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Position of Integro Association on the Commission Staff Working Document 2026 Country Report – Bulgaria and the Council Recommendation on the Economic, Social, Employment, Structural and Budgetary Policies of Bulgaria

Integro Association presents this position in relation to the 2026 Bulgaria Country Report (“Commission Staff Working Document 2026 Country Report – Bulgaria”) and the Council Recommendation on the Economic, Social, Employment, Structural and Budgetary Policies of Bulgaria (“Council Recommendation on the economic, social, employment, structural and budgetary policies of Bulgaria”).

The Roma community is explicitly mentioned **significantly more often** in the Bulgaria Country Report than in the Council Recommendation – **53 times in the Staff Working Document compared to only 5 times in the Recommendation**. This quantitative analysis was conducted by **Kamen Makaveev, Lead Researcher at Integro Association**. The difference points to a significant gap between the extent to which Roma are visible in the analysis of the situation in Bulgaria and the extent to which the specific challenges faced by the Roma community are reflected in the policy recommendations.

Concerning the Commission Staff Working Document

The Bulgaria Country Report repeatedly acknowledges and documents the high levels of poverty, social exclusion, educational inequalities and inadequate housing conditions affecting the Roma community. However, **the analysis remains largely descriptive and does not sufficiently address the structural factors that reproduce these inequalities**.

The report lacks a more comprehensive analysis of the role of **antigypsyism, discrimination and prejudice** as barriers to equal access to education, employment, housing and public services. It also does not sufficiently address the impact of **spatial segregation and the concentration of Roma communities in isolated neighbourhoods**, which limit access to quality education, healthcare, infrastructure and economic opportunities.

The report addresses poverty primarily through the lens of income, without sufficiently recognising **its multidimensional nature**. For a significant proportion of Roma families, poverty is a combination of low income, inadequate housing, limited access to services, low educational attainment and limited participation in social and public life. The report also lacks a sufficiently in-depth analysis of **housing insecurity**, including problems related to address registration, lack of security of tenure and the risk of forced evictions.

Insufficient attention is given to **Roma children**, who are among the groups most affected by poverty and social exclusion. Issues related to child poverty, early childhood development and the need for integrated support for families are not addressed in sufficient depth.

The report does not sufficiently recognise the importance of the **participation of Roma communities and Roma civil society organisations** in the design, implementation and monitoring of policies. The experience accumulated by Roma civil society demonstrates that sustainable results can be achieved through the active involvement and empowerment of the communities themselves, rather than solely through measures designed and implemented by public institutions.

Concerning the Council Recommendation

Roma are not explicitly identified as a target group in the recommendations, despite the fact that the Bulgaria Country Report identifies them as the group facing the highest risk of poverty and social exclusion and as a group facing serious challenges in education, employment, healthcare and housing. At the same time, **Recommendation No. 5 addresses most of the policy areas that are of critical importance to Roma inclusion.**

This approach is likely linked to the aim of mainstreaming Roma-related issues within broader policies targeting vulnerable and underrepresented groups. While such an approach seeks to integrate Roma inclusion into mainstream policies, it also creates a risk that **the specific challenges faced by the Roma community remain insufficiently visible and inadequately addressed.**

Roma are not simply one among many vulnerable groups. They continue to be the community most severely affected by the cumulative and mutually reinforcing impact of multiple adverse factors, including poverty, segregation, discrimination, territorial isolation and limited access to quality public services. In the Bulgarian context, the absence of an explicit reference to Roma creates a risk that their specific challenges may fall outside the focus of implementation.

Experience shows that **universal measures often fail to reach communities** that simultaneously face poverty, segregation, discrimination and territorial isolation.

The lack of a clear focus on Roma also weakens the ability to **monitor results**. Institutions may therefore report progress under the implementation of the Recommendation without demonstrating whether the situation of the community most affected by social exclusion has actually improved.

In conclusion, there appears to be a **disconnect between the analysis presented in the Bulgaria Country Report and the formulation of the recommendations**. While the report clearly identifies the Roma community as one of the groups most affected by poverty, exclusion and inequality, the recommendations do not provide a sufficiently clear signal to national authorities that **addressing Roma exclusion should be among the main priorities in their implementation**. This may limit both the effectiveness of the measures undertaken and the ability to assess real progress for one of the most vulnerable communities in Bulgaria.

Concerning the Participation of Roma Civil Society in the Consultation Process

Unfortunately, Integro Association was not contacted by any of the relevant national services or institutions to provide information or expertise during the preparation of the report and the development of its relevant sections. At the same time, our organisation was actively engaged in activities aimed at ensuring its own operational sustainability and, as a result, was not able to engage more actively in this process.

Nevertheless, we would like to note that, overall, the preparation of the report was not accompanied by **sufficient transparency, public outreach or awareness-raising**. In practice, the process of civil society participation appears to have been very limited. We are not aware of the involvement of civil society representatives in the preparation of the report and, even less so, of the participation of representatives of Roma civil society.

Given the important role assigned to civil society and Roma organisations in both the EU Roma Strategic Framework and the Council Recommendation on Roma Equality, Inclusion and Participation, **a more structured, transparent and inclusive consultation process would have contributed both to the quality of the analysis and to the legitimacy of its conclusions and recommendations.**

The position was prepared by **Kamen Makaveev, Lead Researcher at Integro Association.**

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