



Convention on the Rights of the Child

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Committee on the Rights of the Child

Concluding observations on the combined sixth and seventh periodic reports of Bulgaria*

I. Introduction

1. The Committee considered the combined sixth and seventh periodic reports of Bulgaria¹ at its 2762nd and 2763rd meetings,² held on 17 and 18 January 2024, and adopted the present concluding observations at its 2786th meeting, held on 2 February 2024.
2. The Committee welcomes the submission of the combined sixth and seventh periodic reports of the State party, under the simplified reporting procedure, which allowed for a better understanding of the situation of children's rights in the State party. The Committee expresses its appreciation for the constructive dialogue held with the high-level and multisectoral delegation of the State party.

II. Follow-up measures taken and progress achieved by the State party

3. The Committee welcomes the measures taken to implement the Convention, including amendments to the Child Protection Act (in 2020), the Family Allowances Act (from 2016 to 2023), the Preschool and School Education Act (in 2020), the Labour Code (in 2022), the Family Code (in 2023), the Protection against Domestic Violence Act (in 2023), the Criminal Procedure Code (in 2023), the Foreigners in the Republic of Bulgaria Act (in 2018), the Asylum and Refugees Act (in 2020) and the Support and Financial Compensation for Victims of Crime Act (in 2023); and the adoption of the Social Services Act 2019, the Persons with Disabilities Act 2018, the Personal Assistance Act 2018, the National Strategy for the Child 2024–2030, the Action Plan for the Implementation of Council Recommendation (EU) 2021/1004 establishing a European Child Guarantee (by 2030), the National Programme for the Prevention of Violence and Child Abuse (2023–2026), the National Strategy for Poverty Reduction and the Promotion of Social Inclusion (until 2030), the National Strategy for Persons with Disabilities (2021–2030), the National Youth Strategy (2021–2030), and the updated action plan of 2016 for the implementation of the national strategy entitled “Vision for the Deinstitutionalization of Children in the Republic of Bulgaria”.

III. Main areas of concern and recommendations

4. The Committee reminds the State party of the indivisibility and interdependence of all the rights enshrined in the Convention and emphasizes the importance of all the recommendations contained in the present concluding observations. The Committee would

* Adopted by the Committee at its ninety-fifth session (15 January–2 February 2024).

¹ [CRC/C/BGR/6-7](#).

² See [CRC/C/SR.2762](#) and [CRC/C/SR.2763](#).



like to draw the State party's attention to the recommendations concerning the following areas, in respect of which urgent measures must be taken: non-discrimination (para. 17), freedom of the child from all forms of violence (para. 26), children deprived of a family environment (para. 31), education (para. 39), asylum-seeking, refugee and migrant children (para. 41) and child justice (para. 46).

5. **The Committee recommends that the State party ensure the realization of children's rights in accordance with the Convention, the Optional Protocol on the involvement of children in armed conflict and the Optional Protocol on the sale of children, child prostitution and child pornography throughout the process of implementing the 2030 Agenda for Sustainable Development. It urges the State party to ensure the meaningful participation of children in the design and implementation of policies and programmes aimed at achieving all 17 Sustainable Development Goals as far as they concern children.**

A. General measures of implementation (arts. 4, 42 and 44 (6))

Legislation

6. **The Committee recommends that the State party:**

(a) **Take the necessary measures to fully align national legislation with the Convention and address any inconsistencies;**

(b) **Ensure the effective implementation of the Law on Normative Acts with regard to preliminary impact assessments of new legislation or amendments to legislation, and develop mandatory child rights impact assessment procedures also for any proposed policy, regulatory, budget, international cooperation or other administrative decision relevant to children.**

Comprehensive policy and strategy

7. **The Committee takes note of the information provided by the State party regarding the draft National Strategy for the Child 2024–2030, but remains deeply concerned about the lack of progress in adopting the strategy. The Committee recommends that the State party:**

(a) **Adopt a comprehensive policy and action plan on children's rights, with the participation of children, that encompasses all areas covered by the Convention and includes specific, time-bound and measurable goals;**

(b) **Provide adequate human, technical and financial resources for the implementation and monitoring of the policy and action plan, including through accountability mechanisms and regular monitoring and evaluation;**

(c) **Implement systemic reforms in areas affecting children, such as violence, child justice, reproductive health, and protection of children in disadvantaged situations, including Roma, refugee, asylum-seeking, migrant, and lesbian, gay, bisexual, transgender and intersex children.**

Coordination

8. **Noting that the State Agency for Child Protection and the National Council for Child Protection are responsible for coordinating policies related to children, the Committee recommends that the State party provide these entities with sufficient authority, adequate resources and a clear mandate to coordinate all activities regarding the implementation of the Convention across all sectors and at all levels.**

Allocation of resources

9. **Noting with appreciation the increased budget allocations for sectors relevant to children, including education and health, the Committee recommends that the State party:**

(a) Establish a budgeting process with a child rights perspective and clear allocations for children in the relevant sectors and agencies, including specific indicators and a tracking system for the allocation, use and monitoring of resources for children;

(b) Establish mechanisms for monitoring and evaluating the adequacy, efficacy and equitability of the distribution of resources allocated for the implementation of the Convention and its Optional Protocols;

(c) Ensure transparent and participatory budgeting, including at the local level, in which civil society and children can participate effectively.

Data collection

10. The Committee recommends that the State party:

(a) Strengthen its national information system on children to allow for the sufficient monitoring and analysis of the situation of children, including through the allocation of sufficient resources and the adoption of a child rights monitoring framework to systematize the monitoring and analysis of data on children;

(b) Ensure that the data collected encompass all areas of the Convention and are disaggregated by age, sex, disability, geographical location, ethnic origin, nationality and socioeconomic background;

(c) Improve the collection, quality and analysis of data on child marriages, violence against children, child mental health, child labour, child justice, and the situation of children in disadvantaged situations, including Roma children, children with disabilities, children in alternative care and asylum-seeking and migrant children;

(d) Ensure that the statistical data are shared among relevant ministries, professional groups and civil society organizations and are used for the formulation and evaluation of policies and projects on children's rights;

(e) Continue its cooperation with the United Nations Children's Fund (UNICEF) and other relevant entities in this regard.

Access to justice and remedies

11. The Committee recommends that the State party:

(a) Ensure that all children have access to: (i) confidential, child-friendly and independent complaint mechanisms in schools, foster care systems, alternative care settings and detention for reporting all forms of violence, abuse, discrimination and other violations of their rights; and (ii) legal support and age-appropriate information on access to counselling and remedies, including compensation and rehabilitation;

(b) Raise awareness among children of their right to file a complaint under existing mechanisms;

(c) Ensure capacity-building for judges, prosecutors, police officers and other professionals working with children in the justice system on child-friendly justice procedures, children's rights and the Convention.

Independent monitoring

12. The Committee recommends that the State party significantly increase its resources allocated to the child rights directorate of the Office of the Ombudsman, with a view to ensuring that it has adequate and sustainable human, technical and financial resources to allow it to effectively carry out its mandate in full compliance with the principles relating to the status of national institutions for the promotion and protection of human rights (the Paris Principles).

Dissemination, awareness-raising and training

13. The Committee recommends that the State party:

- (a) Strengthen its awareness-raising activities on children's rights among the public, with the involvement of children;
- (b) Ensure systematic and mandatory training on children's rights, the Convention and the Optional Protocols thereto for all professionals working for and with children, in particular those working in the public administration, education, social work, law enforcement, immigration and justice.

Cooperation with civil society

14. Noting with concern the anti-human rights rhetoric among decision-makers and increased opposition to civil society engagement in children's rights matters, the Committee recommends that the State party strengthen the participation of civil society organizations, children's organizations and child human rights defenders in children's rights matters and in the development, implementation, monitoring and evaluation of policies, programmes and legislation related to children's rights.

Children's rights and the business sector

15. The Committee recommends that the State party:

- (a) Assess the impact of the Corporate Social Responsibility Strategy 2019–2023 to inform the development of a new strategy that includes activities specifically on children's rights;
- (b) Ensure the legal accountability of business enterprises and their subsidiaries operating in or managed from the State party's territory in relation to international and national human rights, labour, environmental and other standards;
- (c) Require companies to undertake assessments of, consultations on and full public disclosure of the environmental, health-related and children's rights impacts of their business activities and their plans to address such impacts.

B. General principles (arts. 2, 3, 6 and 12)**Non-discrimination**

16. The Committee notes the establishment of a permanent working group in the Commission for Protection against Discrimination to address discrimination against children, but remains deeply concerned about persistent discrimination against Roma children, children from racial minorities, children with disabilities, and other groups of children in disadvantaged situations.

17. The Committee urges the State party to:

- (a) Implement targeted policies and programmes to eliminate discrimination against children in disadvantaged situations, especially Roma children, children living in poverty, children with disabilities, children in residential care, asylum-seeking and refugee children, and children in situations of migration;**
- (b) Ensure the access of Roma children and children in remote areas to adequate health services, education, housing and an adequate standard of living;
- (c) Consider establishing protocols to prevent and condemn hate speech by public officials and politicians, and to investigate incidents of racist hate speech and racially motivated violence;
- (d) Strengthen the capacity of the Commission for Protection against Discrimination, including by increasing its visibility and the scope of its work, with a view to addressing cases of discrimination against children and considering claims brought by children, with or without an adult representative;

(e) Ensure that children who experience discrimination, bullying or harassment in relation to their racial background, ethnicity, sexual orientation or gender identity receive protection and support, including through targeted anti-bullying measures;

(f) Address discriminatory stereotypes against refugee and migrant children, children with disabilities and lesbian, gay, bisexual, transgender and intersex children and promote a positive image of them as rights holders;

(g) Evaluate, with the participation of children and civil society organizations, existing measures aimed at combating discrimination against children in disadvantaged situations to assess their effectiveness, and revise the measures as needed.

Best interests of the child

18. Noting with concern the insufficient capacity of professionals to apply the principle of the best interests of the child, the Committee recommends that the State party:

(a) Ensure that the principle of the best interests of the child is consistently applied in all policies, programmes and legislative, administrative and judicial proceedings affecting children, including in relation to placement in care, domestic violence, parental disputes, custody, trafficking in children, child justice, and migration and asylum procedures;

(b) Strengthen the capacity of all relevant professionals, including through systematic training, to assess and determine the best interests of the child as a primary consideration.

Right to life, survival and development

19. The Committee notes with appreciation the progress achieved in reducing infant mortality rates but remains concerned about infant and under-5 mortality rates among Roma families and families in rural areas. The Committee recommends that the State party strengthen efforts to reduce, and address the underlying determinants of, infant and child mortality rates, especially in regions with larger Roma populations and rural areas, and as a result of road accidents.

Respect for the views of the child

20. Noting with concern that children's views are not systematically taken into account in decisions affecting them, including in national and local decision-making, the Committee recommends that the State party:

(a) Promote the meaningful and empowered participation of all children, including children below 10 years of age, Roma children, children with disabilities, children in alternative care and migrant children, within the family, communities and school settings and in policymaking at the local and national levels; and address the norms and harmful attitudes that discourage their participation;

(b) Ensure the right of all children to express their views and to have them taken into account in all decisions affecting them, including in courts and relevant administrative and judicial proceedings and regarding domestic violence, adoption, custody, placement in alternative care and justice;

(c) Develop procedures and guidelines for relevant professionals on ensuring that proceedings are child-friendly and that due weight is given to the views of children, and ensure that they receive appropriate training on the right of the child to be heard;

(d) Ensure that information on child-related laws and policies is available in child-friendly language.

C. Civil rights and freedoms (arts. 7, 8 and 13–17)

Nationality and statelessness

21. While welcoming the withdrawal in 2020 of the State party's reservation under article 31 (Law on Withdrawal of the Reservation, of 2020) of the 1954 Convention relating to the Status of Stateless Persons, the Committee urges the State party to further consider the withdrawal of its reservations to articles 7, 21, 23, 24, 27 and 28 of the 1954 Convention.

Right to identity

22. The Committee recommends that the State party ensure that, in instances where a child is born through assisted reproduction technologies, the child is able to access information about their origin as well as appropriate counselling and support.

Access to appropriate information

23. Recalling its general comment No. 25 (2021) on children's rights in relation to the digital environment, the Committee recommends that the State party:

- (a) Ensure that laws and policies on access to information and the digital environment protect children from harmful content and online risks and respect their privacy;
- (b) Continue to strengthen the digital literacy and skills of children, parents, caregivers and teachers.

D. Violence against children (arts. 19, 24 (3), 28 (2), 34, 35, 37 (a) and 39 of the Convention, and the Optional Protocol on the sale of children, child prostitution and child pornography)

Corporal punishment

24. Recalling its general comment No. 8 (2006) on the right of the child to protection from corporal punishment and other cruel or degrading forms of punishment, the Committee recommends that the State party:

- (a) Enforce the prohibition of corporal punishment in all settings, and monitor the impact of relevant legislation to inform measures aimed at promoting attitudinal change concerning corporal punishment in all settings;
- (b) Develop protocols and guidelines for action when corporal punishment takes place, including mechanisms for safe and confidential reporting, and ensure appropriate responses;
- (c) Strengthen awareness-raising campaigns for parents, teachers and other professionals working with and for children on the prohibition of corporal punishment in all settings and to promote positive, non-violent and participatory forms of child-rearing.

Freedom of the child from all forms of violence

25. The Committee notes with appreciation the measures taken to address violence against children, but is deeply concerned about:

- (a) The prevalence of domestic abuse, sexual exploitation and gender-based violence against children, and the underreporting and insufficient investigation of such cases;
- (b) Insufficient services and inter-institutional coordination among relevant sectors for supporting child victims of violence;
- (c) Insufficient capacities of professionals working with and for children to identify victims and address cases of sexual exploitation and abuse;

(d) The lack of a comprehensive system for collecting and analysing data on violence against children.

26. **The Committee urges the State party:**

(a) **To ensure effective implementation of the amended Protection against Domestic Violence Act and its complementarity with the services regulated under the Social Services Act, especially on provisions on child victims and witnesses and specialized recovery;**

(b) **To strengthen measures aimed at combating and preventing violence against children, including by: (i) ensuring that child protection systems take a trauma-focused and child rights-based approach to preventing and addressing cases of abuse and neglect; and (ii) ensuring effective collaboration among and referrals to the child protection services, law enforcement authorities, health-care services, education and the judicial system;**

(c) **To strengthen the capacities of professionals working with and for children, including social workers and law enforcement authorities, to identify and support children at risk of violence and to prevent, report and respond to cases of violence;**

(d) **To ensure mandatory reporting of violence against children, including by strengthening capacity for a multidisciplinary approach to case management and raising awareness among relevant professionals;**

(e) **To promptly and effectively investigate and intervene in all cases of violence against children, including domestic violence and the sexual abuse and exploitation of children in and outside the home, in the digital environment, and in educational and alternative care settings, and to ensure that perpetrators are brought to justice;**

(f) **To ensure that all children who are victims or witnesses of violence have prompt access to child-sensitive, multisectoral and comprehensive interventions, services and support, including forensic interviews, medical evaluation, counselling and psychosocial support, with the aim of preventing the secondary victimization of those children;**

(g) **To strengthen as a standard procedure the audiovisual recording of the child victim's testimony taken in child-friendly facilities during the investigative stage, followed by cross-examination, if needed, without delay, and to ensure that the audiovisual recording is accepted as the main evidence during the court proceedings;**

(h) **To ensure the systematic and coordinated collection and analysis of data on violence against children by establishing a dedicated national database that includes: (i) the possibility to record more than one type of violence on annual information cards; (ii) data on the implementation of the coordination mechanism's case management system; and (iii) data on cases that have been reported, investigated and prosecuted;**

(i) **To undertake a comprehensive assessment of the extent, causes and nature of violence against children, including domestic and gender-based violence, to inform the implementation of relevant strategies and programmes.**

Harmful practices

27. **The Committee welcomes the amendment of the Family Code to remove exceptions to the age of marriage of 18 years, but remains concerned about the persistence of child marriages and cases where children's marriages were authorized by a judge. Recalling joint general recommendation No. 31 of the Committee on the Elimination of Discrimination against Women/general comment No. 18 of the Committee on the Rights of the Child (2019) on harmful practices, the Committee recommends that the State party:**

(a) **Strengthen measures to prevent child marriages, particularly among Roma girls, and ensure that these effectively address the root causes; and raise public**

awareness, train relevant professional groups, and identify and investigate cases of child marriage;

(b) Ensure that the performance of unnecessary medical or surgical treatment on intersex children is safely deferred until children are able to provide their informed consent, that incidents of unnecessary medical or surgical treatment of intersex children are investigated, and that victims receive redress and psychosocial support;

(c) Train medical and psychological professionals on sexual, biological and physical diversity and on the consequences of unnecessary surgical and other medical interventions for intersex children.

Optional Protocol on the sale of children, child prostitution and child pornography

28. Recalling its previous recommendations,³ the Committee recommends that the State party:

(a) Fully incorporate the provisions of the Optional Protocol into national legislation, including by explicitly criminalizing all forms of the sale and sexual exploitation of children as defined in articles 2 and 3 of the Optional Protocol, distinct from trafficking;

(b) Prevent and address the online sale of children for the purpose of sexual exploitation and abuse, including by training relevant professionals and ensuring that Internet service providers are required by law to promptly block and remove online sexual abuse material and that, in the case of non-compliance, they are sanctioned appropriately;

(c) Address the root causes of the sale of children, including poverty, discrimination and segregation in communities where the practice occurs;

(d) Ensure the early identification of children who are victims of offences under the Optional Protocol and referral to adequate services and support for social reintegration and physical and psychological recovery.

E. Family environment and alternative care (arts. 5, 9–11, 18 (1) and (2), 20, 21, 25 and 27 (4))

Family environment

29. The Committee recommends that the State party:

(a) Provide appropriate assistance and support to caregivers of children whose parents are working abroad for the performance of child-rearing responsibilities and effective protective measures for the children;

(b) Ensure measures to support children effectively in cases of parental conflict, such as mediation and psychosocial support, and ensure that children are heard in judicial measures in such cases.

Children deprived of a family environment

30. The Committee commends the State party for its deinstitutionalization policy but is deeply concerned about insufficient measures to prevent family separation, to monitor the quality of care environments, and to provide specialized support services for children living in and leaving alternative care.

³ CRC/C/BGR/CO/3-5, para. 64. See also CRC/C/OPSC/BGR/CO/1.

31. The Committee urges the State party:

(a) To strengthen the capacity of the child protection system, including by allocating sufficient resources, increasing the number of trained social workers and improving multi-agency coordination and family support services;

(b) To invest in early intervention and preventive services at the central and municipal levels to support families in vulnerable situations and prevent child abandonment and family separation, particularly among Roma children and children with disabilities;

(c) To adopt professional standards for and ensure continuous capacity-building of social service workers to provide family- and community-based care responses for children who cannot stay with their families, and to consistently support children throughout their time in care by means of individual care plans;

(d) To complete the deinstitutionalization process and continue to support and prioritize family-based and community-based care options for children who cannot stay with their families, such as placement within the extended family or in foster care, and to facilitate the reintegration of children into their families and communities whenever possible;

(e) To ensure that poverty, disability or migration status is never the sole justification for family separation; that adequate legal safeguards and clear criteria are applied in determining whether a child should be placed in alternative care; and that children are separated from their family only as a measure of last resort and if it is in their best interests, after a comprehensive assessment of their situation and taking into consideration their views;

(f) To monitor the quality of care, including by verifying whether it adheres to minimum norms and standards; to conduct regular and substantive reviews of placements in care; and to enable the reporting, monitoring, remedying and effective prosecution of maltreatment of children;

(g) To ensure that family-type accommodation centres fully integrate children into the community and do not perpetuate social isolation and segregation;

(h) To strengthen the system of foster care through sustainable funding; to ensure capacity-building of foster carers and in-service support; and to address the negative social perception of foster carers;

(i) To strengthen support for prospective and current adoptive parents and adopted children, and to ensure that children with disabilities and Roma children are not discriminated against in the adoption process;

(j) To strengthen measures aimed at providing education, skills, housing and opportunities for independent living for children leaving alternative care.

F. Children with disabilities (art. 23)

32. Noting with appreciation the measures taken to advance the rights of children with disabilities, the Committee recommends that the State party:

(a) Continue its efforts to adopt a human rights-based approach to disability;

(b) Strengthen early detection and early intervention services, including for children with autism and non-verbal children, and ensure multisectoral coordination for the effective referral of children with disabilities to specialized and accessible health-care services and other relevant support services;

(c) Ensure the right of children with disabilities to grow up in their family environment, including by strengthening support for parents and ensuring that they know how to seek the necessary support;

(d) Facilitate the transition of children with disabilities from institutional to family settings and strengthen the non-institutional protection network;

(e) Strengthen support for the social integration and individual development of children with disabilities, including children with autism and development disorders, by: (i) training all professionals working with and for children on the rights and specific needs of children with disabilities; and (ii) ensuring the access of such children to early childhood development programmes, personal assistance, rehabilitation and reasonable accommodation for their full inclusion in all areas of public life, including education, play and cultural activities;

(f) Conduct awareness-raising campaigns to combat the stigmatization of children with disabilities and to promote a positive image of them as rights holders;

(g) Set up a unified, multi-institutional system for collecting data on the number of children with disabilities, the type of disability and their specific needs to develop effective policies with the aim of ensuring access to the appropriate services.

G. Health (arts. 6, 24 and 33)

Health and health services

33. The Committee welcomes the measures taken to ensure health services for children, including Ordinance No. 26 of 2007 on the provision of obstetric assistance to uninsured women, but is concerned that uninsured pregnant women and children in disadvantaged situations face significant barriers, including prohibitively high costs, to accessing health services. The Committee recommends that the State party:

(a) Ensure the access of all children to quality health services, including by ensuring the availability of health mediators throughout the State party;

(b) Develop a strategy to address health inequalities and the underlying causes in respect of uninsured pregnant women and children in disadvantaged situations, including Roma women and children, children with disabilities, socioeconomically disadvantaged children, migrant children and children in rural areas;

(c) Strengthen measures to ensure the availability of affordable, high-quality prenatal care, and paediatric primary and specialist health-care services, including medicines for home treatment and devices for specific health conditions, for uninsured pregnant women, children in disadvantaged situations and children with chronic, genetic or rare diseases;

(d) Allocate sufficient human, technical and financial resources for the implementation of the National Programme for Improving Maternal and Child Health 2021–2030;

(e) Ensure the equal access of Roma women and their newborns to quality health services;

(f) Strengthen measures to promote exclusive breastfeeding, implement the International Code of Marketing of Breast-milk Substitutes and further raise awareness about the importance of breastfeeding.

Mental health

34. Noting with appreciation the adoption of the National Strategy for the Mental Health of Citizens 2021–2030, the Committee recommends that the State party:

(a) Develop a national mental health programme dedicated to children that is adequately resourced and includes measures: (i) to scale up community-based, child-sensitive, therapeutic and interdisciplinary mental health services; and (ii) to provide screening for mental health issues and early prevention services in schools;

(b) Conduct awareness-raising activities for children, parents and educators on how children can seek support for mental health issues and to remove the stigma associated with such services;

(c) Promote specialist training in child and adolescent psychiatry, and ensure that the number of qualified medical professionals, including child psychologists and psychiatrists, is sufficient to meet the mental health needs of children;

(d) Strengthen measures to address the underlying causes of poor mental health among children, including those that have been exacerbated as a result of the coronavirus disease (COVID-19) pandemic, and invest in preventive measures.

Adolescent health

35. The Committee notes with appreciation the measures taken to improve adolescent health, but is concerned about the high birth and abortion rates among adolescents and their limited access to family planning and sexual and reproductive health education and services. The Committee recommends that the State party:

(a) Develop a policy to address the high birth and abortion rates among adolescents and ensure their access to age-appropriate family planning services, free contraceptives and safe abortion and post-abortion care services, including in Roma communities and for adolescents with disabilities;

(b) Integrate comprehensive, age-appropriate and evidence-based education on sexual and reproductive health into mandatory school curricula and into teacher training and ensure that it includes education on sexual and reproductive health rights, sexual diversity, responsible sexual behaviour and prevention of early pregnancy and sexually transmitted infections;

(c) Provide adolescents with information on preventing substance abuse, and with access to early identification and adequate referral, and strengthen efforts in respect of community-based drug dependence treatment services.

H. Standard of living (arts. 18 (3), 26 and 27 (1)–(3))

Standard of living

36. The Committee notes with appreciation the measures taken to reduce child poverty, but remains concerned about the high rate of child poverty, particularly among Roma children, children in large families and children with disabilities. The Committee recommends that the State party:

(a) Strengthen existing policies and social protection measures to end child poverty and ensure the right of all children to an adequate standard of living, including with regard to access to adequate housing, water and sanitation;

(b) Increase social benefits to reflect the rising cost of living and repeal the amendments to the Family Allowances Act concerning the suspension or termination of family allowances if the child stops attending school or when the child becomes a parent, with a view to ensuring that all such children in need can receive social benefits and family allowances;

(c) Provide adequate resources and support for parenting support programmes at the central and municipal levels;

(d) Ensure that measures to combat poverty comply with a child rights-based approach, address the root causes of multidimensional child poverty and inequality, and include a particular focus on children in disadvantaged situations, especially Roma children, children of single parents, children in large families and children with disabilities;

(e) Address the root causes of homelessness and significantly increase the availability of adequate and long-term social housing for families in need, with a view

to ensuring that all children, particularly Roma children, children with disabilities and children leaving alternative care have access to affordable, quality housing.

I. Children's rights and the environment (arts. 2, 3, 6, 12, 13, 15, 17, 19, 24 and 26–31)

Children's rights and the environment

37. Noting with concern the large number of children living in areas with unsafe levels of air pollution and toxic air and water, the Committee recalls its general comment No. 26 (2023) on children's rights and the environment, with a special focus on climate change, and recommends that the State party:

- (a) Reduce greenhouse gas emissions in line with international commitments, and accelerate the transition to renewable energy;
- (b) Enforce standards on air quality, including through the National Atmospheric Air Quality Monitoring System, and urgently take measures to ensure environmental health for children by: (i) improving the air quality in urban areas; (ii) preventing children's exposure to environmental toxins and high levels of lead; and (iii) ensuring that polluters are monitored and sanctioned;
- (c) Ensure that the European Union nationally determined contributions, the National Strategy for Adaptation to Climate Change and other policies and programmes addressing environmental protection, climate change and disaster risk management are developed and implemented with child rights impact assessments and taking into account the principles of the Convention and the needs and views of children;
- (d) Raise children's awareness of the Intergovernmental Declaration on Children, Youth and Climate Action, and ensure that age-appropriate, safe and accessible mechanisms are in place for children's views to be heard regularly and at all stages of environmental decision-making processes affecting them;
- (e) Promote, with the active participation of schools, children's awareness of and preparedness for climate change and natural disasters and strengthen awareness-raising for children on their right to a clean environment and the enjoyment of the highest attainable standard of health.

J. Education, leisure and cultural activities (arts. 28–31)

Education

38. The Committee welcomes the measures taken to ensure the access of all children to education, but is seriously concerned about:

- (a) High dropout and absenteeism rates;
- (b) The poor quality of education, inequalities in educational attainment and outcomes for children in disadvantaged situations, and segregation of students on ethnic grounds;
- (c) Insufficient support for inclusive education;
- (d) Insufficient access of refugee and asylum-seeking children to education;
- (e) The prevalence of bullying, including cyberbullying, and of violence in schools.

39. **The Committee urges the State party:**

- (a) To strengthen measures to improve the quality of education at all levels of education, including by adapting and revising the content of school curricula, integrating life skills training and modern teaching methods, and strengthening the training of teachers and education professionals;

(b) To address inequalities in educational attainment and educational outcomes, particularly in respect of literacy and numeracy, for children in disadvantaged situations, including Roma children, children with disabilities, asylum-seeking, refugee and migrant children and children in rural areas;

(c) To increase enrolment in and improve access to quality early childhood education, in particular in rural areas and small towns, including by strengthening support for parents and caregivers;

(d) To address the segregation of students on ethnic grounds and disparities in access to education in enrolment, in completion rates and in performance between children from different regions and socioeconomic or ethnic backgrounds, in particular Roma children;

(e) To continue to ensure the access of all children with disabilities to inclusive education, including by:

(i) Establishing mechanisms for monitoring the quality of inclusive education, and ensuring that children with special needs and learning difficulties are recognized as a target group by the National Education Inspectorate, thereby subjecting their inclusive education to quality assurance standards;

(ii) Further adapting curricula and training and assigning specialized teachers and professionals in integrated classes, so that children with disabilities receive individual support and due attention;

(iii) Developing targeted measures to address the high dropout rates among children with disabilities and ensure the right of all non-verbal children and children with special needs to inclusive education in mainstream schools;

(f) To ensure the right of asylum-seeking, refugee and migrant children to education, regardless of their residence status;

(g) To develop programmes aimed at addressing the root causes of school dropout, particularly among children in disadvantaged situations, and ensuring that all children can complete primary and secondary education;

(h) To take targeted measures, including with the participation of children, to eliminate violence in schools, including bullying and cyberbullying, and ensure that such measures encompass prevention, early detection mechanisms, the empowerment of children, mandatory training for teachers, intervention protocols, psychosocial support for victims, consistent and robust recording and monitoring of bullying behaviour, and awareness-raising about the harmful effects of bullying;

(i) To ensure the teaching of children's rights and the principles of the Convention within the mandatory school curricula in all educational settings and in the training of teachers and education professionals;

(j) To develop a national strategy, with sufficient resources, aimed at ensuring that all children, including children with disabilities, children in rural areas, children with disadvantaged socioeconomic backgrounds and asylum-seeking and refugee children, have access to inclusive sporting, recreational, leisure, cultural and artistic activities.

K. Special protection measures (arts. 22, 30, 32, 33, 35, 36, 37 (b)–(d) and 38–40 of the Convention, and the Optional Protocol on the involvement of children in armed conflict)

Asylum-seeking, refugee and migrant children

40. The Committee notes with appreciation the legislative measures taken to ensure the rights of asylum-seeking and refugee children, and the establishment of a coordination mechanism for supporting unaccompanied children. It also commends the State party for

hosting a large number of refugees from Ukraine. However, the Committee is deeply concerned about:

- (a) Reports of violent pushbacks by border officials;
- (b) Lengthy stays by asylum-seeking and refugee children in closed reception centres, with living conditions that are not in line with international standards;
- (c) Insufficient resources for ensuring the access of children to qualified legal aid and integration measures;
- (d) Detention of refugee and unaccompanied children, despite legislation guaranteeing their exemption.

41. Recalling joint general comments No. 3 and No. 4 (2017) of the Committee on the Protection of the Rights of All Migrant Workers and Members of Their Families/No. 22 and No. 23 (2017) of the Committee on the Rights of the Child on the human rights of children in the context of international migration, the Committee recommends that the State party:

- (a) Strengthen the quality of the asylum process to prohibit and prevent the pushback and refoulement of asylum-seeking and refugee children, including unaccompanied children, and to ensure that all such children receive qualified, child-friendly legal support to seek asylum;
- (b) Ensure that the best interests of asylum-seeking children are given primary consideration in all asylum processes, that their views are heard and given due weight and that they have access to child-friendly justice mechanisms and remedies;
- (c) Allocate sufficient resources to ensure that all asylum-seeking, refugee and migrant children have unhindered and speedy access to identification documents and integration measures, including education, health-care services, age- and gender-appropriate care arrangements, psychosocial support and social protection services;
- (d) Ensure that the procedure for determining the age of unaccompanied children is clear, and child- and gender-sensitive, is based on multidisciplinary assessments of the child's maturity and level of development and respects the legal principle of the benefit of the doubt;
- (e) Ensure the availability of interpreters, social workers, cultural mediators and identification and referral mechanisms for unaccompanied children to support services tailored to their needs;
- (f) Continue to ensure that asylum-seeking and refugee children, including unaccompanied children, are exempt from detention, and that they are not deported and/or separated from their parents on the basis of their or their parents' migration status;
- (g) Ensure that all unaccompanied children, including those who are above 14 years of age, are promptly identified, are assigned to a trained case worker and receive protection as children;
- (h) Establish an independent national monitoring mechanism to ensure rights-based border management and entry systems; and prevent, and investigate reports of, the ill-treatment of asylum-seeking and refugee children by law enforcement and border officials, and take administrative and legal actions against those responsible.

Children belonging to minority groups

42. Noting with deep concern the discrimination and social exclusion faced by Roma children, which places them in particularly vulnerable situations, the Committee recommends that the State party:

- (a) Encourage the reporting of ethnically motivated or hate crimes against Roma children, investigate such cases and punish perpetrators with commensurate sanctions, and provide compensation to the victims, as appropriate;

(b) **Strengthen measures to prevent the social exclusion of Roma children and ensure their full and equal access to health care, adequate housing, education and all other services.**

Economic exploitation, including child labour

43. **The Committee recommends that the State party:**

(a) **Improve the monitoring and enforcement of laws and policies on child labour, including in the informal and agricultural sectors;**

(b) **Prosecute perpetrators of violations relating to child labour and impose penalties that are commensurate with the gravity of the crime.**

Trafficking

44. **Noting with appreciation the establishment of the national mechanism for referral and assistance to victims of trafficking in human beings in 2016 and of the crisis centres for child victims of human trafficking, the Committee recommends that the State party:**

(a) **Strengthen measures aimed at ensuring the early identification and referral of child victims of trafficking, including for commercial sexual exploitation and in the context of tourism, to appropriate child-friendly and gender-sensitive services;**

(b) **Ensure that child victims of trafficking have access to the necessary support and services for their care, rehabilitation and reintegration, including shelter, psychological support and legal assistance;**

(c) **Investigate all cases of trafficking in children, using intersectoral and child-sensitive proceedings, and bring the perpetrators to justice.**

Administration of child justice

45. The Committee is deeply concerned about:

(a) The complete lack of progress in implementing its previous recommendations from 2016 and 2008 regarding child justice;

(b) The unacceptably large number of children who continue to be: (i) affected by the Law on Combating the Antisocial Behaviour of Minors and the Underaged; (ii) deprived of their liberty, without appropriate legal representation or the possibility of judicial review; (iii) staying in correctional and educational facilities with inadequate living conditions; and (iv) placed in correctional boarding schools under the Law on Combating the Antisocial Behaviour of Minors and the Underaged.

46. **Recalling its general comment No. 24 (2019) on children's rights in the child justice system, the Committee urges the State party to implement the Committee's previous recommendations⁴ to bring its child justice system fully into line with the Convention and other relevant standards, and in particular:**

(a) **To expedite the reform of the child justice system by adopting the bill on diversion from criminal proceedings and ensuring that it actively promotes non-judicial measures, such as diversion, mediation and psychosocial support, for children alleged as, accused of or recognized as having infringed the penal law and, wherever possible, the use of non-custodial measures for children, such as probation or community service;**

(b) **To urgently take measures to abolish the Law on Combating the Antisocial Behaviour of Minors and the Underaged and to ensure that children under the minimum age of criminal responsibility are not subject to punitive measures, including placement in correctional boarding schools;**

⁴ [CRC/C/BGR/CO/3-5](#), paras. 59 and 61; [CRC/C/BGR/CO/2](#), para. 69.

(c) To ensure the effective provision, at an early stage of the procedure and throughout the legal proceedings, of qualified and independent legal aid to children accused of or recognized as having infringed the criminal law;

(d) To phase out the use of correctional boarding schools and, in the interim period, ensure that children in such facilities have access to protection measures under the Child Protection Act and that their placement is reviewed on a regular basis with a view to its withdrawal;

(e) To ensure that detention is used as a last resort and for the shortest possible period of time, and that detention conditions comply with international standards, including with regard to monitoring and access to education, health-care services and a child-friendly mechanism for complaints.

Optional Protocol on the involvement of children in armed conflict

47. Recalling its previous recommendations,⁵ the Committee recommends that the State party:

(a) Criminalize the recruitment and use of children in hostilities by the armed forces and non-State armed groups;

(b) Establish a mechanism for the early identification of children who may have been recruited or used in armed conflicts abroad upon their entering the State party and provide support for their physical and psychological recovery, rehabilitation and integration into society.

L. Ratification of the Optional Protocol on a communications procedure

48. The Committee recommends that the State party, in order to further strengthen the fulfilment of children's rights, accede to the Optional Protocol on a communications procedure.

M. Ratification of international human rights instruments

49. The Committee recommends that the State party, in order to further strengthen the fulfilment of children's rights, consider ratifying the International Convention for the Protection of All Persons from Enforced Disappearance and the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.

N. Cooperation with regional bodies

50. The Committee recommends that the State party continue to cooperate with the Council of Europe on the implementation of the Convention and other human rights instruments, both in the State party and in other States members of the Council of Europe.

IV. Implementation and reporting

A. Follow-up and dissemination

51. The Committee recommends that the State party take all appropriate measures to ensure that the recommendations contained in the present concluding observations are fully implemented and that a child-friendly version is disseminated to, and made widely accessible for, children, including those in the most disadvantaged situations.

⁵ CRC/C/BGR/CO/3-5, paras. 65 and 66. See also CRC/C/OPAC/BGR/CO/1.

The Committee also recommends that the combined sixth and seventh periodic reports, the written replies to the list of issues and the present concluding observations be made widely available in the languages of the country.

B. Next report

52. The Committee will establish and communicate the due date of the eighth periodic report of the State party in due course, in line with the envisaged predictable reporting calendar based on an eight-year review cycle, and following the adoption of a list of issues and questions prior to reporting, if applicable, for the State party. The report should be in compliance with the Committee's harmonized treaty-specific reporting guidelines⁶ and should not exceed 21,200 words.⁷ In the event that a report exceeding the established word limit is submitted, the State party will be asked to shorten the report. If the State party is not in a position to review and resubmit the report, translation thereof for the purposes of consideration by the Committee cannot be guaranteed.

⁶ [CRC/C/58/Rev.3](#).

⁷ General Assembly resolution 68/268, para. 16.