



CENTER FOR
THE STUDY OF
DEMOCRACY

Countering Hybrid Threats in Bulgaria

Enhancing Policy, Regulatory, and Institutional
Resilience in Support of Weapons of
Mass Destruction Nonproliferation

Countering Hybrid Threats in Bulgaria:

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Resilience in Support of Weapons of
Mass Destruction Nonproliferation**



This report outlines the existing policy, regulatory, and institutional arrangements for countering WMD hybrid threats in Bulgaria. It examines the national regulatory and policy instruments, competent authorities, and mechanisms involved in (1) prevention of and response to suspicious CBRN events, (2) cybersecurity, and (3) countering disinformation.

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INTRODUCTION

The development, proliferation, and use of weapons (and materials) mass destruction (WMD) – chemical, biological and nuclear weapons – remain a **threat to European security**. Attacks involving the deployment of chemical, biological, radioactive, and nuclear (CBRN) materials or agents can be hard to detect and attribute which makes the prevention and response to such attacks particularly challenging. WMD hybrid threats can also include cyberattacks against facilities that store, or process such materials, and disinformation campaigns such as unsubstantiated allegations of WMD activities and other efforts that seek to undermine the existing international mechanisms and norms for countering WMD development and use.

Long before its invasion of Ukraine, Russia has perfected a **wide-ranging arsenal of hybrid warfare tools** deployed in Europe: election meddling and strategic corruption aimed at political parties and media, cyber-attacks on critical infrastructure and disinformation, economic coercion, but also **targeted assassinations using difficult-to-detect toxic agents**.¹ Europe's southeastern flank, and Bulgaria in particular, remain vulnerable to the Kremlin's influence operations.

Bulgaria has been the target of various kinds of hybrid threats by the Kremlin. Operatives of the Russian intelligence service have been formally accused of attempted murder involving the poisoning of the owner of Bulgaria's largest producer and trader of ammunition and weapons with Novichok-like agent. There have been numerous explosions and other suspicious incidents in different facilities owned by the country's military industrial complex, and Bulgarian critical infrastructure and public and private institutions have suffered a tsunami of cyberattacks, which have intensified after Russia's invasion of Ukraine in February 2022. In October 2022, the pro-Kremlin hacker group known as Killnet conducted a series of distributed denial of service (DDoS) attacks against government ministries and critical infrastructure; the servers and websites of the Center for the Study of Democracy were also targeted as part of these attacks.²

The Bulgarian State National Security Agency (SANS) observed that in 2021 the **Black Sea region became the main theater of strained competition and confrontation**. In the second half of the year the Russian Federation launched a vast hybrid campaign for preventing the eastward expansion of NATO and preserving Russian influence in the countries of the region. In pursuing these goals, it employed a complex set of instruments, including diplomacy, military and special forces, economic leverage and dependencies (mainly in

¹ Center for the Study of Democracy, *Countering Hybrid Threats in Bulgaria*, Policy Brief No. 118, November 2022. On Russia's use of toxic agents in targeted assassinations see the decision of the ECHR regarding the case of Alexander Litvinenko who was murdered in 2006 using polonium, European Court of Human Rights, *Carter v. Russia*, no. 20914/07, September 21, 2021.

² [We are Killnet](#), October 15, 2022.

the energy field), information propaganda, and disinformation campaigns and cyberattacks.³

In 2022, the Kremlin has intensified its **disinformation campaigns using technically specific and malign narratives** of bioweapon development in Ukraine. Previous similar efforts against Bulgaria have included the spread of ill-founded claims that the US is carrying out biological experiments on Bulgarian soldiers at one of the leading medical facilities in the country.⁴ This is part of the Kremlin's wider and longer-term efforts of sowing fear in Europe by undermining the international regimes and cooperation in the area of non-proliferation of weapons of mass destruction (WMD).

To amplify the influence of its disinformation narratives in the media sector in Southeast Europe, Russia has increasingly relied upon **media capture strategies** including ownership of media outlets, control over advertising budgets, and support and patronage for journalistic proxies who manufacture fake news to advance pro-Kremlin disinformation narratives.⁵

This report outlines the existing policy, regulatory, and institutional arrangements for countering WMD hybrid threats in Bulgaria. It examines the national regulatory and policy instruments, competent authorities, and mechanisms involved in the (1) prevention of and response to suspicious CBRN events, (2) cybersecurity, and (3) countering disinformation.⁶

³ Bulgaria, State Agency for National Security, *Annual Report on the Activities of the State Agency for National Security in 2021*.

⁴ Vasileva, K., „Не, Пентагонът не прави биоексперименти с български войници“ [No, the Pentagon does not do bioexperiments with Bulgarian soldiers], *Factcheck.bg*, March 10, 2022.

⁵ Shentov, O., Stefanov, R., and Vladimirov, M. (eds.), *The Kremlin Playbook in Europe*, Sofia: Center for the Study of Democracy, 2020.

⁶ Part of the background research that has informed the development of these sections of the report was conducted within the framework of the initiatives *MASC-CBRN: Methodology for Assessing States' Capacity for Countering the Misuse of CBRN Materials and Knowledge* and the *ARISA 2: Assessing the Risk of Isolation of Suspects and Accused: The Role of the Media*.

WMD DEFENSE AND COUNTER-TERRORISM

The policy, regulatory, and institutional arrangements for ensuring WMD defense and countering WMD terrorism reflect Bulgaria’s commitments under relevant international law in the area of disarmament, nonproliferation, and counter-terrorism. Table 1 provides an overview of the participation of Bulgaria in relevant international treaties, conventions, and initiatives.

Table 1. Bulgaria’s Participation in WMD Disarmament, Nonproliferation, and Counter-Terrorism Instruments and Initiatives

	International Instrument / Initiative	Country-Specific Information
Nuclear Nonproliferation	Treaty on the Non-Proliferation of Nuclear Weapons (NPT)	Bulgaria fulfils its commitments under the NPT, including regular reporting to the International Atomic Energy Agency (IAEA) and EU in accordance with the applicable Safeguards Agreement . The Chairman of the Nuclear Regulatory Agency (NRA) oversees the implementation of the Treaty provisions at the national level.
	Convention on the Physical Protection of Nuclear Material (CPPNM) and its 2005 Amendment	Bulgaria has implemented the CPPNM and its 2005 Amendment and continues to cooperate with the IAEA on further strengthening the existing safety and security framework . The Bulgarian Nuclear Regulatory Agency is the principal national authority for oversight of the physical protection of nuclear material.
	Comprehensive Test-Ban Treaty (CTBT) – <i>not yet in force</i>	Bulgaria is one of the 44 States that need to ratify the CTBT before it enters into force. Bulgaria has provided support for the work of the Preparatory Commission for the Comprehensive Test-Ban Treaty Organization (CTBTO) in areas such as training, verification regime enhancement and technical assistance to third countries. The National Focal Point for the CTBTO is the Ministry of Defense.
	Zangger Committee (known as the NPT Exporters Committee)	The National Point of Contact for the Zangger Committee in Bulgaria is the Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction . Bulgaria applies nuclear export and import control requirements in accordance with the regime.
	Nuclear Suppliers Group (NSG)	Designated National Authorities for the implementation of this regime include the Ministry of Foreign Affairs and the Ministry of Economy and Industry. The Inter-Ministerial Commission for Export Control and Nonproliferation on WMD is tasked with licensing and authorization procedures.
	Code of Conduct on the Safety and Security of Radioactive Sources and its Supplementary Guidance, 2004	Bulgaria is committed to the implementation of the Code of Conduct and its supplements. The Chairman of the Bulgarian Nuclear Regulatory Agency (BNRA) is the National Regulatory Body for the Control of Radiation Sources. BNRA also serves as the National Point of Contact for facilitating the export and/or import of radioactive sources.

	International Instrument / Initiative	Country-Specific Information
Prohibition of Biological and Chemical Weapons	Biological and Toxin Weapons Convention (BTWC)	Bulgaria participates in the voluntary annual exchange of Confidence Building Measures under the BTWC. The National Centre of Infectious and Parasitic Diseases serves as National Point of Contact .
	Chemical Weapons Convention (CWC)	Bulgaria participates in the work of the Organization for the Prohibition of Chemical Weapons (OPCW). The Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction performs the functions of the National Authority under the CWC.
	The Australia Group (AG)	The AG requirements concerning the export of biological and chemical agents and toxins, and related equipment are codified in national legislation. The Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction fulfils the functions of a relevant national authority.
WMD Nonproliferation	United Nations Security Council Resolution 1540 (UNSCR 1540) on the non-proliferation of weapons of mass destruction	Bulgaria reports to the UNSC 1540 Committee on the implementation of relevant regulatory and policy measures undertaken on the national level.
	United Nations Security Council Resolution 1373 on combatting threats to peace and security posed by terrorist acts	This resolution lays down specific provisions for countering terrorism financing. Bulgaria reports to the UNSC Counter-Terrorism Committee (CTC) on the implementation of relevant regulatory and policy measures undertaken on the national level.
	The Wassenaar Arrangement	Bulgaria is a co-founder of the regime which applies to transfers of conventional arms and dual-use goods and technologies. In line with the regime requirements , Bulgaria provides regular reports on any realized exports to non-member countries. The National Point of Contact for the Wassenaar Arrangement in Bulgaria is the Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction .

Source: CSD.

Defense

The **Operation and Management of the System for Ensuring National Security Act** adopted in 2015 defines the core elements of the system for ensuring national security in Bulgaria which comprises state authorities and structures performing diplomatic, defense-related, intelligence- and counter-intelligence-gathering, operative-searching, law enforcement, and security-related functions (Art. 3 (1)).⁷ These authorities and structures are represented in the **Security Council**, a consultative and coordinating body to the **Council of Ministers**. The Security Council is chaired by the Prime

⁷ Bulgaria, Operation and Management of the System for Ensuring National Security Act [Закон за управление и функциониране на системата за защита на националната сигурност], Prom. SG 61/11 August 2015, last amed. SG 15/22 February 2022.

Minister and serves as a key mechanism in the processes of decision-making and implementation of national security policies (Art. 8, 9). It develops and puts forward concrete steps and measures for risk and crisis management and threat reduction; facilitates multi-agency coordination; and supports crisis communication (Art. 8, 9). The Security Council meets at least once every three months; when necessary, emergency meetings are also convened (Art. 12 (1), (2)). The Security Council has a leading role in crisis management, whereby its secretariat fulfils the functions of a National Situation Centre (Art. 18 (2)). The Act contains provisions for maximizing public engagement through the establishment of a consultative mechanism which makes it possible for civil society to participate in the development of draft legislation and policy initiatives (Art. 24 (2)).

The Bulgarian national security and defense policy as regards the prevention of WMD proliferation and countering the misuse of CBRN materials and information is set out in several mutually reinforcing documents. The **National Defense Strategy** (2016), the **Doctrine of the Bulgarian Armed Forces** (2017), and the **Updated National Security Strategy of Bulgaria** (2018) define the parameters of nuclear, chemical, and biological (NCB) defense. NCB defense is underpinned by three main pillars – **prevention, protection, and recovery** – which encompass activities that are performed prior to the occurrence of a CBRN incident, during an incident, and after an incident has occurred.⁸ The primary goal of NCB defense is to identify opportunities for breaking the CBRN event chain as early as possible. This is achieved through careful planning, preparedness, and implementation of timely and effective counter-measures. NCB defense is an essential element of the process of ensuring the protection of the armed forces at all levels of management and command and, as such, it spans the entire scope of military missions and operations.⁹ NCB defense is also pertinent to Bulgaria's contribution to the multilateral efforts to strengthen international peace and security and prevent the proliferation of WMD, including reducing the risk that non-State actors may acquire and use WMD.¹⁰

The **Defense and the Bulgarian Armed Forces Act** defines the parameters of national defense and the role, duties, and responsibilities of the Bulgarian armed forces.¹¹ Under this Act, the armed forces are tasked with collaborating with other security forces in the fight against the proliferation of weapons of mass destruction, arms trafficking, and terrorism (Art. 57 (1) 1). The Bulgarian armed forces can also be involved in ensuring the security of locations of strategic significance and critical infrastructure (Art. 57 (1) 2). The capabilities of the Bulgarian Army for nuclear, chemical, and biological defense (NCBD)

⁸ Bulgaria, Ministry of Defence, *Doctrine of the Bulgarian Armed Forces* [[Доктрина на въоръжените сили на Република България](#)], November 2017.

⁹ Bulgaria, Ministry of Defence, *Doctrine of the Bulgarian Armed Forces* [[Доктрина на въоръжените сили на Република България](#)], November 2017.

¹⁰ Bulgaria, Council of Ministers, *National Defence Strategy* [[Национална отбранителна стратегия](#)], 2016; Bulgaria, National Assembly, *Updated National Security Strategy of Bulgaria* [[Актуализирана стратегия за национална сигурност на Република България](#)], March 14, 2018, Prom. SG 26/23 March 2018.

¹¹ Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, 23 September 2020; Bulgaria, *Defence and the Bulgarian Armed Forces Act*, [[Закон за отбраната и въоръжените сили на Република България](#)], Prom. SG 35/12 May 2009; last amended. SG 62/5 August 2022.

are organized at **three** operational levels: **basic**, **advanced**, and **specialized**. The purpose of these capabilities is to ensure effective NCB preparedness in case of a CBRN incident, regardless of whether it has occurred naturally or as a result of an accident, or deliberate actions. The Bulgarian Army operates an **automated information system** for NCB surveillance and early warning, which is overseen by the Joint Forces Command. At the national level, the system is connected with the National Operation-Communication-Information Centre of the General Directorate “Fire Safety and Civil Protection” (Ministry of Interior) and at the international level, it facilitates data sharing with the counterpart systems of NATO Member States.¹²

The **Ministry of Defense** participates in NATO **initiatives** and working groups that seek to strengthen the national capabilities and collective security in the area of **CBRN defense**.¹³ The **Framework Nations Concept** is a NATO-led initiative focusing on strengthening European capabilities through sustained defence cooperation.¹⁴ Bulgaria participates in the CBRN Protection Cluster that is led by Germany.¹⁵ The **Smart Defense Initiative** has been launched by NATO as a cooperative way of generating modern defense capabilities that the Alliance needs in a more cost-efficient, effective and coherent manner.¹⁶ Within the framework of this initiative, Bulgaria participates in a project titled ‘**Pooling CBRN Capabilities**’ that is coordinated by Poland. Bulgaria is also represented in the NATO Joint Working Group on CBRN Capacity Building.

Under **Decree No 50** adopted by the Council of Ministers on 1 March 2012, the **State Agency for National Security (SANS)** performs the functions of a **National Coordination Centre for Counter-Proliferation**. The main goal of the Centre is to facilitate inter-agency and multi-stakeholder cooperation in the area of national security and countering WMD threats.¹⁷ SANS plays an important role in preventing the proliferation of weapons of mass destruction by monitoring the visits to Bulgaria of individuals coming from countries considered ‘risky’.¹⁸ The Agency also carries out outreach activities with representatives of Bulgarian scientific units, in order to raise awareness of the risks of unauthorized technology transfer.

The **Export Control on Defense-Related Products and Dual-Use Items and Technologies Act** adopted in 2011 is an important element of the state’s legal architecture for preventing the proliferation of weapons of mass destruction.¹⁹

¹² Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, 23 September 2020.

¹³ Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, 23 September 2020.

¹⁴ See Major, C., and Mölling, C., ‘[The Framework Nations Concept: Germany’s Contribution to a Capable European Defence](#)’, *SWP Comment*, December 2014/C 52.

¹⁵ Schiff, K., ‘[Framework Nations Concept Cluster „CBRN Protection”](#)’, *Crisis Prevention*, 27 January 2020.

¹⁶ North Atlantic Treaty Organisation, [Smart Defence](#), February 20, 2017.

¹⁷ Bulgaria, State Agency for National Security, Letter No. 1334 to the Center for the Study of Democracy, October 1, 2020.

¹⁸ Bulgaria, State Agency for National Security, [Annual Report on the Activities of the State Agency for National Security](#), 2019.

¹⁹ Bulgaria, Export Control on Defence-Related Products and Dual-Use Items and Technologies Act [[Закон за експортния контрол на продукти, свързани с отбраната, и на изделия и технологии с двойна употреба](#)], Prom. SG 26/19 March 2011; last amed. SG 63/9 August 2019.

This Act sets out the procedures and requirements for the export, import, transfer, transit, and brokerage of defense-related products and dual-use items and technologies, and authorization thereof (Art. 1 (1)). The **Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction** considers applications for the export, import, transfer, transit, and brokerage of defense-related products and dual-use items and technologies.²⁰

The **National Customs Agency** performs **control functions** for preventing the **illicit trafficking** of strategic goods, including dual-use items and technologies that may be used for WMD development.²¹ The customs services can bar exports or in specific cases, to delay the export of defense-related products for 30 days. In case of violation, customs services can impose administrative sanctions.²² Additional national regulatory instruments in the area of WMD-related export and import control include:

- **Decree No 204 of the Council of Ministers of 19 September 2018** on the Adoption of a List of Defense-Related Products and a List on Dual-Use Items and Technologies That Shall Be Subject to Import Control.
- **Decree No 272 of the Council of Ministers of 30 October 2012 and Decree No 178 of the Council of Ministers of 12 July 2019 amending Decree No 91 of the Council of Ministers of 9 April 2001** on Confirming the List of States and Organizations to which Bulgaria Prohibits or Limits the Trade in and Supply in Armament and Related Equipment, in accordance with relevant Resolutions of the UN Security Council, EU Council Decisions, and Decisions of the Organization for Security and Cooperation in Europe.²³

Specialized training in the area of NCB defense and protection is provided by the “**Vasil Levski**” **National Military University** (degree course titled ‘Troops for Nuclear, Chemical, and Biological Defense and Ecology’) and the “**G.S Rakovski**” **National Defense College** (post-graduate degree course titled ‘Troops for Nuclear, Chemical, and Biological Defense and Ecology’).²⁴ The **Military-Medical Academy** offers continued professional development courses in relevant disciplines, including:

²⁰ Bulgaria, Ministry of Economy and Industry, [Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction](#); Bulgaria, Ministry of Economy, Letter No. 74-00-39 to the Center for the Study of Democracy, October 7, 2020.

²¹ Bulgaria, Ministry of Finance, National Customs Agency, Letter No. 32-274740 to the Center for the Study of Democracy, September 21, 2020; Export Control on Defence-Related Products and Dual-Use Items and Technologies Act [[Закон за експортния контрол на продукти, свързани с отбраната, и на изделия и технологии с двойна употреба](#)], Prom. SG 26/19 March 2011; last amended. SG 63/9 August 2019.

²² Bulgaria, Ministry of Finance, National Customs Agency, Letter No. 32-274740 to the Center for the Study of Democracy, September 21, 2020; Bulgaria, Export Control on Defence-Related Products and Dual-Use Items and Technologies Act [[Закон за експортния контрол на продукти, свързани с отбраната, и на изделия и технологии с двойна употреба](#)], Prom. SG 26/19 March 2011; last amended. SG 63/9 August 2019.

²³ Bulgaria, Ministry of Economy, Letter No. 74-00-39 to the Center for the Study of Democracy, October 7, 2020.

²⁴ Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, September 23, 2020.

- Medical care in non-military crisis situations.
- Healthcare management in living areas surrounding nuclear power plants.
- Healthcare provision in case of toxic poisoning.
- Healthcare provision in case of industrial accidents.
- Healthcare management in case of peacetime or military emergency.²⁵

Civil Protection

The **Disaster Protection Act** is a key regulatory instrument in the area of **civil protection**. The Act focuses on preventing and reducing the risk of natural and man-made disasters and strengthening national capacity for disaster preparedness and response through the establishment of an integrated rescue system.²⁶ Under this Act, **disaster risk prevention** and management planning is carried out at the **national, regional, and local** level (Art. 6a). The main policy instrument in the area of disaster protection is the **National Strategy for Reducing Disaster Risks** (Art. 6b). CBRN risks, including those resulting from deliberate acts and the use of WMD are covered within the national policy framework for disaster prevention and civil protection (Art.19). Bulgarian armed forces, security forces, particularly the **General Directorate “Fire Safety and Civil Protection”** of the Ministry of Interior (Box 1) and healthcare services are involved in the integrated rescue system (Art.20).

Box 1. General Directorate “Fire Safety and Civil Protection”²⁷

The General Directorate “Fire Safety and Civil Protection” is a specialized structure within the Ministry of Interior, Bulgaria. It comprises two administrative departments: Oversight and Prevention Department and Operations Department, as well as 28 regional departments.

Instruction No 8121-h-953 of 8 December 2014 sets out the terms and procedure for **chemical, biological, and radiological protection** in case of fire, disasters, or other emergency situations.²⁸ The Instruction focuses on CBRN incidents that result from natural disasters or accidents, including industrial and transport accidents. Chemical, biological, and radiological protection includes incident prevention, reducing the negative impact of incidents, provision of rescue and evacuation services, and incident recovery. Rele-

²⁵ Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, September 23, 2020. See also [Military Medical Academy](#).

²⁶ Bulgaria, Disaster Protection Act [Закон за защита при бедствия], Prom. SG 102/19 December 2006; last amended. SG 60/7 July 2020.

²⁷ Bulgaria, Ministry of Interior, General Directorate “Fire Safety and Civil Protection”, Letter No. 198300-8063 to the Center for the Study of Democracy, September 29, 2020.

²⁸ Bulgaria, Ministry of Interior, General Directorate “Fire Safety and Civil Protection”, Instruction No 8121-h-953 on the Terms and Procedure for Chemical, Biological, and Radiological Protection in Case of Fire, Disasters, and Emergency [Инструкция № 8121-h-953 от 8 декември 2014 г. за условията и реда за осъществяване на химическа, биологическа и радиационна защита при пожари, бедствия и извънредни ситуации], December 8, 2014.

vant activities entail localization of the incident; detection, surveillance, and early warning among the population in the zone of the incident; organizing chemical, biological, and radiological protection activities; use of the integrated rescue system; maintenance of the required technical equipment for incident preparedness and response, including personal protective equipment; implementation of sanitary, epidemiological, and safety measures; and provision of training for the units of the integrated rescue system.

Under the **National Plan for Disaster Protection**, the Bulgarian armed forces are tasked with performing disaster preparedness and response functions in case of a nuclear event.²⁹ These include:

- Evacuation of the population in the incident zone and in proximity to the incident zone.
- Radiation surveillance and data collection.
- Decontamination of individuals, infrastructure, and the environment.
- Rescue services and admission of individuals exposed to ionizing radiation for treatment at the Military-Medical Academy.

Under the **Disaster Protection Plan of the Ministry of Defense**, the Bulgarian Army maintains and when required, deploys specialized units for disaster response and recovery.³⁰ These include **NCB defense-designated units** that are equipped with appropriate technology and devices and constitute an important element of the system for CBRN incident preparedness.

The **Council for Disaster Risk Reduction** under the auspices of the Council of Ministers is a consultative organ that develops the core policy and strategic documents in the field of disaster risk reduction, including the National Strategy for Disaster Risk Reduction, the National Program for Disaster Risk Reduction, and the National Plan for Disaster Protection and coordinates their implementation.³¹ The Council is chaired by the **Minister of Interior** and the Director of the General Directorate “Fire Safety and Civil Protection” heads the Council’s secretariat.

The **Strategy for Disaster Risk Reduction 2014-2020** takes an all-hazard approach to CBRN risks addressing incidents that may arise from natural disasters (e.g. naturally occurring diseases), industrial accidents (e.g. technical failures at nuclear power plants, chemical plants etc.), or hostile misuse (e.g. terrorist acts).³² In order to prevent the multifaceted negative effects of natural or man-made hazards, the Strategy defines **four priority areas of action**:

²⁹ Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, September 23, 2020.

³⁰ Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, September 23, 2020.

³¹ Bulgaria, Council of Ministers, Council for Disaster Risk Reduction [[Съвет за намаляване на риска от бедствия](#)].

³² Bulgaria, Council of Ministers, Strategy for Disaster Risks Reduction, 2014-2020 [[Стратегия за намаляване на риска от бедствия 2014 – 2020 г.](#)] 2014.

- Development of a sustainable national policy and robust regulatory and institutional framework for disaster risk prevention.
- Risk identification, assessment, and monitoring, including strengthening of the existing national systems for forecasting, surveillance, early warning and disaster reporting.
- Fostering a culture of disaster protection at all levels of governance by leveraging scientific expertise, research, and innovation.
- Reducing the main risk factors and enhancing the preparedness for effective disaster response at all levels of governance.³³
- The **National Program for Disaster Risk Reduction 2021-2025** which seeks to facilitate the implementation of the **National Strategy for Disaster Risk Reduction 2018-2030** focuses on the following priority areas:
 - Reducing disaster vulnerability across the population.
 - Improving coordination and efficiency in implementing activities for disaster risk reduction in different sectors and avoiding duplication of effort.
 - Increasing investment in disaster risk reduction.
 - Improving data sharing on disaster risk analysis.
 - Leveraging public-private partnerships for achieving better results in disaster risk reduction.
 - Promoting innovation for disaster risk reduction.³⁴

The **NATO Crisis Management and Disaster Response Centre of Excellence (CMDR COE)** situated in Bulgaria offers continued professional development courses for enhancing operational capacity for emergency preparedness and response.³⁵ These include:

- Crisis management and disaster response.
- Training for personnel involved in planning and conducting training in crisis management and disaster response.
- Leadership in crisis response operations.

³³ Bulgaria, Council of Ministers, Strategy for Disaster Risks Reduction, 2014-2020 [[Стратегия за намаляване на риска от бедствия 2014 – 2020 г.](#)] 2014.

³⁴ Bulgaria, Council of Ministers, National Programme for Disaster Risk Reduction, 2021-2025 [[Национална програма за намаляване на риска от бедствия 2021 – 2025 г.](#)], 2020; Bulgaria, Council of Ministers, National Strategy for Disaster Risk Reduction, 2018-2030 [[Национална стратегия за намаляване на риска от бедствия 2018 – 2030 г.](#)], 2018.

³⁵ Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, September 23, 2020; See also [NATO Crisis Management and Disaster Response Centre of Excellence \(CMDR COE\)](#).

- Expert-level course in crisis response operations.
- Disaster management.

Counter-Terrorism

Under the **Criminal Code**, the development, manufacturing, production, repair, storage, acquisition, trade, transfer, transport, import, export, and use of **chemical, biological, and nuclear weapons** for the **purposes of terrorism** (i.e. to incite fear among the population, or to threaten or compel a national state authority, a popular figure, or a representative of a foreign government or an international organization to do or not do something) is punishable by imprisonment of five to fifteen years if no death has been caused; such acts are punishable by imprisonment of fifteen to thirty years with the option of life imprisonment with or without parole if death has been caused (Art. 108a).

The Code further establishes that the production, development, processing, repair, storage, trade, transport, import, or export of chemical, biological, and nuclear weapons in contravention to the established law shall be punishable by imprisonment of one to six years (Art. 337 (1)).³⁶ If the crime is considered particularly serious, it is punishable by imprisonment of five to fifteen years (Art. 337 (3)). The acquisition of chemical, biological or nuclear weapons is punishable by imprisonment of two to eight years and by imprisonment of three to ten years if the weapons are in large quantities (Art. 339). The use of chemical, biological, and nuclear weapons or radioactive materials to cause bodily injury or death is punishable by imprisonment of ten to twenty years and imprisonment of fifteen to twenty years with the option of life imprisonment, respectively (Art. 336a (3), (4)).

The **Counter-Terrorism Act** adopted in 2016 sets out the national legal framework for countering terrorism in Bulgaria.³⁷ The Act outlines a whole-of-government approach to terrorism prevention and response which seeks to strike a balance between guaranteeing national security and ensuring civil liberties (Art. 1). The **Council of Ministers** is the principal coordinating body of the implementation of counter-terrorism activities and adopts the **National Plan on Counter-Terrorism** (Art. 6). In its activities, the Council of Ministers is assisted by the **Security Council** (Art. 7 (1)). The **National Counter-Terrorism Centre** is situated within the State Agency for National Security (**SANS**). This Centre is tasked with data sharing, and risk analysis and assessment for preventing acts of terrorism and ensuring that appropriate prevention and counter-measures are taken in a timely and effective manner (Art. 8). The **State Intelligence Agency** (SIA) hosts an **inter-agency counter-terrorism unit** which seeks to facilitate data sharing and cooperation among the intelligence services, security and armed forces, customs, and the Prosecutor's Office (Art. 8a).

³⁶ Bulgaria, Criminal Code [[Наказателен кодекс](#)], Prom. SG 26/2 April 1968; last amended. SG 79/4 October 2022; Bulgaria, [1540 Committee Matrix of Bulgaria](#), June 18, 2019.

³⁷ Bulgaria, Counter-Terrorism Act [[Закон за противодействие на тероризма](#)], Prom. SG 103/27 December 2016; last amended. SG 32/26 April 2022.

Under this Act, the **Bulgarian armed forces** are tasked with counter-terrorism and post-incident recovery operations (Art. 9 (1)). They have the right to perform identity checks of persons and searches of personal possessions, buildings, and locations if there are sufficient grounds indicating these persons, buildings, or locations are of relevance in countering or investigating a terrorist incident (Art. 9-13). The Bulgarian armed forces are authorized to use force if they are not able to perform their tasks under this Act in other ways (Art. 14 and 15). The **Prime Minister** can, by dint of order, establish a **National Counter-Terrorism Task Force** for counter-terrorism management (Art. 17). The Task Force is headed by the **Minister of Interior** and in case of a specific terrorist threat or after a terrorist incident activates the implementation of the National Counter-Terrorism Plan (Art. 17 (2), (5)). In the event of a terrorist act involving chemical, biological, radioactive, or nuclear substances or materials, the security services and armed forces involved in the response operation need to establish an operational center for chemical, nuclear, and bacteriological defense (Art. 39 (2)). If the situation requires, a state of emergency can be declared (Art. 40 (1)).

The **National Counter-Terrorism Action Plan** was adopted by the Council of Ministers in 2017. This Action Plan set out three principal objectives:

- Ensuring permanent and effective protection of the people, territory, and national interests of Bulgaria against terrorist threats.
- Promoting a common understanding of the risks and operative coordination among competent authorities when there is a heightened terrorist threat or a terrorist act has occurred.
- Ensuring terrorism prevention by establishing and addressing the causes and enabling factors of terrorist acts.³⁸

The Action Plan reviews a wide range of possible scenarios for terrorist acts including the risk of use of weapons of mass destruction; the risk of use of an explosive device for causing industrial accident or emergency; and the risk of dispersing CBRN materials through the postal services. Terrorist threats are measured on a three-level scale (low, high, and very high) with four corresponding levels of state preparedness. The Plan assigns tasks, duties, and responsibilities to competent authorities at national, regional, and local level of government at each level of state preparedness (permanent preparedness; warning; enhanced preparedness; and response). The implementation of the National Plan is complemented by the implementation of **regional** and **municipal** counter-terrorism plans which relevant authorities prepare and keep up-to-date.

The **Ministry of Interior Act** adopted in 2014 sets out the principles, functions, activities, management, and structure of the Ministry of Interior (Art. 1).³⁹ The **General Directorate “Combatting Organized Crime”** is tasked with

³⁸ Bulgaria, Council of Ministers, National Counter-Terrorism Action Plan [[Национален план за противодействие на тероризма](#)], 2017.

³⁹ Bulgaria, Ministry of Interior Act [[Закон за Министерството на вътрешните работи](#)], Prom. SG 53/27 June 2014; amended. SG 62/5 August 2022.

preventing, countering, responding to, and investigating organized crime involving chemical, biological, and other hazardous materials, including explosives, weapons, and dual-use items and technologies (Art. 39 (2)). This General Directorate also performs functions for preventing, countering, responding to, and investigating terrorism and the threat thereof (Art. 39 (2)). The principal entity in the area of counter-terrorism within the framework of the Ministry of Interior is the **General Directorate “Gendarmerie, Special Operations, and Counter-Terrorism”** (Art. 39 (5)). **General Directorate “Border Police”** performs border security and control functions carrying out checks and searches of persons, personal belongings, luggage, and vehicles for detecting traces of explosives, weapons, munitions, and nuclear or other radioactive materials at border check points (Art. 102 (2)).⁴⁰ Stationary, mobile, and portable detecting equipment is being used for preventing the illicit trafficking, smuggling, or transfer nuclear and other radioactive materials.⁴¹

Decree No 89 of the Council of Ministers of 16 April 2015 established an **Inter-Agency Coordination Centre for Countering Smuggling and Exercising Control on the Movement of Hazardous Goods and Loads**.⁴² The Centre is situated within the **General Directorate “Combatting Organized Crime”** of the Ministry of Interior bringing together representatives of the following agencies:

- General Directorate “National Police”, Ministry of Interior.
- General Directorate “Border Police”, Ministry of Interior.
- State Agency for National Security.
- National Customs Agency, Ministry of Finance.
- National Revenue Agency, Ministry of Finance.
- Executive Agency “Automobile Administration”, Ministry of Transport, Information Technologies, and Communication.⁴³

The Centre carries out 24/7 data collection and analysis and monitors the movement of hazardous goods and loads within Bulgaria.⁴⁴

The **Ministry of Defense** has an internal Counter-Terrorism Action Plan which covers the roles and responsibilities of the entities that are under the

⁴⁰ Bulgaria, Ministry of Interior, General Directorate Border Police, Letter No. 328200-17833 to the Center for the Study of Democracy, September 28, 2020.

⁴¹ Bulgaria, Ministry of Interior, General Directorate Border Police, Letter No. 328200-17833 to the Center for the Study of Democracy, September 28, 2020.

⁴² Bulgaria, Ministry of Finance, National Customs Agency, Letter No. 32-274740 to the Center for the Study of Democracy, September 21, 2020.

⁴³ Ministry of Interior, General Directorate “Combatting Organised Crime”, Coordination Centre for Countering Smuggling and Exercising Control on the Movement of Hazardous Goods and Loads [[Междуведомствен координационен център](#)].

⁴⁴ Ministry of Interior, General Directorate “Combatting Organised Crime”, Coordination Centre for Countering Smuggling and Exercising Control on the Movement of Hazardous Goods and Loads [[Междуведомствен координационен център](#)].

command of the Minister of Defense.⁴⁵ The **State Agency for State Security** has in place two sets of procedural rules that address the risk of unauthorized use and diversion of **nuclear and radioactive materials**.⁴⁶ One of the sets focuses on the response to detected **illicit trafficking of nuclear materials or radioactive sources** at international airports, ports and border checkpoints. The other set focuses on the response to **physical security breaches** related to the theft, illicit transfer/ transport, and misuse of nuclear material or radioactive sources. Both sets of rules are based on a multi-agency approach and seek to ensure effective coordination and cooperation.

In coordination with the **National Customs Agency**, SANS monitors customs operations that involve hazardous substances which could be used for terrorist purposes and/or the production of weapons of mass destruction.⁴⁷ SANS is also actively involved in cooperation activities for minimizing the critical factors that enable deliveries to suspicious end users.

Cybersecurity

The **Cybersecurity Act** adopted in 2018 sets out the national legal framework for the organization, management, and oversight of cybersecurity in Bulgaria, as well as the requirements for ensuring effective **cyber-defense** and **combatting cybercrime** (Art. 1).⁴⁸ The system for cybersecurity is an element of the national security system (Art. 7). The **Cybersecurity Council** is a consultative and coordinating organ that is chaired by a Deputy Prime-Minister (Art. 9 (1), (2)). The Council conducts ongoing risk monitoring and assessment and develops a **National Cybersecurity Strategy** and supplementary **Implementation Roadmap** (Art. 10).

The **National Cybersecurity Strategy “Cyber-Resilient Bulgaria 2020”** was adopted by the Council of Ministers in 2016 and subsequently extended until 2023.⁴⁹ The Strategy seeks to enhance the overall national capacity for combatting all forms of cybercrime and misuse of cyberspace. Particular attention is given to the need for ensuring the protection of critical infrastructure and entities of strategic significance against cyberattacks, including through the implementation of measures that facilitate cooperation between competent authorities and the operators of critical infrastructure and modernization of the existing technical systems. The Strategy further advances a series of concrete actions for the prevention and early detection of hybrid threats in cyberspace and the countering of cyberterrorism, including

⁴⁵ Bulgaria, Ministry of Defence, Letter No.14-13-7 to the Center for the Study of Democracy, September 23, 2020. See also [Military Medical Academy](#).

⁴⁶ Bulgaria, State Agency for National Security, Letter No. 1334 to the Center for the Study of Democracy, October 1, 2020.

⁴⁷ Bulgaria, State Agency for National Security, *Annual Report on the Activities of the State Agency for National Security*, 2019.

⁴⁸ Bulgaria, Cybersecurity Act [[Закон за киберсигурност](#)], Prom. SG 94/13 November 2018; last amended. SG 25/29 March 2022.

⁴⁹ Bulgaria, Council of Ministers, National Cyber Security Strategy – Cyber-Resilient Bulgaria 2020 [[Национална стратегия за кибер сигурност – Киберустойчива България 2020](#)], July 13, 2016. Bulgaria, Council of Ministers, Updated National Cyber Security Strategy – Cyber-Resilient Bulgaria 2023 [[Актуализирана Национална стратегия за киберсигурност „Киберустойчива България 2023”](#)], 2 April 2021.

the development and use of combined technological solution for intercepting and attributing attacks. All of these areas are relevant to combatting the proliferation of WMD and countering the risk of misuse of CBRN materials and related information.

The **Concept for the Development of Artificial Intelligence in Bulgaria 2030** complements the national strategic framework for cybersecurity by laying the groundwork for managing the risk of misuse of AI-enabled systems, applications, and devices as these are being implemented in different areas of public service including transport, healthcare, urban development, law enforcement, justice, and defense, among others.⁵⁰ The Concept also envisages a set of measures for enhancing societal engagement to foster a responsible and ethical ecosystem for AI development and promote awareness of emerging threats, including the potential for large-scale deployment of AI for the purposes of social manipulation and disinformation.

Nuclear Safety and Security

The **Safe Use of Nuclear Energy Act** adopted in 2002 seeks to ensure that nuclear energy, ionizing radiation, and radioactive materials are used only peaceful purposes in line with the provisions of the **Treaty on the Non-Proliferation of Nuclear Weapons**.⁵¹ The Act prohibits the development, manufacturing, transfer, trade (including international trade), storage, transport (including transit), acquisition, possession, and detonation of nuclear weapons or other nuclear explosive devices, as well as the dissemination of information regarding such installations and activities, where this is directed against national security, public order, or public health (Art. 17 (1)). This Act sets out the parameters for the national regulation of the safe use of nuclear energy and ionizing radiation, the safe management of radioactive waste and spent fuel, as well as the rights and obligations of persons who carry out such activities to ensure nuclear safety and security, radiological protection, and physical protection.

The Act establishes a comprehensive national regime for **nuclear safety and security** in the territory of Bulgaria in accordance with the requirements contained in the **Convention on the Physical Protection of Nuclear Material** and its 2005 Amendment.⁵² The Act underscores the need for prioritizing the security of nuclear material, nuclear facilities, and radioactive materials alongside with nuclear safety and radiological protection. The Chairman of the Bulgarian **Nuclear Regulatory Agency (NRA)** exercises **oversight** of nuclear safety, nuclear security, and radiological protection in the use of nuclear energy and ionizing radiation and the management of nuclear waste and spent nuclear fuel (Art. 98 (1)). Chapter VII of the Act deals exclusively with nuclear security and the principles for the physical protection of nuclear

⁵⁰ Bulgaria, Ministry of Transport, Information Technologies, and Communication, Concept for the Development of Artificial Intelligence in Bulgaria 2030 [*Концепция за развитието на изкуствения интелект в България до 2030 г.*], October 2020.

⁵¹ Bulgaria, Safe Use of Nuclear Energy Act [*Закон за безопасно използване на ядрената енергия*], Prom. SG 63/28 June 2002; last amed. SG 102/23 December 2022; Bulgaria, [1540 Committee Matrix of Bulgaria](#), June 18, 2019.

⁵² Bulgaria, Nuclear Regulatory Agency, Letter No. 91-00-104 to the Center for the Study of Democracy, October 13, 2020.

material, nuclear facilities, and radioactive materials. The system for nuclear security of nuclear facilities and the transport of nuclear material is informed by a **security risk assessment** which is carried out by the license-holder responsible for the operation and use of the respective facility and/or material in consultation with SANS (Art. 112). The **responsibility** for ensuring the nuclear security of nuclear facilities and nuclear materials is vested in the license-holder. The **Nuclear Regulatory Agency** grants, amends, renews, cancels, and revokes **licenses** and **permits** for the safe use of nuclear energy and oversees license-holders' compliance with the established requirements for nuclear safety, nuclear security, and radiological protection (Art. 5 (1)). Chapter XI of the Act defines the types of fines and penalties that apply in case of violation of the established rules for nuclear safety and security and radiological protection, including the failure of license-holders to effectively fulfil their corresponding obligations.⁵³

The **Ordinance on the Procedure for Issuing Licenses and Permits for the Safe Use of Nuclear Energy** of 2004 defines the requirements for granting, amending, renewing, cancelling, and revoking licenses and permits, including the nuclear security criteria that need to be met, and the procedures for oversight and monitoring of compliance.⁵⁴ The **Ordinance for the Provision of Physical Protection of Nuclear Facilities, Nuclear Material, and Radioactive Sources** of 2015 defines the procedures for ensuring the nuclear security of nuclear facilities and the storage, use, and transport of nuclear material and radioactive materials; the procedures for conducting risk assessment at nuclear facilities and when planning the transport of nuclear material; and the procedures for creating restricted-access areas at nuclear facilities and nuclear storage locations in accordance with Art. 115 of the Safe Use of Nuclear Energy Act.⁵⁵ The requirements set in this Ordinance are in line with the following International Atomic Energy Agency's guidance documents: *Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities* and *Nuclear Security Recommendations on Radioactive Material and Associated Facilities*.⁵⁶

The **Ordinance on Terms and Procedure for Obtaining Vocational Qualification and on the Procedure for Issuing Licenses for Specialized Training and Individual Licenses for Work Activities involving Nuclear Power** of 2004 specifies the types of jobs and activities that require professional certification, the procedures for conducting certification exams, and the oversight

⁵³ Bulgaria, [1540 Committee Matrix of Bulgaria](#), June 18, 2019.

⁵⁴ Bulgaria, Nuclear Regulatory Agency, Letter No. 91-00-104 to the Center for the Study of Democracy, October 13, 2020; Bulgaria, Council of Ministers, Ordinance on the Procedure for Issuing Licenses and Permits for the Safe Use of Nuclear Energy [[Наредба за реда за издаване на лицензи и разрешения за безопасно използване на ядрената енергия](#)], Prom. SG 41/18 May 2004; last amended. SG 53/5 July 2019.

⁵⁵ Bulgaria, Nuclear Regulatory Agency, Letter No. 91-00-104 to the Center for the Study of Democracy, October 13, 2020; Bulgaria, Council of Ministers, Ordinance for the Provision of Physical Protection of Nuclear Facilities, Nuclear Material, and Radioactive Sources [[Наредба за осигуряване на физическата защита на ядрените съоръжения, ядрения материал и радиоактивните вещества](#)], Prom. SG 82/23 October 2015; last amended. SG 36/13 May 2022.

⁵⁶ International Atomic Energy Agency, [Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities](#), INFCIRC/225/Revision 5, 2011; International Atomic Energy Agency, [Nuclear Security Recommendations on Radioactive Material and Associated Facilities](#), 2011.

mechanisms for monitoring compliance with the certification criteria in the course of professional practice.⁵⁷

Since 2016, the **University of National and World Economy (UNWE)** in Sofia has been delivering an **International Master's Degree Program in Nuclear Security**.⁵⁸ The Program seeks to contribute to nuclear security capacity building by preparing qualified managerial staff for the nuclear security sector. It is a result of the cooperation between the UNWE, the IAEA and the International Nuclear Security Education Network (INSEN) that operates under the auspices of the Agency, the Bulgarian NRA, the Ministry of Energy, and the Ministry of Foreign Affairs. In terms of curriculum, the Program is based on the IAEA's Technical Guidance Document titled *Educational Program in Nuclear Security* covering a range of relevant topics including but not limited to:

- International and National Legal Framework Regulating Nuclear Security;
- Nuclear Energy, Nuclear Fuel Cycle and Nuclear Applications;
- Threat Assessment;
- Physical Protection Technologies, Systems and Equipment;
- Security of Nuclear and Other Radioactive Material in Transport;
- IT/Cyber Security and Computer Security for a Nuclear World;
- Nuclear Security at Major Public Events.⁵⁹

Chemical Safety and Security

The **Prohibition of Chemical Weapons and Control over Toxic Chemicals and Their Precursors Act** adopted in 2000 aims to ensure that toxic chemicals and their precursors are used only for peaceful purposes in line with the provisions of the **Chemical Weapons Convention (CWC)**.⁶⁰ The Act prohibits the development, manufacturing, acquisition, stockpiling, possession, storage, transfer, and use of chemical weapons (Art. 4 (1), (2)). The Act further prohibits engaging in military preparations to use chemical weapons and the use of riot control

⁵⁷ Bulgaria, Council of Ministers, Ordinance on Terms and Procedure for Obtaining Vocational Qualification and on the Procedure for Issuing Licenses for Specialised Training and Individual Licenses for Work Activities involving Nuclear Power [Наредба за условията и реда за придобиване на професионална квалификация и за реда за издаване на лицензии за специализирано обучение и на удостоверения за правоспособност за използване на ядрената енергия], Prom. SG 74/24 August 2004; amended. SG 53/5 July 2019; Bulgaria, Bulgarian Nuclear Regulatory Agency, *Annual Report 2019*, July 21, 2020.

⁵⁸ University of National and World Economy, *International Master's Programme in Nuclear Security*.

⁵⁹ University of National and World Economy, *International Master's Programme in Nuclear Security*; International Atomic Energy Agency, *Educational Programme in Nuclear Security: Technical Guidance*, IAEA Nuclear Security Series No 12, 2010.

⁶⁰ Bulgaria, Prohibition of Chemical Weapons and Control over Toxic Chemicals and Their Precursors Act [Закон за забрана на химическото оръжие и за контрол на токсичните химически вещества и техните прекурсори], Prom. SG 8/28 January 2000; last amended. SG 63/9 August 2019; Bulgaria, *1540 Committee Matrix of Bulgaria*, June 18, 2019.

agents as a method of warfare (Art. 4 (3), (4)). It seeks to ensure that the conduct of activities involving toxic chemicals and their precursors is subject to state oversight, in order to guarantee national security (Art. 2). The Act mirrors the provisions of the CWC and contains its three Schedules of toxic chemicals as annexes. The **Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction** serves as a **National Authority** under the CWC and oversees the national implementation of its provisions.⁶¹

Under this Act, a person who manufactures, acquires, stockpiles, or uses a chemical substance listed in Annex 1 of the Act (i.e. CWC Schedule 1 toxic chemicals) is obliged to provide information about the types and quantities of the chemical substance in question and the respective facility in which the activities are carried out to the **Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction** twice a year – no later than 1 March and 1 October (Art.13).⁶² A person who manufactures, processes, or uses a chemical substance listed in Annex 2 of the Act (i.e. CWC Schedule 2 toxic chemicals) is obliged to provide to the **Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction** twice a year – no later than 1 March and 1 October – the following information:

1. Information about the types and quantities of any Part A chemical substance marked with ‘*’ of which more than one kilogram is produced and the respective facility at which the activities are carried out;
2. Information about the types and quantities of any other Part A chemical substance of which more than one hundred kilograms are produced and the facility at which the activities are carried out;
3. Information about any Part B chemical substance of which more than one tone is produced and the facility at which the activities are carried out (Art. 14).

A person who manufactures a chemical substance listed in Annex 3 of the Act (i.e. CWC Schedule 3 toxic chemicals) in quantities that exceed thirty tones is obliged to provide information about the types and quantities of the manufactured chemical substance and the respective facility in which the activities are carried out to the **Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction** twice a year – no later than 1 March and 1 October.

A person who manufactures **unlisted** chemical substances through organic synthesis, where the total quantity of all manufactured substances for one calendar year exceeds two hundred tonnes is obliged to provide to the **Interministerial Commission for Export Control and Non-Proliferation of**

⁶¹ Bulgaria, Ministry of Economy, [Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction](#).

⁶² Bulgaria, [1540 Committee Matrix of Bulgaria](#), June 18, 2019; Bulgaria, Prohibition of Chemical Weapons and Control over Toxic Chemicals and Their Precursors Act [[Закон за забрана на химическото оръжие и за контрол на токсичните химически вещества и техните прекурсори](#)], Prom. SG 8/28 January 2000; last amed. SG 63/9 August 2019. The Annexes to the Act are based on Schedules I, II, and III of the Chemical Weapons Convention.

Weapons of Mass Destruction information about the types and quantities of the manufactured chemical substances and the facilities at which the respective activities are conducted once a year no later than 1 March (Art. 16 (1)). A person who manufactures through organic synthesis chemical substances that contain **sulfur, phosphorus, or fluorine**, where the quantity of the manufactured substance for one calendar year exceeds thirty tons is obliged to provide to the **Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction** information about the types and quantities of the chemical substances and the facilities at which the respective activities are conducted once a year no later than 1 March (Art 16. (2)). The **oversight** of activities involving toxic chemical substances and their precursors is exercised by the **Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction** which reviews the information provided in line with the requirements of the Act and carries out inspections of the facilities where activities involving toxic chemical substances are handled (Art. 21 (1)).

Ordinance No 16-437 on the Terms and Procedure for Conducting Activities Involving Toxic Chemical Substances and Their Precursors of 4 May 2007 obliges all natural or legal persons, as defined by the Commerce Act that manufacture, process, or use chemical substances listed in the Annexes of the Prohibition of Chemical Weapons and Control over Toxic Chemicals and Their Precursors Act to register with the Interministerial Commission for Export Control and Non-Proliferation of Weapons of Mass Destruction (Art. 2 (1)).⁶³ Section V of the Ordinance defines the general rules for the conduct of **international inspections** by the Technical Secretariat of the Organization for the Prohibition of Chemical Weapons.

The **Protection against the Harmful Impact of Chemical Substances Act** of 2000 seeks to guarantee the safe and environmentally-sound management of chemicals.⁶⁴ The Act sets out specific legal requirements for the labelling, packaging, classification, and marketing of hazardous chemical substances and the procedures for monitoring and control of hazardous chemical substances. This Act also implements Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH).⁶⁵

The **Ordinance on the Terms and Procedure for the Storage of Hazardous Chemical Substances** of 2011 defines the obligations of natural and legal persons that store hazardous chemical substances; the general requirements

⁶³ Bulgaria, Ministry of Economy, Letter No. 74-00-39 to the Center for the Study of Democracy, October 7, 2020; Bulgaria, Minister of Economy and Energy, Ordinance No 16-437 on the Terms and Procedure for Conducting Activities Involving Toxic Chemical Substances and Their Precursors [*Наредба № 16-437 от 4 май 2007 г. За условията и реда за извършване на дейности с токсичните химически вещества и техните прекурсори*], Prom. SG 40/18 May 2007; last amended. SG 42/28 May 2019.

⁶⁴ Bulgaria, Protection against the Harmful Impact of Chemical Substances Act [*Закон за защита от вредното въздействие на химичните вещества и смеси*], Prom. SG 10/4 February 2000; last amended. SG 102/23 December 2022.

⁶⁵ See Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH). For up-to-date information on the implementation of the EU REACH Regulation, see Ministry of Environment and Water, [REACH Procedures](#).

that the warehouses for joint storage of hazardous chemical substances have to meet; and the procedures for conducting safety assessment of the storage of hazardous chemical substances.⁶⁶

The **Ministry of Environment and Water** is among the competent authorities for the implementation of the national policy on the prevention of **industrial accidents** involving hazardous substances.⁶⁷ Chapter VII of the **Protection of the Environment Act** of 2002 addresses the prevention of large-scale industrial accidents and industrial pollution.⁶⁸ Preparedness for managing large-scale industrial accidents constitutes an important aspect of ensuring **ecological security** and mitigating the harmful consequences of the release of hazardous materials.

To reduce the risk of industrial accidents, including the likelihood of **deliberate incidents**, the operators of **facilities** and **enterprises** that are classified as having **low-** or **high-risk potential** are obliged to develop an institutional policy for enhancing safety and security within organizations. The institutional policy has to be accompanied by a set of appropriate approaches, measures, and management system requirements for ensuring occupational health and safety. Each facility or enterprise also has to develop an **emergency plan** that defines, procedures, steps and measures to be taken and followed in case of an accident. The **mayors** of the municipalities in the territory of which facilities and enterprises with high-risk potential are located prepare and, when necessary, implement emergency action plans. The **oversight** of the operation of enterprises and facilities with low- and high-risk potential is exercised through **joint inspections** by commissions set up by dint of order of the **Minister of the Environment and Water**. The **inspection commissions** comprise representatives of the Ministry of the Environment and Water, Ministry of Interior, Executive Agency “General Labour Inspectorate”, and municipal mayors. The commissions carry out inspections based on an annual plan. The frequency of inspections is determined in accordance with the results of a systematic risk assessment which is conducted at least annually at the enterprises and facilities with high-risk potential and once every three years at enterprises and facilities with low-risk potential. The **Ordinance on the Prevention of Large-Scale Accidents Involving Hazardous Substances and the Mitigation of Consequences Thereof** of 2016 defines the format of the internal safety policy, emergency plans, and risk assessment that the facilities and enterprises with low- and high-risk potential need to have in place.⁶⁹

⁶⁶ Bulgaria, Council of Ministers, Ordinance on the Terms and Procedure for the Storage of Hazardous Chemical Substances [[Наредба за реда и начина за съхранение на опасни химични вещества и смеси](#)], Prom. SG 43/7 June 2011, last amed. SG10/5 February 2021.

⁶⁷ Bulgaria, Ministry of Environment and Water, Letter No. 48-00-621 to the Center for the Study of Democracy, 9 October 2020.

⁶⁸ Bulgaria, Protection of the Environment Act [[Закон за опазване на околната среда](#)], Prom. SG 91/25 September 2002; last amed. SG 102/23 December 2022.

⁶⁹ Bulgaria, Council of Ministers, Ordinance on the Prevention of Large-Scale Accidents Involving Hazardous Substances and the Mitigation of Consequences Thereof [[Наредба за предотвратяване на големи аварии с опасни вещества и ограничаване на последствията от тях](#)], Prom. SG 5/19 January 2016; last amed. SG 62/5 August 2022.

The **Waste Management Act** adopted in 2012 defines the general legal framework for the management of hazardous wastes.⁷⁰ The properties of hazardous wastes are listed in Annex 3 of the Act. Wastes shall be classified as ‘hazardous’ if they are: 1) explosive; 2) oxidising; 3) flammable; 4) irritants causing skin irritation and eye damage; 5) toxic to specific organs or result in aspiration toxicity; 6) acutely toxic; 7) carcinogenic; 8) corrosive; 9) infectious; 10) toxic for reproduction; 11) mutagenic; 12) capable of releasing an acute toxic gas; 13) sensitising; 14) ecotoxic; 15) capable of exhibiting a hazardous property listed above not directly displayed by the original waste. Hazardous wastes that are not household wastes shall not be mixed with other wastes and shall be subject to strict procedures for safe management, whereby the personnel handling such wastes shall be properly trained (Art. 8). Any person involved in the production, collection, transport, treatment, trade, or brokerage of hazardous wastes is obliged to keep a certified register (Art. 44 (1)). They are further required to submit annual reports on their activities to the **Executive Environment Agency**. The **Regional Inspectorates of Environment and Water** are in charge of carrying out inspections to verify compliance with the established rules.⁷¹

Annex 1 of the **Ordinance No 2 on the Classification of Wastes** of 2014 lists types of hazardous wastes.⁷² Article 6 of the Ordinance refers to the Basel Convention with relation to the definition of ‘hazardous wastes’, as well as to the relevant provisions contained in the Waste Management Act. To facilitate the implementation of the Ordinance, the Ministry of the Environment and Water has published a *Manual on the Classification of Wastes*.⁷³

The **Updated National Action Plan for the Management of Persistent Organic Pollutants (POPs)** in Bulgaria adopted in 2012 sets out the general national policy framework for the implementation of the provisions of the Stockholm Convention, the Rotterdam Convention, and the Basel Convention.⁷⁴ The Basel Convention is also implemented through the national policy on waste management, including the **National Plan for Waste Management**.⁷⁵

Biological Safety and Security

Article 5 (4) of the **Constitution of the Republic of Bulgaria** states that any international instrument that has been ratified by the constitutionally established procedure, promulgated, and entered into force in Bulgaria, shall con-

⁷⁰ Bulgaria, Waste Management Act [[Закон за управление на отпадъците](#)], Prom. SG 53/13 July 2012; last amended. SG 100/16 December 2022.

⁷¹ Bulgaria, Ministry of Environment and Water, Letter No. 48-00-621 to the Center for the Study of Democracy, 9 October 2020.

⁷² Bulgaria, Minister of Environment and Water and Minister of Health, Ordinance No 2 on the Classification of Wastes [[Наредба № 2 от 23 юли 2014 г. за класификация на отпадъците](#)], Prom. SG 66/8 August 2014; last amended. SG 53/8 July 2022.

⁷³ Bulgaria, Ministry of Environment and Water, Manual on the Classification of Wastes [[Класификация на отпадъците](#)], September 2018.

⁷⁴ Bulgaria, Council of Ministers, Updated National Action Plan for the Management of Persistent Organic Pollutants (POPs), 2012-2020 [[Актуализиран Национален План за действие по управление на устойчивите органични замърсители \(УОЗ\) в България – 2012 – 2020](#)], August 2012.

⁷⁵ Bulgaria, Ministry of Environment and Water, Letter No. 48-00-621 to the Center for the Study of Democracy, 9 October 2020.

stitute part of the domestic legislation superseding any conflicting domestic legislation.⁷⁶ In line with these provisions, the **1975 Biological and Toxin Weapons Convention (BTWC)** is part of Bulgaria's **domestic legislation**.

In countering **biological risks**, Bulgaria recognises the value in adopting a one-health approach to health security. The **2004 Health Act** sets out the national legal framework for the provision of healthcare and disease control and prevention.⁷⁷ The **2005 Veterinary-Medical Activity Act** sets out the national legal framework for the conduct, management, and oversight of veterinary-medical activities and the implementation of the established EU and World Animal Health Organisation standards and principles in this area.⁷⁸ The **2014 Plant Protection Act** sets out the national legal framework for promoting plant health through the implementation of the phytosanitary measures established by the International Plant Protection Convention.⁷⁹

Ordinance No 21 on the Terms and Procedure for the Registration, Communication, and Reporting of Infectious Diseases of 2006 is an important element in the health security system which seeks to ensure effective disease surveillance, detection, early warning, and response to infectious disease outbreaks regardless of their origin.⁸⁰ The Ordinance specifically addresses the risk of **bioterrorism** and the emergence of new and unknown infectious diseases (Article 1 (2)). In case of a suspicious biological event involving a new or unknown disease, the Ordinance defines the procedures for taking appropriate response measures for reducing the impact of a potential epidemiological situation at national and regional level. These include sampling, rapid implementation of appropriate preventive and prophylactic strategies for limiting the spread of the disease, and timely and effective risk communication.⁸¹

The **National Action Plan for Pandemic Preparedness** adopted in 2020 seeks to establish the fundamentals of an effective system for:

- Reducing the contagion and mortality rates in case of a pandemic infection.
- Ensuring optimal conditions for healthcare provision.
- Ensuring the provision of vital social services such as healthcare, security, transport and others.

⁷⁶ Bulgaria, Constitution of the Republic of Bulgaria [[Конституция на Република България](#)], Prom. SG 56/13 July 1991; amended. SG 100/18 December 2015; Bulgaria, [1540 Committee Matrix of Bulgaria](#), 18 June 2019.

⁷⁷ Bulgaria, Health Act [[Закон за здравето](#)], Prom. SG 70/10 August 2004; last amended. SG 104/30 December 2022.

⁷⁸ Bulgaria, Veterinary-Medical Activity Act [[Закон за ветеринарномедицинската дейност](#)], Prom. SG 87/1 November 2005; last amended. SG 102/23 December 2022.

⁷⁹ Bulgaria, Plant Protection Act [[Закон за защита на растенията](#)], Prom. SG 61/25 July 2014; last amended. SG 102/23 December 2022.

⁸⁰ Bulgaria, Minister of Health, Ordinance No 21 on the Terms and Procedure for the Registration, Communication, and Reporting of Infectious Diseases [[Наредба № 21 от 18 юли 2005 г. За реда за регистрация, съобщаване и отчет на заразните болести](#)], Prom. SG 62/29 July 2005; last amended. 15 July 2022.

⁸¹ Bulgaria, Ministry of Healthcare, Letter No. 74-00-405 to the Center for the Study of Democracy, 5 October 2020.

- Ensuring the continuous broadcasting and dissemination of reliable, and up-to-date information regarding the course of a pandemic and the relevant measures that have been undertaken.⁸²

The Action Plan underscores the need for a **whole-of-government** approach, whereby a lead role in the implementation and coordination of pandemic response activities plays the **Ministry of Health**. Other competent authorities implement relevant activities and response measures within their respective mandates in accordance with the **National Program for Disaster Risk Reduction**.⁸³

Ordinance No 4 on the Protection of Workers against the Risks Related to the Exposure of Biological Agents of 2002 sets out the minimal biosafety requirements that need to be met for work involving exposure to biological agents.⁸⁴ Biological agents are categorized in four groups depending on the level of infection risk they pose as follows:

- **Group 1:** biological agents that do not cause disease in humans.
- **Group 2:** biological agents that can cause disease in humans and pose a hazard to those working with and being directly exposed to them; however, the likelihood of the disease spreading within the community is very low and usually effective preventive measures and counter-measures for its treatment exist.
- **Group 3:** biological agents which can cause severe disease in humans and pose a serious hazard to those working with or being directly exposed to them; there is a risk that the disease can spread within the community but usually effective preventive measures and counter-measures for its treatment exist.
- **Group 4:** biological agents that cause severe disease in humans and pose a serious hazard to those working with or being exposed to them; there is a high risk that the disease can spread within the community and neither effective preventive measures, nor counter-measures for its treatment exist.

Annex 1 of the Ordinance contains a list of biological agents per risk category. If a biological agent is not featured in the list and can be assigned to more than one risk categories, it is assigned to the higher-risk category (Art. 3 (3)). The Ordinance further sets out the procedures for conducting **biosafety risk assessment**.

⁸² Bulgaria, Ministry of Health, National Action Plan for Pandemic Preparedness [[Национален план на Република България за готовност при пандемия](#)], 2 December 2020.

⁸³ Bulgaria, Ministry of Health, National Action Plan for Pandemic Preparedness [[Национален план на Република България за готовност при пандемия](#)], 2 December 2020.

⁸⁴ Bulgaria, Minister of Labour and Social Policy and Minister of Health, Ordinance No 4 on the Protection of Workers against the Risks Related to the Exposure of Biological Agents [[Наредба № 4 от 14 октомври 2002 г. за защита на работещите от рискове, свързани с експозиция на биологични агенти при работа](#)], Prom. SG 105/8 November 2002; last amended. SG 100/24 November 2020.

Instruction No 5 on Work Involving Agents Causing Bacteriological, Fungal, or Viral Infections with a High Medical and Epidemic Risk of 2003 sets out the rules for work with high-risk pathogens.⁸⁵ Article 2 contains a list of the **select agents** covered by the provisions of the Instruction. Work with high-risk pathogens is carried out at national reference laboratories, designated units of the Regional Inspectorate on Public Health Protection and Control; and specialised public laboratories outside the system of the Ministry of Health. The Instruction details the biosafety requirements, the rules of work with laboratory animals, and the procedures that need to be followed in case of a laboratory accident.

Ordinance No 69 on the Requirements for Good Production Practice in the Manufacturing or Veterinary-Medical Products and Active Substances of 2006 sets out the criteria for quality control, personnel, facilities and equipment, administration, manufacturing, and self-inspections which define the elements of Good Production Practice.⁸⁶ The **oversight** of the implementation of the requirements for Good Production Practice under this Ordinance is carried out by the **Bulgarian Food Safety Agency (BFSA)**.

Ordinance No 8 on Phytosanitary Control of 2015 sets out the procedures for phytosanitary control and the required security measures for preventing the introduction and dissemination of quarantine plant pests and plant products in Bulgaria and other EU Member States during the import and transit of plants and plant products; the export and re-export of plants and plant products; the manufacturing, processing, breeding, and movement of plants and plant products.⁸⁷ Annex 1 of the Ordinance lists plant pests that are prohibited for import and dissemination in the Bulgaria. The **Bulgarian Agency for Food Safety** is the principal national authority for phytosanitary control.

The **Genetically Modified Organisms (GMOs) Act** of 2005 sets out the national legal framework for working with GMOs in a controlled environment; their release in the environment; marketing, import, export, and transit of GMOs; and the oversight of activities involving GMOs.⁸⁸ The Act adopts a precautionary principle, whereby the protection of the environment and ensuring public health are chief priorities. The main competent authorities involved in the implementation of the national policy regarding GMOs are the **Ministry of Environment and Water** and the **Ministry of Agriculture** (Art. 3). The Minister of Environment and Water issues, amends, and revokes permits for work with GMOs in a controlled environment and the release of GMOs in the environment; and keeps a register of the facilities where work

⁸⁵ Bulgaria, Minister of Health, Instruction No 5 on Work Involving Agents Causing Bacteriological, Fungal, or Viral Infections with a High Medical and Epidemic Risk [*Инструкция № 5 от 19 ноември 2003 г. за работа с причинители на бактериални, гъбични и вирусни инфекции с висок медицински и епидемичен риск*], Prom. SG 105/2 December 2003.

⁸⁶ Bulgaria, Minister of Agriculture and Forestry, Ordinance No 69 on the Requirements for Good Production Practice in the Manufacturing or Veterinary-Medical Products and Active Substances [*Наредба № 69 от 16 май 2006 г. за изискванията за добрата производствена практика при производство на ветеринарномедицински продукти и активни субстанции*], Prom. SG 49/16 June 2006; last amended. SG 48, 18 June 2019.

⁸⁷ Bulgaria, Minister of Agriculture and Food, Ordinance No 8 on Phytosanitary Control [*Наредба № 8 от 27 февруари 2015 г. за фитосанитарния контрол*], Prom. SG 19/13 March 2015; last amended. SG 66/20 August 2019.

⁸⁸ Bulgaria, Genetically Modified Organisms Act [*Закон за генетично модифицирани организми*], Prom. SG 27/29 March 2005; last amended. SG 102/23 December 2022.

with GMOs in a controlled environment is conducted (Art. 4 (1)). The Minister of Environment and Water is assisted by an **advisory expert committee** comprising 15 members specializing in the area of molecular biology, genetics, ecology, biotechnology, agronomics, stockbreeding, biology, and medicine (Art. 6-7). The Minister of Agriculture issues, amends, and revokes permits for the marketing of GMOs or products containing GMOs (Art. 5).

The **Ordinance on the Release of Genetically Modified Organisms in the Environment and Their Marketing** of 2005 defines the rules and procedures for the open release and marketing of GMOs.⁸⁹ No permits have been issued for the release of GMOs in the environment in Bulgaria.⁹⁰ The **Ordinance on Work with Genetically Modified Organisms in a Controlled Environment** of 2005 sets out the terms and procedures for conducting risk assessment for work with GMOs, the required laboratory biosafety measures, including requirements for waste management and personal protective equipment, and the format of relevant paperwork that needs to be filed for the purpose of licensing. The **Ministry of Environment and Water** maintains a **register** of the facilities where activities involving GMOs are conducted and a **register** on the permits for work with GMOs in a controlled environment.⁹¹ There are eight registered facilities where work with GMOs is carried out. The implementation of the existing mechanisms for oversight of work involving GMOs is described in the **Instruction on the Organisation and Procedure for Exercising Oversight of Work Involving GMOs in a Controlled Environment and Their Release in the Environment by the MOEW Structures** of 2012.⁹²

⁸⁹ Bulgaria, Council of Ministers, Ordinance on the Release of Genetically Modified Organisms in the Environment and Their Marketing [[Наредба за освобождаване на генетично модифицирани организми в околната среда и пускането им на пазара](#)], Prom. SG 81/11 October 2005; amended. SG 20/9 March 2021.

⁹⁰ Bulgaria, Ministry of Environment and Water, GMO Registers [[Регистри ГМО](#)].

⁹¹ Bulgaria, Ministry of Environment and Water, GMO Registers [[Регистри ГМО](#)].

⁹² Bulgaria, Ministry of Environment and Water, Letter No. 48-00-621 to the Center for the Study of Democracy, October 9, 2020.

THE MEDIA SECTOR AND HYBRID THREATS

The **Constitution of the Republic of Bulgaria** asserts the fundamental principle of freedom of expression and guarantees the right of free speech and the right to information for all spheres of public life, including journalism. The Constitution also affirms the freedom of media as well as the individual and collective right of citizens to seek, obtain, and disseminate information. These rights are not absolute and cannot be exercised to the detriment of the rights or legitimate interests of others, or to the detriment of national security, public order, public health and morality.⁹³ The **Criminal Code** establishes liability for the spread of false alerts. A person who uses radio, telephone or other means to transmit false or misleading alerts shall be punished by imprisonment of up to two years (Art. 326 (1)). If such an act has resulted in significant harmful consequences, the penalty shall be imprisonment for up to five years and a fine of ten thousand to fifty thousand leva (Art. 326 (2)).⁹⁴

Disinformation is defined as “verifiably false or misleading information that is created, presented and disseminated for economic gain or to intentionally deceive the public, and may cause public harm. Public harm comprises threats to democratic political and policy-making processes as well as public goods such as the protection of citizens' health, the environment or security. Disinformation does not include reporting errors, satire and parody, or clearly identified partisan news and commentary.”⁹⁵

There is **no common EU regulatory framework** for countering disinformation and efforts thus far have focused on enhancing the transparency and reliability of the online media system, fostering media literacy, supporting quality journalism, and promoting strategic communication. Following the Russian invasion of Ukraine, the EU has enforced **sanctions** against several Russian state-owned media outlets involved in the intentional spread of propaganda and disinformation.⁹⁶ The sanctions prevent broadcasting on the territory of the EU and cover all means of transmission and distribution, including cable, satellite, Internet Protocol TV, platforms, websites and apps.

In Bulgaria, the **Radio and Television Act** contains provisions for restricting the broadcasting of content that incites violence, hate, or terrorism (Art. 8).⁹⁷ These provisions apply to radio and television broadcasters, as well as to video sharing platforms. This Act does not explicitly cover disinformation but asserts the principles and standards of journalistic ethics and obliges

⁹³ Bulgaria, Constitution of the Republic of Bulgaria [Конституция на Република България], Prom. SG 56/13 July 1991; last amended. SG 100/18 December 2015, Art. 39-41.

⁹⁴ Bulgaria, Criminal Code [Наказателен кодекс], Prom. SG 26/2 April 1968; last amended. SG 79/4 October 2022.

⁹⁵ European Commission, Communication “Tackling online disinformation: a European approach”, April 2018.

⁹⁶ Council of the European Union, “Why has the EU sanctioned some media outlets?”, – In: “EU sanctions against Russia explained”.

⁹⁷ Bulgaria, Radio and Television Act [Закон за радиото и телевизията], Prom. SG 138/24 November 1998; last amended. SG 104/30 December 2022.

media service providers to observe these principles and standards (Box 2). The standards for journalistic ethics are the primary framework that guides the conduct of print media.

Box 2. Code of Ethics of the Bulgarian Media – Key Elements

Provision of reliable information to the public. The media agree to provide accurate and verifiable information, to explicitly distinguish facts from comments and confirmed from non-confirmed information, to provide diverse views when covering discussions and to make a disclaimer when the information has been manipulated. In case of mistake, the media commit to publish visible and clearly identifiable correction and to grant the right to response to those who were affected. The media also agree to seek diverse sources of information and give preference to identified sources before anonymous ones.

Collection and presentation of information. The media agree to use legal and fair means for collecting information and not to obtain information by threats, coercion, or exorciation. News should be presented with due respect to everyone's privacy and publication of photos or videos not taken in public places should be avoided unless the persons featuring in them have given their consent.

Editorial independence. Media content should not be subject to political or economic influence or pressure.

Relations within and between the media. Mutual respect and fair competition among the media should be respected.

Public interest. A violation of the principles laid down in this code can be justified only in cases where it can be proven, beyond a reasonable doubt, that the violation "has been in the public interest". According to the code, a piece of information is in the public interest only if it: (a) helps protect health, safety and security; (b) helps prevent or uncover serious crime or abuse of power; or (c) protects the public from being seriously misled.

Source: Bulgaria, National Council for Journalism Ethics, Code of Ethics of the Bulgarian Media, 25 November 2004.

The public authority tasked with the enforcement of the Radio and Television Act is the **Council on Electronic Media**.⁹⁸ In terms of media content, the Council's activities are limited to specific functions, including, among others, the supervision of service providers' compliance with the basic principles of freedom of expression, right to information, protection of confidentiality of sources, non-dissemination of content that inspires hatred or contradicts morality, compliance with copyrights, protection of the purity of Bulgarian language, and observance of the right to respond. The Council is authorized to monitor the content released by national broadcasters and issues guidelines

⁹⁸ Bulgaria, Radio and Television Act [[Закон за радиото и телевизията](#)], Prom. SG 138/24 November 1998; last amended. SG 104/30 December 2022.

on good media practices. It also has sanctioning powers and can impose financial fines in cases of violation of the Radio and Television Act. There is a special provision that media service providers can be sanctioned by a fine of between BGN 2,000 and BGN 5,000 (approximately between EUR 1,000 and EUR 2,500) for failing to comply with a decision of one of the ethics bodies listed in the Act (Art.126d). In cases of severe violations of the basic principles of radio and television, the Council has the ultimate power to permanently revoke the license of the media service provider (Art. 122).

Media broadcasters and publishers are obliged to **ensure that information regarding their owners is publicly available and accessible**. As a general rule, offshore companies are not allowed to establish or acquire an interest of 10 % or more in a legal person that is a publisher of periodical printed matter or that is in the process of obtaining or already holds a broadcasting license.⁹⁹

The print media are required to provide information about the beneficial owner in the first issue of each year (and in the first coming issue in case of ownership change) and on their official website. Media publishers are also required to declare all received funding (e.g. amount, purpose, source) and any public office positions that the beneficial owner may hold. These declarations are to be submitted on an annual basis and within a 7-day period in case of ownership change. The competent authority that oversees compliance with these requirements is the **Ministry of Culture**.¹⁰⁰

The electronic media (e.g. radio, television, video sharing platforms) are subject to **license checks and verification**, as part of which their owners are required to declare the origin of their assets; the structure and distribution of ownership powers and responsibilities; and any involvement in other media enterprises. Failure to demonstrate the origin of relevant capital and assets can result in the license revocation. Information about the persons overseeing the management of the broadcasting operator, the composition of management bodies, and the beneficial owner must be available in the public register.¹⁰¹ The competent authority overseeing the licensing of the electronic media service providers is the Council for Electronic Media.

⁹⁹ Bulgaria, Economic and Financial Relations with Companies Registered in Jurisdictions with Preferential Tax Treatment, Their Controlled Entities and Their Beneficial Owners Act [[Закон за икономическите и финансовите отношения с дружествата, регистрирани в юрисдикции с преференциален данъчен режим, контролираните от тях лица и техните действителни собственици](#)], Prom. SG 1/3 January 2014; last amed. SG 94/13 November 2018.

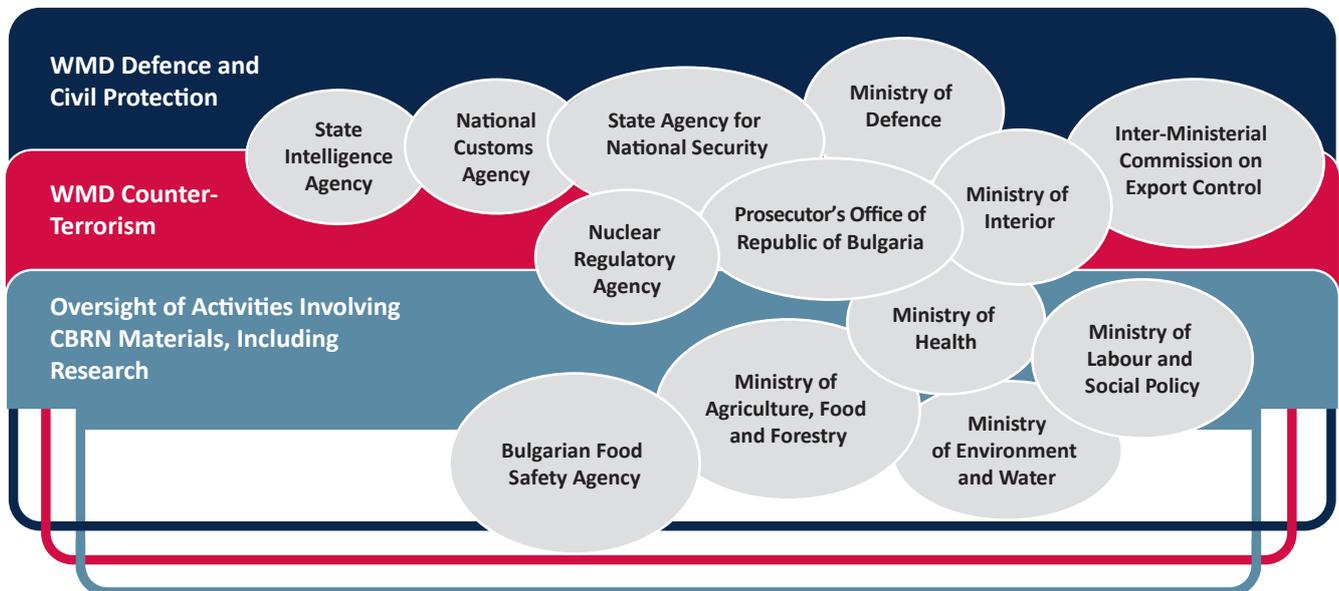
¹⁰⁰ Bulgaria, Compulsory Deposit of Printed and Other Works and Notification of Media Service Distributors and Providers Act [[Закон за задължителното депозиране на печатни и други произведения и за обявяване на разпространителите и доставчиците на медийни услуги](#)], Prom. SG 108/29 December 2000; amed. SG 31/19 April 2022.

¹⁰¹ Bulgaria, Radio and Television Act [[Закон за радиото и телевизията](#)], Prom. SG 138/24 November 1998; last amed. SG 104/30 December 2022. The public register is accessible online through the [website](#) of the Council of Electronic Media.

CONCLUSION

Building resilience to WMD hybrid threats requires effective action on multiple levels.¹⁰² Bulgaria must **prepare an actionable plan** to ensure the long-term capacity sustainability of the existing systems and mechanisms for countering WMD-related hybrid threats (Figure 1). International cooperation within bodies such as the EU and NATO is essential for the development of a unified and robust approach to countering foreign malign influence operations, that is also capable of deterring the use of disinformation as a weapon. Good governance and **resilient institutional and digital security infrastructure** is a first-line of defense and an essential precondition for preventing state and media capture and countering hybrid threats. **Preventive measures**, besides typical counterintelligence and counterterrorism measures, include initiatives and campaigns to enhance media literacy and public sensitivity to social manipulation (e.g. fact-checking), efforts to strengthen strategic communication, and standard-setting initiatives that advance quality journalism and responsible media coverage. Enforcing regulatory compliance to promote the **transparency of media ownership and funding** is a key step toward improving the media landscape within countries and reducing the risk of media capture.

Figure 1. Bulgaria's Institutional Framework for Countering WMD-related Hybrid Threats



Source: CSD.

¹⁰² Center for the Study of Democracy, *Countering Hybrid Threats in Bulgaria*, Policy Brief No. 118, November 2022.

An **effective regulatory and institutional framework** for preventing and countering WMD hybrid threats at the national level should, *inter alia*:

- Be based on a whole-of-government, cross-thematic approach to dealing with influence operations that fosters coordination among government agencies and tackles the technical (e.g. cybersecurity) as well as political-economic aspects of foreign disinformation activities.
- Provide for the periodic review of the policy and legal instruments aimed at combating the misuse of WMD materials, as well as any related information, to ensure that the established mechanisms and provisions are up-to-date.
- Ensure that security-sector institutions, including those responsible for intelligence-gathering, law enforcement, and criminal justice, are well-resourced and equipped to identify, detect, investigate, and prosecute incidents involving the use of WMD materials.
- Promote inter-agency cooperation and inter-operability during the response and investigation of suspected use of WMD materials.
- Guarantee the availability of technical infrastructure, equipment, and expertise necessary for identifying and analyzing suspected use of WMD materials.
- Ensure that strategic communications units on the ministerial and local governance level are well-equipped to raise awareness and clarify policy initiatives aimed at combating disinformation in a timely and consistent manner.
- Leverage specific social media capabilities in the national language and promote cooperation with major social media platforms and national IT associations to foster shared understanding of external threats.
- Adopt technology solutions via public-private partnerships with the IT sector to detect and investigate recurrent disinformation and the actors that produce and amplify it.
- Establish mechanisms for cooperation and exchange of information with civil society, including academia, to facilitate the analysis of disinformation threats and the identification of options to effectively counter them.

Civil society, including the **private sector**, plays a vital role in ensuring wide access to trustworthy and verifiable information, quality reporting, and media monitoring. Key initiatives that civil society stakeholders can undertake include:

- Developing fact-checking tools and platforms to facilitate the identification of disinformation narratives.
- Adopting and promoting voluntary (self-regulatory) mechanisms for reporting disinformation and strengthening ethical and responsible journalism.
- Developing, implementing, and popularizing technological solutions and data-driven methods for analysis and media monitoring to identify recurrent disinformation narratives.
- Enhancing public engagement to raise awareness of disinformation threats, and to demonstrate how these threats can be addressed and countered.
- Establishing a platform for the development of sustainable business models for independent media.
- Developing tools and resources for teaching information literacy, geared to various target audiences.

