadcasters and prevent political and government interference in their editorial policy.

For example, the appointment of Emil Koshlukov as the head of BNT prompted criticism regarding his qualifications and alleged political ties. Prior to his appointment, he had worked for Alfa TV, a private channel associated with a far-right politician.<sup>33</sup> His tenure has been marked by public demonstrations in which the BNT has been accused of presenting biased news coverage.

In a separate development, in 2019, CEM dismissed the head of BNR, Svetoslav Kostov, following an unprecedented five-hour broadcast suspension.<sup>34</sup> Official justifications were provided, citing technical issues. However, the timing of the suspension, occurring immediately following plans to cancel a prominent journalist's programme, prompted public speculation regarding the potential influence of political factors.

The 2025 Bulgaria country report published by the Centre for Media Pluralism and Media Freedom<sup>35</sup> identifies a medium to high risk to the independence of public service media in the country and recommends regulatory changes to strengthen the independence and funding of the public broadcasters.

In 2023, the Bulgarian government announced its intention to consider amendments to the Radio and Television Act that would affect the public service media providers.<sup>36</sup> Nevertheless, no legal amendments have yet been enacted.

## Legal provisions guaranteeing plurality of information

In accordance with the Radio and Television Act, public service media outlets are required to provide their audiences with a diversity of perspectives and information sources. The law requires that public broadcasters present news and current affairs content in a balanced manner, ensuring that all significant points of view are represented, particularly in matters of political, economic, or cultural significance.

<sup>32</sup> Editorial Guidelines of Bulgarian National Television. See more at: <https://p.bnt.bg/p/r/pravilnik-redakcionna-deinost-2011-522.pdf>.

<sup>33</sup> “Broadcast regulator elects Koshlukov as director-general of Bulgarian National Television”, The Sofia Globe, 5 July 2019, <https://sofiaglobe.com/2019/07/05/broadcast-regulator-elects-koshlukov-as-director-general-of-bulgarian-national-television/>.

<sup>34</sup> “Media regulator fires Svetoslav Kostov as head of Bulgarian National Radio”, The Sofia Globe, 17 October 2019, <https://sofiaglobe.com/2019/10/17/media-regulator-fires-svetoslav-kostov-as-head-of-bulgarian-national-radio/>.

<sup>35</sup> Orlin Spassov, Nelly Ognyanova, Nikoleta Daskalova, “Monitoring media pluralism in the digital era. Country Report: Bulgaria”, June 2025, Centre for Media Pluralism and Media Freedom, available online at <https://cadmus.eui.eu/entities/publication/2678c025-5406-4111-8395-bb4d499a63f0>

<sup>36</sup> The bill was tabled in 2021 but included in the Parliament’s agenda in 2023, available online at <https://www.parliament.bg/bg/bills/ID/163525>

BNT and BNR should reflect the different ideas and beliefs in society through a plurality of viewpoints in each of the news and current affairs programmes covering political and economic topics. They should also “promote mutual understanding and tolerance in relations between people” and popularise “Bulgarian culture and the Bulgarian language, as well as the culture and language of citizens in accordance with their ethnic affiliation.”<sup>37</sup> The programmes of public broadcasters are made available free of charge to all Bulgarian citizens.

### ***Governance bodies: composition and appointment***

The Radio and Television Act sets out the processes for appointing and removing the members of the management boards of public media. CEM is responsible for the appointment and dismissal of the heads of public media.<sup>38</sup> The selection process for these roles is aligned with the criteria used for appointing CEM members, including professional experience and qualifications in the media sector. Furthermore, the heads of BNT and BNR must have a minimum of five years' experience in television or radio, respectively.<sup>39</sup>

The management boards of BNT and BNR comprise five members each, appointed by CEM following nominations from the respective heads of public broadcasters. The term of office is three years.<sup>40</sup>

While CEM's stated intention is to ensure transparency and independence in the appointment process, concerns about politicisation within the regulator have raised similar doubts regarding the political influence over public media.

Although CEM's decision-making procedures appear transparent, its actions have at times sparked controversy. For example, the appointment of a new director of BNT has been repeatedly delayed since 2022, when legal disputes<sup>41</sup> undermined the outcome of the competition organised by CEM. As a result, Emil Koshlukov, the incumbent director, has remained in office despite his term having expired three years ago. Although the Supreme Administrative Court issued a final ruling in June 2025<sup>42</sup> requiring the procedure to be re-launched, the selection process has yet to conclude.

Tensions between CEM and Koshlukov escalated in September 2025, when the regulator issued a statement<sup>43</sup> regarding a letter Koshlukov had sent about the legal appeal. CEM described the letter's tone as “extremely sharp, threatening, and aggressive,”<sup>44</sup> noting that

<sup>37</sup> Radio and Television Act, Art. 6.

<sup>38</sup> Radio and Television Act, Art. 32, clause 2.

<sup>39</sup> Radio and Television Act, Art. 66, clause 1.

<sup>40</sup> Radio and Television Act, Art. 58, clause 1, and Art. 60, clause 1.

<sup>41</sup> Svetoslav Spasov, “Съдебното дело, което крепи Кошлуков в БНТ, ще рестартира след 7 месеца” (The court case that supports Koshlukov in BNT will restart after 7 months), Sega, 25 November 2023, <https://www.segabg.com/hot/category-media/sudebnoto-delo-koeto-krepi-koshlukov-bnt-shte-restartira-sled-7-meseca>.

<sup>42</sup> Vidka Atanasova, “След съдебна намеса. Кошлуков остава шеф на БНТ незначайно докога” (After court intervention: Koshlukov remains head of BNT indefinitely), RFE, August 5, 2025, <https://www.svobodnaevropa.bg/a/emil-koshlukov-bnt/33494068.html>

<sup>43</sup> See Позиция на CEM по повод писмо от Емил Кошлуков (CEM's Statement on a Letter by Emil Koshlukov), CEM, September 11, 2025, <https://www.cem.bg/displaynewsbg/1062>

<sup>44</sup> Емил Кошлуков към CEM: Спрете фарса (Emil Koshlukov to CEM: Stop the farce), BNT, September 12, 2025, <https://bntnews.bg/news/emil-koshlukov-kam-sem-sprete-farsa-1355506news.html>

Koshlukov threatened to involve the police, the prosecution, and even a private bailiff to enforce sanctions and fines if CEM did not comply with recent court decisions. Some media observers condemned his actions, while Koshlukov dismissed the statement as “arrogant” and labelled the regulator “obsolete, useless, and dangerous.”<sup>45</sup>

Experts warn that the prolonged legal battle and ongoing interim leadership further undermine confidence in BNT’s independence. In November 2024, the sudden departure of Daniel Chipev, executive news producer, coupled with the lack of transparency surrounding the decision, raised concerns about potential political interference. The Association of European Journalists<sup>46</sup> urged BNT’s management to clarify the case, noting that the lack of transparency fuels suspicion of undue pressure. Some media reports<sup>47</sup> suggested that Chipev had been dismissed after airing election-related news critical of two major parties, while dozens of BNT journalists launched a petition in his support.<sup>48</sup>

There are no legal provisions or established practices that require the inclusion of representatives from the political opposition or independent NGOs in the management of public service media. Appointments are typically made on the basis of professional qualifications as determined by CEM. However, there is currently no formal mechanism in place to ensure representation from a diverse range of political or civil society backgrounds.

The current composition of the management boards of the two broadcasters includes representatives from outside the field of journalism and communications.

The dismissal of the BNT and BNR directors is carried out in accordance with the same legal grounds as the dismissal of CEM members. This can occur for a range of reasons, including instances of “severe or systematic violations” of the law.<sup>49</sup> However, the absence of comprehensive procedural safeguards may permit subjective interpretations of the law, which could potentially compromise the independence of public broadcasters.

The aforementioned provisions are intended to ensure a certain degree of independence, although they are not entirely free from political influence. While the Radio and Television Act provides a framework for appointing the heads and management boards of BNT and BNR, it does not explicitly require that these processes be fully transparent, open, and non-discriminatory.

CEM schedules public hearings of the candidates who have applied to lead BNT and BNR, which are broadcast live on one of the BNT and BNR programmes, respectively.

<sup>45</sup> Емил Кошлуков към Спрете фарса (Emil Koshlukov to CEM: Stop the farce), BNT, September 12, 2025, <https://bntnews.bg/news/emil-koshlukov-kam-sem-sprete-farsa-1355506news.html>

<sup>46</sup> “Ръководството на БНТ следва да даде обяснение по казуса с Даниел Чипев” (The management of BNT should provide an explanation on the case with Daniel Chipev), AEJ-Bulgaria, 24 November 2024, <https://aej-bulgaria.org/27-11-2024/>

<sup>47</sup> БНТ съобщи за парите за общини на Пеевски и Борисов и последва оставка. Какво стана с Даниел Чипев (BNT reported on Pееvski and Borisov’s money for municipalities and a resignation followed. What happened to Daniel Chipev?), RFE, November 22, 2024, <https://www.svobodnaevropa.bg/a/kak-bnt-sabshti-za-parite-kam-obshtini-na-peeviski-i-borisov-i-posledva-ostavka/33211904.html>

<sup>48</sup> See “Ръководството на БНТ следва да даде обяснение по казуса с Даниел Чипев” (The management of BNT should provide an explanation on the case with Daniel Chipev), AEJ-Bulgaria, 24 November 2024, <https://aej-bulgaria.org/27-11-2024/>

<sup>49</sup> Radio and Television Act, Art. 67, clause 2.

CEM makes the selection rules, candidate visions for the future development of BNT<sup>51</sup> and BNR<sup>52</sup>, and transcripts of the hearings available on its website. However, this transparent procedure offers limited assurance regarding the qualifications, integrity, or independence of the applicants.

### ***Governance bodies: term***

The tenure of the heads of public broadcasters is three years. The maximum number of consecutive terms that may be served is two. The management boards of BNT and BNR each comprise five members, appointed by CEM following nominations from the respective heads of public broadcasters. The term for these roles is also three years.

The term of office for Bulgarian lawmakers is five years.

### ***Governance bodies: dismissal conditions***

The dismissal of members of the management board of public service media providers may be initiated by their heads upon the provision of legally sound grounds for such action, subject to approval by CEM.<sup>53</sup> CEM has the authority to dismiss the heads of the two broadcasters.

All decisions made by CEM, including those pertaining to the dismissal of heads of the broadcasters, are subject to judicial review.

## **Funding**

The funding of BNT and BNR is derived from three main sources: the state budget, advertising revenues, and other commercial activities. In accordance with the Radio and Television Act<sup>54</sup>, state subsidies are to be allocated for the purpose of covering the basic public service tasks, including the preparation, development and distribution of national and regional programmes.<sup>55</sup> However, the criteria for the allocation of state funding are not fully defined in the legislation.

Bulgaria's public service broadcasters are permitted to broadcast commercial advertisements, and the prices are listed on their respective websites.<sup>56</sup> for BNT and for BNR. The two media providers disclose their income from commercial advertising in their annual financial reports.

<sup>51</sup> See (in Bulgarian) [https://cem.bg/files/1655980790\\_pravila\\_izslushvane\\_bnt\\_2022.pdf](https://cem.bg/files/1655980790_pravila_izslushvane_bnt_2022.pdf).

<sup>52</sup> See (in Bulgarian) [https://cem.bg/files/1634118784\\_pravila\\_izslushvane\\_bnr\\_2021.pdf](https://cem.bg/files/1634118784_pravila_izslushvane_bnr_2021.pdf).

<sup>53</sup> Radio and Television Act, Art. 59.

<sup>54</sup> Radio and Television Act, Art. 70.

<sup>55</sup> Radio and Television Act, Art. 70, clause 4.

<sup>56</sup> See prices for BNT at <https://bnt.bg/reklama-91pages.html> and for BNR at <https://bnr.bg/aboutbnr/page/advertisement>.

In 2025, the state provided BNT with BNG 93.6 million (€46.8 million) and BNR with around BNG 66 million (€33 million), up from nearly BGN 87 million (€43.5 million) to BNT and BGN nearly 63 million (€31.5 million) to BNR in 2024.<sup>57</sup>

Despite an increase in state funding in recent years, media experts and heads of public broadcasters have voiced concerns that the financial resources remain insufficient.<sup>58</sup> This could potentially impact their editorial independence. Furthermore, given that the state provides a substantial portion of their budgets, there is a risk that the government may exert undue influence over the public media through the use of funding as a political tool.

## Independent monitoring mechanisms

There is no separate, fully independent body with the sole responsibility of overseeing the editorial independence of public media. CEM is the primary regulatory authority responsible for monitoring public service media, ensuring compliance with the Radio and Television Act, and upholding standards of media pluralism and independence. CEM also plays a key role in overseeing the plurality of information and opinions in the media. In light of concerns about its politicisation, there is currently no independent authority or body with sole responsibility for that task.

There have been instances where the programmes or editorial practices of public broadcasters have not met the standards expected of them in the journalistic field. CEM's decisions are published on the regulator's website.<sup>59</sup>

CEM is also the main regulatory authority responsible for appointing and dismissing the head of management or members of the management board of public media. While CEM files an annual report about its activities to Parliament, there is no oversight of the appointment and dismissal procedures.

Bulgaria currently lacks a dedicated, independent body with the specific mandate of overseeing the funding procedures of public service media providers in a manner that ensures transparency and independence from political influence. While CEM fulfils a regulatory function, it does not have the remit to provide financial oversight.

<sup>57</sup> Desislava Antova, Парламентът прие на второ четене бюджетите на БНТ, БНР и БТА за 2025 г. (The Parliament adopted the budgets of BNT, BNR and BTA for 2025 on second reading), BTA, March 23, 2025, <https://www.bta.bg/bg/news/bulgaria/856036-parlamentat-prie-na-vtoro-chetene-byudzhete-na-bnt-bnr-i-bta-za-2025-g>.

<sup>58</sup> Maria Kostova, "CEM пише на ЕК заради намалените бюджети на обществените медии" (CEM writes to the EC because of the reduced budgets of public media), BNR, 10 May 2021, <https://bnr.bg/horizont/post/101465031/sem-shte-izbira-predsedatel>; Maria Kostova, "Александър Велев: Бюджетът за БНР за 2019 година е крайно недостатъчен" (Alexander Veleв: BNR's 2019 budget is extremely insufficient), BNR, 1 November 2018, <https://bnr.bg/sr/post/101039706/aleksandar-velev-budjetat-za-bnr-za-2019-godina-e-kraino-nedostatachen>; Lora Fileva, "Кой ще управлява "компанията": Съветът за електронни медии гласува новия шеф на БНТ" (Who will run the 'company': The Electronic Media Council appoints the new head of BNT), Dnevnik, 29 June 2022, [https://m.dnevnik.bg/bulgaria/2022/06/29/4363479\\_koi\\_shte\\_upravliava\\_kompaniata\\_suvelut\\_za\\_elektronni/](https://m.dnevnik.bg/bulgaria/2022/06/29/4363479_koi_shte_upravliava_kompaniata_suvelut_za_elektronni/); Maria Kostova, "Комисията по културата и медиите одобри проектобюджета за 2023 година" (The Committee on Culture and Media approved the 2023 draft budget), BNR, 7 November 2023, <https://bnr.bg/post/101849939/komisiata-po-kulturata-i-mediite-odobri-proektobudjeta-za-2023-godina>.

<sup>59</sup> CEM's decisions are available online at <https://www.cem.bg/actsbg/12>.

The National Audit Office<sup>60</sup> is responsible for monitoring the implementation and expenditure of state funds, including those of the two public broadcasters. The National Audit Office makes its audit reports available to the public.

## Misuse of state funds to influence media output

*This section discusses how Article 25 of the EMFA is implemented.*

### Summary

Bulgarian legislation provides a legal framework for the distribution of public funds, requiring that tenders be awarded in a transparent, competitive, and non-discriminatory manner. While this applies across all sectors, including the media, there are no specific legal requirements for state institutions to launch public procurement processes when allocating advertising or other funds to media outlets. While there has been some progress, public funds are often distributed through intermediaries or direct contracts with media outlets, bypassing competitive procedures.

In 2023 law changes introduced some transparency when institutions allocate state advertising to broadcasters through public procurement of over 5.000 euros. The absence of more explicit regulations governing the allocation of public advertising to media allows for the potential for non-transparent practices. In Bulgaria's small and vulnerable media market, where press freedom is under constant threat, state advertising has become a means of exercising political influence, effectively purchasing favourable media coverage. This has been a matter of concern for some time, with questions being raised about the use of public funds to exert political control over the media. The situation is especially challenging for regional outlets, which are particularly vulnerable to financial and political pressures.

At present, Bulgaria does not have a national regulatory authority or any other independent body responsible for overseeing the allocation of state advertising funds to media outlets. The lack of oversight makes it challenging to monitor the expenditure of state advertising, which further raises concerns about the potential misuse of public resources to influence media content.

### State funding spending: legal provisions, criteria for distribution and tender procedures

While the general legal framework governing the distribution of public funds is set out in the Public Procurement Act<sup>61</sup>, the law does not explicitly regulate the allocation of public funds to a wide range of media outlets. The absence of precise regulation increases opacity and increases the likelihood of preferential treatment for media outlets aligned with the government.

<sup>60</sup> See more at <https://www.bulnao.government.bg/en/>.

<sup>61</sup> Public Procurement Act, available online (in Bulgarian) at <https://lex.bg/laws/ldoc/2136735703>.

The Public Procurement Act provides the overarching legal framework designed to guarantee that public contracts are awarded in a transparent, competitive and non-discriminatory manner with clear criteria. The Act applies to all sectors, including the media. The law does not apply to “purchase of air time or provision of programmes which are commissioned to media service providers”.<sup>62</sup> However, there are no specific requirements for state institutions and authorities to launch public procurement when allocating funds or advertising to media outlets.

The current legislation does not provide explicit guidance and criteria on the allocation of public funds to media service providers, leaving open the possibility for discretion in the distribution of these funds. It is not uncommon for authorities to allocate advertising or funding to publications without a public tender.<sup>63</sup> Instead, contracts are signed directly with media outlets or through intermediaries such as media agencies.<sup>64</sup> Such contracts are often regarded as confidential and therefore not accessible to the public.

Despite the provisions of the Access to Public Information Act<sup>65</sup>, many authorities continue to refuse information when journalists inquire about public funds spent on media services or advertising. Over time, the government has granted funding to media outlets that are willing to align themselves with the administration or specific political parties.

Such opaque practices not only distort the media market but are also used as a tool to influence editorial independence. Many publications are dependent on state advertising, and therefore susceptible to undue influence in exchange for favourable coverage. It is not uncommon for paid content and advertorials to be presented in a manner that does not clearly distinguish them from genuine news reporting.<sup>66</sup> In the past, instances have occurred where state and EU funding has been used to influence the media and benefit certain outlets, despite the fact that these outlets have violated basic ethical standards. Outside of the capital, the situation is even more problematic, with city governments using public funding to favour friendly media outlets.<sup>67</sup>

<sup>62</sup> Public Procurement Act, Art. 13, clause 5.

<sup>63</sup> Maria Manolova, “Направи ме известен” (Make me famous), Capital, 6 July 2013, [https://www.capital.bg/biznes/media\\_i\\_reklama/2013/07/06/2097790\\_napravi\\_me\\_izvesten/](https://www.capital.bg/biznes/media_i_reklama/2013/07/06/2097790_napravi_me_izvesten/); Ilia Valkov, “Властта е дала над 58 млн. лв. на медиите за 12 години” (The government has given more than BGN 58 million to the media over 12 years), Clubz.bg, 9 July 2019, <https://clubz.bg/85163-vlastta-e-dala-nad-58-mln-lv-na-mediite-za-12-godini>; Spas Spasov, “Регионалната журналистика в България се продава евтино и се купува масово” (Regional journalism in Bulgaria is sold cheaply and bought en masse), Dnevnik, 25 March 2016, [https://www.dnevnik.bg/bulgaria/2016/03/25/2725257\\_regionalnata\\_jurnalistika\\_v\\_bulgariia\\_se\\_prodava/](https://www.dnevnik.bg/bulgaria/2016/03/25/2725257_regionalnata_jurnalistika_v_bulgariia_se_prodava/)

<sup>64</sup> Manolova, “Make me famous...”, cit.; Valkov, “The government has given more than BGN 58 million to the media...”, cit.; Spasov, “Regional journalism in Bulgaria is sold cheaply...”, cit.

<sup>65</sup> Access to Public Information Act, available online (in Bulgarian) at <https://lex.bg/laws/ldoc/2134929408>.

<sup>66</sup> Spas Spasov, “Regional journalism...”, cit.

<sup>67</sup> Spas Spasov, “Regional journalism...”, cit.

## Transparency of state media contracts

Bulgaria has been the subject of criticism for the lack of transparency in the allocation of state advertising to the media for a number of years. In response to repeated recommendations from the European Commission to enhance transparency in state advertising<sup>68</sup>, Bulgaria enacted certain incremental legal amendments in 2023.<sup>69</sup> In line with amendments to the Public Procurement Act, effective December 2023, Bulgarian institutions are required to disclose and make public the amount of funds paid to media service providers, where applicable. While these changes are seen as a step towards greater transparency, they do not include contracts under €5,000 and do not apply to funds allocated through intermediaries such as media agencies.<sup>70</sup> The EU's 2023 Rule of Law report<sup>71</sup> indicates that stakeholders view the overall situation regarding the allocation of state advertising as unchanged in practice.

Some experts<sup>72</sup> have expressed concern about the lack of detailed regulation on state advertising, calling for the necessary reforms to ensure transparency when allocating such funding.

The criteria for the distribution of state funds for advertising are made publicly available in advance by electronic and user-friendly means if the funds are distributed through a public tender. This approach is rarely selected by Bulgarian authorities. Similarly, the public expenditure for state advertising is publicly available in an electronic and user-friendly manner only if the funds are distributed through a public tender.

## Monitoring state advertising spending

There is currently no national regulatory authority or other body responsible for monitoring the allocation of state advertising expenditures to media service providers. Furthermore, there are no legal guarantees to ensure that national regulatory authorities or bodies may request additional information on the allocation of state advertising.

To date, there is no independent body or non-profit organisation that monitors state advertising spending on a consistent and regular basis. From time to time, journalistic investigations have attempted to provide greater transparency on the allocation of state advertising. Nevertheless, obtaining such information, particularly the total amount of funds spent, the names of the media outlets, and the specific services provided, is challenging. Many state institutions and authorities are reluctant to make the data publicly available.

<sup>68</sup> European Commission, "2024 Rule of Law Report Country Chapter on the rule of law situation in Bulgaria", 24 July 2021, [https://commission.europa.eu/document/download/fd6bb85d-4aaa-4c79-88a2-8709edfb2002\\_en?filename=10\\_1\\_58051\\_coun\\_chap\\_bulgaria\\_en.pdf](https://commission.europa.eu/document/download/fd6bb85d-4aaa-4c79-88a2-8709edfb2002_en?filename=10_1_58051_coun_chap_bulgaria_en.pdf), pp. 27-28.

<sup>69</sup> Amendments made to the Public Procurement Act and Tourism Act.

<sup>70</sup> Public Procurement Act, Art. 29, clause 2, item 4.

<sup>71</sup> European Commission, "2024 Rule of Law Report...", cit.

<sup>72</sup> Mirela Veselinova, Държавата не бива да сключва рекламни договори с медии, които не са осветили собственика си" (The state should not conclude advertising contracts with media that have not disclosed their owner), Capital, 9 May 2024, [https://www.capital.bg/politika\\_i\\_ikonomika/pravo/2024/05/09/4621345\\_durjavata\\_ne\\_biva\\_da\\_skljuchva\\_reklamni\\_dogovori\\_s/](https://www.capital.bg/politika_i_ikonomika/pravo/2024/05/09/4621345_durjavata_ne_biva_da_skljuchva_reklamni_dogovori_s/)

## Media pluralism and political/state influence over news media

*This section discusses how Articles 6 and 22 of the EMFA are implemented.*

### Summary

While Bulgaria has legal safeguards in place requiring media service providers to disclose ownership, many outlets fail to comply with these regulations. The authorities responsible for enforcement lack the necessary resources and capacity to ensure consistent application of the law or to impose appropriate penalties. As a result, there is a continued risk of media ownership concentration, which leaves outlets vulnerable to political and economic interference.

Despite the existing diversity of Bulgaria's media market, recent acquisitions have led to the emergence of two significant media conglomerates, which now control assets across television, online media, and telecommunications. In a country where television remains a dominant source of news, alongside online platforms, any attempts to control leading television channels pose a significant risk to editorial independence.

The intermingling of journalism and politics in Bulgaria has become increasingly apparent in recent instances of journalists entering the political arena, underscoring the intricate and frequently strained relationship between these two domains. The legislation does not explicitly prohibit politicians or political parties from owning broadcasting media outlets. Consequently, in contrast to the situation in many other countries in the region, several television stations in Bulgaria are openly affiliated with political parties.

### Transparency: legal requirements

#### **Media ownership**

The current legal framework requires but does not provide comprehensive assurance that media service providers make key information about their operations readily and directly accessible to the public.

All legal entities, including media outlets, are required to submit their legal names and contact information to the National Commercial Registry<sup>73</sup> or the Register of Non-Profit Legal Entities<sup>74</sup> databases. However, the information is not readily accessible to the public. Furthermore, the Radio and Television Act requires all media service providers, including registered radio and television providers disclose this information on their websites.<sup>75</sup> However, many media outlets do not provide the necessary information.

<sup>73</sup> See more at <https://portal.registryagency.bg/en/home-cr>.

<sup>74</sup> See more here: <https://portal.registryagency.bg/en/home-cr>.

<sup>75</sup> Radio and Television Act, Art. 5c and Art 7.

All print media are required to register with the Ministry of Culture in accordance with the relevant legislation.<sup>76</sup> While the legislation is designed to enhance transparency regarding media ownership, some publications have not provided the requisite information. Furthermore, the Ministry of Culture lacks the necessary resources and personnel to effectively oversee the implementation of the law or verify the provided information.

CEM also maintains a public register of ownership details for radio and television providers. In this context, it is notable that there is a close relationship between political parties and media companies. A number of television broadcasters are openly aligned with political groups, including Alfa TV, Skat TV, 7/8 TV, BSTV (which is currently not broadcasting), and Bulgaria 24.<sup>77</sup>

In a separate development, Petar Volgin, a radio presenter at BNR, took leave to pursue a candidacy for the 2024 European Parliamentary elections when he was elected as a representative of the far-right, pro-Russian Vazrazhdane party.<sup>78</sup> Volgin has been a controversial figure, frequently using his platform to echo Kremlin propaganda about the war in Ukraine and featuring pro-Russian figures, which has resulted in listener dissatisfaction and criticism from media experts who have demanded his resignation.

Similarly, in September 2023, the centre-right GERB party, led by former Prime Minister Boyko Borissov, announced the nomination of Anton Hekimyan, a well-known journalist and television host, as their candidate for the Sofia mayoral election.<sup>79</sup> The announcement was made just two days after Mr Hekimyan resigned from his position as head of news, current affairs and sports at bTV, one of Bulgaria's leading television channels. His sudden move into politics prompted questions about his suitability as a senior news executive.

### ***State funding***

There is no explicit legal requirement for media service providers to disclose the total annual amount of public funds for state advertising allocated to them.

Since 2018, legislative amendments<sup>80</sup> have required media service providers to reveal the sources of their financing, which must be disclosed “outside the scope of their ordinary activities.” This includes contracts with state and city authorities, EU funding, and bank loans.

<sup>76</sup> Mandatory Deposit of Printed and Other Works and the Announcement of Distributors and Providers of Media Services Act, Art. 7a, b, c, available online (in Bulgarian) at: <https://lex.bg/laws/ldoc/2134956545>. The register is available online at <http://mc.government.bg/page.php?p=699&s=745&sp=0&t=0&z=0>.

<sup>77</sup> See more here on CEM's website: [https://www.cem.bg/services\\_reg\\_docs.php?id=343](https://www.cem.bg/services_reg_docs.php?id=343); [https://www.cem.bg/linear\\_reg\\_docs.php?id=2229&cat=1](https://www.cem.bg/linear_reg_docs.php?id=2229&cat=1); [https://www.cem.bg/linear\\_reg\\_docs.php?id=123&cat=1&lang=bg](https://www.cem.bg/linear_reg_docs.php?id=123&cat=1&lang=bg); [https://www.cem.bg/linear\\_reg\\_docs.php?id=2643&cat=1&lang=bg](https://www.cem.bg/linear_reg_docs.php?id=2643&cat=1&lang=bg); [https://www.cem.bg/linear\\_reg\\_docs.php?id=2609&cat=1&lang=bg](https://www.cem.bg/linear_reg_docs.php?id=2609&cat=1&lang=bg)

<sup>78</sup> Pavla Kostova and Tony Wesolowsky, “Pro-Kremlin Forces On Rise In Bulgaria Ahead Of European Elections”, Radio Free Europe/Radio Liberty, 30 May 2024, <https://www.rferl.org/a/kremlin-far-right-european-parliamentary-elections-bulgaria/32972611.html>.

<sup>79</sup> Svetoslav Todorov, “Bulgaria's Leading Party Fast Tracks Former News Director as Sofia Mayoral Candidate”, 25 September 2023, Balkan Insight, <https://balkaninsight.com/2023/09/25/bulgarias-leading-party-fast-tracks-former-news-director-as-sofia-mayoral-candidate/>.

<sup>80</sup> Mandatory Deposit of Printed and Other Works, Art. 7a.

However, the new amendments introduce a legal framework that is open to a range of interpretations and lacks clear instructions regarding the scope of funding that media outlets are required to declare.<sup>81</sup> Moreover, a considerable number of media outlets have been observed to fail to comply with the legal obligation to disclose information regarding their ownership and funding structures.<sup>82</sup> While the theoretical consequence of such legal provisions might be presented as an enhanced transparency of media ownership, in practice, critics have highlighted that the legislation disproportionately targets media outlets that rely on donations from readers or grant funding, while broader transparency requirements are inadequately enforced. It is not uncommon for authorities to neglect their responsibility to oversee whether media publications are providing the required data.

### ***National media ownership databases***

Despite the Radio and Television Act and Ministry of Culture requiring the disclosure of ownership details and maintaining databases with the relevant information, as well as CEM hosting a register with ownership information of radio and television providers, there is currently no centralised database containing ownership information.

### ***Assessment of media market concentrations***

The legislation<sup>83</sup> designates the CPC as the responsible regulator for competition assessments, without requiring substantial involvement from media-specific regulatory bodies like CEM. The media regulator's role is typically limited to content regulation and licensing, rather than directly engaging in market concentration evaluations.

The assessment process for mergers is still primarily concerned with economic factors, with relatively little direct attention paid to media pluralism and editorial independence. In accordance with the Protection of Competition Act, the CPC is obliged to adhere to specific time frames throughout the evaluation process. However, actual deadlines may vary depending on the specific circumstances of each case and the subject matter under assessment.

### ***Notification of media market concentrations***

In line with the Protection of Competition Act, any company intending to engage in a merger, acquisition, or other form of concentration that meets the prescribed financial thresholds is obliged to notify the anti-trust regulator, the Commission for Protection of Competition (CPC).<sup>84</sup> The aforementioned conditions are as follows: the aggregate turnover of all enterprises involved exceeds BGN 25 million (€12.8 million)<sup>85</sup>; the aggregate turnover of each of at least two of the enterprises involved exceeds BGN 3 million (€1.5 million); and the total turnover of the enterprise which is being acquired exceeds BGN 3 million.

<sup>81</sup> See more (in Bulgarian) at <https://tinyurl.com/56m9vd6e>.

<sup>82</sup> See more (in Bulgarian) at <https://openparliament.net/2021/07/08/mediinoto-finansirane-i-prepyatstviyata-pred-negovata-otchetnost/>.

<sup>83</sup> Protection of Competition Act.

<sup>84</sup> See more at <https://www.cpc.bg/en/commission>.

<sup>85</sup> October 2024 average exchange rate according to the Bulgarian National Bank.

These provisions apply to all sectors, including the media. The CPC is entitled to request comprehensive information from the relevant parties in order to evaluate the potential impact of the concentration on market competition. This encompasses financial data, details regarding ownership structures, and other pertinent information required for the CPC to make an informed decision.

Bulgarian legislation does not include specific provisions governing cross-ownership of media companies. The competition law does not include specific provisions addressing the potential impact of media concentrations on media pluralism or editorial independence. Furthermore, there are concerns regarding the political independence of the CPC and thus the impartiality of their decisions.

### ***Impact of media market concentration on media pluralism***

The current legislation in Bulgaria does not explicitly require the CPC to consider the impact of media market concentration on media pluralism or the formation of public opinion. The assessment typically encompasses an evaluation of the effects on competition, market dominance, and the economic health of the sector. However, it does not specifically address media-specific concerns.

### ***Impact of media market concentration on editorial independence***

The current legislation does not explicitly require the CPC to consider the impact of media market concentration on the editorial independence of the media.

Over the past decade, Bulgaria has seen a number of mergers and acquisitions in the media sector, with transformations across print, broadcast and telecoms platforms. Some media analysts have expressed concern that these ownership shifts have had a significant impact on media pluralism and editorial independence. However, despite the legal guarantees in place to protect against such concentration, they have not been effectively enforced.

Two recent transactions have reshaped the landscape of television ownership, giving rise to concerns about media concentration. Two major players have emerged as dominant forces, acquiring control of media assets across a range of sectors, including broadcast, telecommunications, online, and print media.

In 2020, the Czech investment fund, owned by the late Petr Kellner, PPF purchased bTV, a leading Bulgarian private television channel, as part of the acquisition of Central Media Enterprises (CME), which owns a number of broadcasters across Central Europe.<sup>86</sup> PPF has also previously acquired the Bulgarian telecommunications operator Yettel (former Telenor). The sale was approved by the European Commission.<sup>87</sup> Following the change of ownership of bTV, Venelin Petkov, news director, was dismissed, and Gena Traikova, news

<sup>86</sup> See more on the company's website at <https://www.cme.net/countries>.

<sup>87</sup> European Commission, "Mergers: Commission approves PPF's acquisition of CME, 6 October 2020", available online at [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_1842](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1842).

managing editor, resigned from her post shortly after.<sup>88</sup>

In 2021, United Group, a media and telecoms provider in South-Eastern Europe, acquired Nova Broadcasting Group, which included the leading Nova TV and Netinfo Group, Bulgaria's biggest online media group. The deal was approved by the CPC.<sup>89</sup> Two years earlier, United Group made the strategic acquisition of Vivacom, one of Bulgaria's leading telecommunications companies.<sup>90</sup> Additionally, the company acquired several newspapers previously owned by Delyan Peevski, an influential politician and a prominent figure in the industry.<sup>91</sup> In recent months, the media has reported on plans to sell the Eastern European business of United Group, including its operations and media outlets in Bulgaria.<sup>92</sup>

The absence of specific regulations governing cross-ownership of media companies presents a challenge in limiting the influence of a few powerful individuals over the media landscape. This could have a detrimental impact on media pluralism and editorial independence in Bulgaria.

CPC was responsible for approving the aforementioned media sales. However, there have been concerns expressed about the politicisation of Bulgarian regulators, including CPC, which have led to questions being raised about the rationale behind their decision.

To illustrate, in 2018 the antitrust body rejected PPF's request to acquire Nova Broadcasting Group. However, a year later the same body approved a bid from Kiril Domuschiev, a Bulgarian businessman with alleged close ties to the then-prime minister Boyko Borissov, to purchase the same media company from the Swedish MTG Group. The sale had a significant impact on the media group's editorial independence, resulting in the dismissal of dozens of journalists and reports of attempts to influence the editorial policy.

<sup>88</sup> Vesislava Antonova, "Антон Хекимян заема мястото на Венелин Петков като директор на новините в bTV" (Anton Hekimyan replaces Venelin Petkov as news director at bTV), Capital, 21 December 2020, [https://www.capital.bg/politika\\_i\\_ikonomika/imena/2020/12/21/4155479\\_anton\\_hekimian\\_zaema\\_miaستoto\\_na\\_venelin\\_petkov\\_kato/](https://www.capital.bg/politika_i_ikonomika/imena/2020/12/21/4155479_anton_hekimian_zaema_miaستoto_na_venelin_petkov_kato/); "Гена Трайкова напусна БТВ, сменя я Веселина Петракиева" (Gena Traikova left bTV, replaced by Veselina Petrakieva), Mediapool.bg, 22 January 2021, <https://www.mediapool.bg/gena-traikova-napusna-btv-smenya-ya-veselina-petrakieva-news317154.html>; "'Обезглавено е цяло поколение'. Как БТВ и Нова общуват с властта" ("A whole generation has been beheaded". How bTV and Nova communicate with the authorities), Svobodna Evropa, 13 December 2023, <https://www.svobodnaevropa.bg/a/medii-vlast-vliyanie/32728631.html>.

<sup>89</sup> See more (in Bulgarian) at <https://reg.cpc.bg/Decision.aspx?DeclID=300059170>.

<sup>90</sup> "Британската United Group купува Vivacom за 1,2 млрд. Евро" (The British United Group buys Vivacom for 1.2 billion euros), Clubz.bg, 8 November 2019, <https://clubz.bg/90233-britanskata-united-group-kupuva-vivacom-za-12-mlrd-evro>.

<sup>91</sup> "Собственикът на Nova придобива и вестниците на Делян Пеевски" (The owner of Nova also acquires Delyan Peevski's newspapers), BoulevardBulgaria.bg, 27 January 2021, <https://boulevardbulgaria.bg/articles/sobstvenikat-na-nova-pridobiva-i-vestnitsite-na-delyan-peeovski>.

<sup>92</sup> "UAE's e& seeks to buy \$8.6 bln European carrier United Group, Bloomberg reports", Reuters, 30 April 2024, available online at <https://www.reuters.com/markets/deals/uaes-e-seeks-buy-86-bln-european-carrier-united-group-bloomberg-reports-2024-04-30/>.

The recommendations are structured as follows:

- a) Recommendations aimed at aligning national legislation with the EMFA's general provisions; and
- b) Recommendations aimed at enhancing the media environment regardless of EMFA.

## Independence of media regulators

### *Brief overview of EMFA provisions*

The 2018 amendment of the Audiovisual Media Services Directive (AVMSD) already set out the requirements for independent media regulators. These include functional independence from governments, impartiality and transparency, operation without instructions, clearly defined competences and powers, an effective appeal mechanism, a proper mechanism to appoint and dismiss the head and the body of the authority, and also adequate financial and human resources and enforcement powers. In light of the above, EMFA essentially reiterates the stipulations set forth in Article 30 of the AVMSD, with the notable addition of provisions pertaining to the requisite resources, specifically technical resources, and the authority to request information and data. Consequently, prior to the implementation of EMFA, Member States are obliged to adhere to the majority of the requirements pertaining to independent media regulators as outlined in Article 30 of the AVMSD.

### **Aligning with EMFA's general provisions: what is needed?**

The recommendations were first published in December 2024. Since then, there has been no substantive change in the media environment, nor have the recommendations been implemented. They therefore remain relevant as of September 2025.

Bulgarian legislation is broadly consistent with EMFA's overarching principles regarding the autonomy of its media regulatory body. However, the provision outlined in Article 30(4) of the AVMSD concerning the financing of the regulator has yet to be incorporated into Bulgarian legislation.

It is also recommended that

- transparent and clearly defined criteria be established and enforced for the appointment of CEM members, with the objective of ensuring the independence of its members,
- the selection criteria for CEM members be amended to ensure the appointment of qualified, competent, and independent candidates with a proven track record in relevant fields,
- the necessary funding be provided and the requisite administrative capacity be built in order to ensure that the CEM is able to fulfil its responsibilities.

## Further enhancing the media environment: what is needed?

- The accountability mechanisms for CEM should be strengthened and enhanced

## Independence of public service media

### *Brief overview of EMFA provisions*

Article 5 of EMFA requires that governments guarantee the independent functioning of public media, including ensuring their editorial and functional independence, that procedures for appointing the management guarantee the independence of public media, that those appointed are done so on the basis of transparent, open, effective and non-discriminatory procedures and criteria, that funding is transparent, adequate, sustainable and predictable and can guarantee the editorial independence of the public media, and that an independent body is designated to monitor the application of these principles.

### Aligning with EMFA's general provisions: what is needed?

The recommendations were first published in December 2024. Since then, there has been no substantive change in the media environment, nor have the recommendations been implemented. They therefore remain relevant as of September 2025.

- Heads of public service media should be required to adhere to transparent and impartial criteria in their appointment procedures, with a view to preventing undue political influence.
- The selection criteria for candidates for the governing bodies of public broadcasters should be enhanced and enforced to ensure that only those who are suitably qualified, competent and independent are considered.
- Public media must have adequate, sustainable and predictable financial resources that can safeguard editorial independence. Multi-year budgeting should be adopted to facilitate long-term strategic planning and enhance predictability.<sup>93</sup>

## Further enhancing the media environment: what is needed?

- The appointment of members of the management board should be conducted in a transparent, meritocratic, and publicly accountable manner. Civil society should be permitted to assume a more active role, including the nomination of members of the management bodies or participation in the decision-making process.
- The public mission of public service media should be better defined and reinforced to guarantee plurality of voices and diversity of topics.
- Public broadcasters should conduct audience research and tailor programming according to the needs of the audience.<sup>94</sup>

<sup>93</sup> Funding changes of public service media were introduced in a 2021 legislative bill, which remains under review and has not yet been adopted. Details and the full text of the bill can be found online here:

<https://www.parliament.bg/bg/bills/ID/163525>

<sup>94</sup> Identifying the public mission of public service media was a subject of a 2021 legislative bill, which remains under review and has not yet been adopted. Details and the full text of the bill can be found online here:

<https://www.parliament.bg/bg/bills/ID/163525>

- In addition to advertising, public media should have diverse sources of funding, such as a form of license fee or tax on electronic products, in order to guard against fluctuations in government support that may be used to apply arbitrary political pressure.
- An independent body or an enhanced role for CEM, if it meets the requirements as an independent body, are necessary to ensure the implementation of editorial standards and the political neutrality of public service media.

## **Misuse of state funds to influence media output**

### ***Brief overview of EMFA provisions***

Article 25 of the EMFA states that, while public procurement rules remain unchanged, state advertising must be awarded in accordance with transparent, objective, proportionate and non-discriminatory criteria.

### **Aligning with EMFA's general provisions: what is needed?**

The recommendations were first published in December 2024. Since then, there has been no substantive change in the media environment, nor have the recommendations been implemented. They therefore remain relevant as of September 2025.

- Transparent, objective, and non-discriminatory criteria for the distribution of state funds, including advertising, to media outlets should be established. The allocation of all state advertising and other funding through public tenders, directly or indirectly through advertising agencies, should be based on transparent, objective, and competitive processes. Criteria used for distribution should include transparent measures such as audience reach, contribution to the public interest, and compliance with ethical journalism standards.
- All government agencies and state run companies should provide full transparency on the advertising expenditure.
- All media service providers should be required to disclose the total annual amount of state advertising that they receive.
- An independent body must be designated with responsibility for monitoring the allocation of state advertising expenditures to media service providers. It is recommended that the independent body issue annual reports on the distribution of funds, identifying any instances of preferential treatment or political influence.

### **Further enhancing the media environment: what is needed?**

- All state advertising contracts with media outlets should be fully disclosed. This encompasses the quantity of financial resources allocated, the length of contractual agreements, and the criteria employed to determine the allocation of funding.

## Media pluralism and political/state influence over news media

### *Brief overview of EMFA provisions*

Article 6 of the EMFA requires news media organisations to provide information about their owners, including potential conflicts of interest, and to implement measures to ensure editorial independence. Article 22 of the EMFA requires governments to implement a system for the assessment of concentrations that could have a significant impact on media pluralism and editorial independence.

### **Aligning with EMFA's general provisions: what is needed?**

The recommendations were first published in December 2024. Since then, there has been no substantive change in the media environment, nor have the recommendations been implemented. They therefore remain relevant as of September 2025.

- More rigorous regulations pertaining to the transparency of media ownership should be introduced to guarantee that media service providers publish information regarding their ownership structure and publicly disclose the identities of their beneficial owners.
- A centralised register should be established, wherein media ownership information is updated on a regular basis and made readily accessible to the public.
- Changes of ownership in the media sector should be assessed for both their impact on competition as well as their impact on media pluralism and editorial independence. An appropriate authority should be designated to monitor and measure media pluralism and to advise the competition authority in order to stop ownership changes that damage media pluralism and threaten editorial independence.
- The authority must be equipped with the expertise and the resources to develop and apply an appropriate methodology for assessing media pluralism and editorial independence.

### **Further enhancing the media environment: what is needed?**

- In the event of non-compliance with ownership disclosure requirements, media outlets should be subject to meaningful penalties.

# MEDIA CAPTURE MONITORING REPORT: BULGARIA

NOVEMBER 2025

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This report by IPI is part of the Media Freedom Rapid Response (MFRR), which tracks, monitors and responds to violations of press and media freedom in EU Member States and Candidate Countries.

This project provides legal and practical support, public advocacy and information to protect journalists and media workers.

The MFRR is organised by a consortium led by the European Centre for Press and Media Freedom (ECPMF) including ARTICLE 19 Europe, the European Federation of Journalists (EFJ), Free Press Unlimited (FPU), the International Press Institute (IPI) and Osservatorio Balcani e Caucaso Transeuropa (OBCT).

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