

# Bulgaria



## SUMMARY OF FINDINGS

### 1. Industry Participation in Policy Development

Bulgaria still lacks specific regulations to address the influence of the tobacco industry (TI) in the development and implementation of tobacco control policies. Although no concrete evidence was found of direct TI interference in public health or tobacco control decision-making, there is clear documentation of TI involvement in shaping tobacco excise tax policy, which indirectly impacts public health outcomes.

Bulgaria's official delegation to FCTC COP10 did not include TI representatives. A national council for tobacco control has yet to be established.

### 2. Industry CSR Activities

There is considerable evidence that government agencies or officials have endorsed, supported, partnered with, or taken part in tobacco industry activities presented as corporate social responsibility (CSR).

### 3. Benefits to the Industry

Excise duties on tobacco products saw only a minimal increase in 2023, following an Excise Tax Calendar adopted in 2022 through close consultation with TI representatives. A further, slightly steeper increase has been proposed for 2025, aligned with Bulgaria's efforts to join the eurozone, and crafted to avoid negatively impacting the TI's interests.

Meanwhile, the annual aid budget for tobacco growers in 2024 reached 71 million BGN (approximately 35.5 million euros), representing a 1 million BGN (around 500,000 euros) increase compared to 2023.

### 4. Unnecessary Interaction

Senior state officials, including the President, government ministers, and Members of Parliament, continue to participate in economic and environmental forums sponsored by tobacco companies, both in Bulgaria and abroad.

Bulgarian law does not prohibit TI sponsorship or corporate social responsibility (CSR) activities, and awareness of Article 5.3 of the WHO FCTC remains low.

In 2023, the government continued to rely on the TI for assistance in measuring illicit trade in tobacco products. However, responses to requests under the Access to Public Information Act indicate that ministries have no formal partnerships or non-binding agreements with the TI.

### 5. Transparency

Bulgaria still lacks a law on lobbying and does not maintain a lobby register. There is no transparency regarding government interactions with the TI. Official meetings with TI representatives are neither disclosed on ministry websites nor are the minutes publicly available. Most interactions come to light only through parliamentary inquiries, access to information requests, or media reports.

### 6. Conflict of Interest

The Act on Political Parties and the Electoral Code prohibit legal entities from financing political party activities and election campaigns, with oversight provided by the Audit Office. No evidence has been found that retired senior government officials currently hold positions in the TI in Bulgaria.



## 7. Preventive Measures

No preventive measures exist within the Ministries of Economy, Finance, Health, and Education for disclosing records of interactions with the TI. The current Code of Conduct for Public Administration Employees does not include provisions specific to the TI.

While tobacco companies are legally required to disclose certain product information, there are no reporting obligations regarding market share, marketing expenditures, lobbying activities, or philanthropic contributions.

There is also no government system for raising awareness among public administration employees about Article 5.3 of the WHO FCTC. Public officials do not receive training on its implementation.

## RECOMMENDATIONS

1. Develop a National Tobacco Control Strategy with a defined timetable, measurable performance indicators, responsible agencies, and adequate funding to ensure implementation of all WHO FCTC recommendations.
2. Establish a state body to coordinate the implementation of the National Strategy, excluding TI participation.
3. Introduce measures to protect public health policies from TI interference, including a government-adopted program to raise awareness of Article 5.3 of the WHO FCTC and its guidelines, with training for civil servants to understand, recognize, and comply with these policies.
4. Enact a law on lobbying and create a lobbyist register with mandatory disclosure of funding and lobbying purposes, excluding public interest advocacy from its scope.