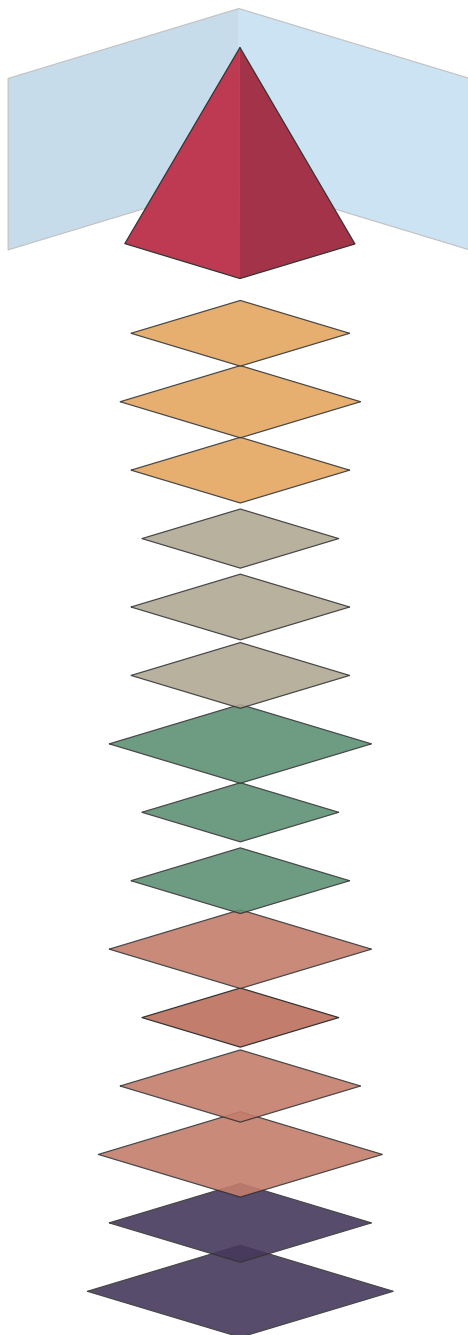




BULGARIA



5.65

CRIMINALITY SCORE

68th of 193 countries

11th of 44 European countries

7th of 17 Central & Eastern European countries



CRIMINAL MARKETS

5.40

HUMAN TRAFFICKING 5.00

HUMAN SMUGGLING 5.50

EXTORTION & PROTECTION RACKETEERING 5.00

ARMS TRAFFICKING 4.50

TRADE IN COUNTERFEIT GOODS 5.00

ILLICIT TRADE IN EXCISABLE GOODS 5.00

FLORA CRIMES 6.00

FAUNA CRIMES 4.50

NON-RENEWABLE RESOURCE CRIMES 5.00

HEROIN TRADE 6.00

COCAINE TRADE 4.50

CANNABIS TRADE 5.50

SYNTHETIC DRUG TRADE 6.50

CYBER-DEPENDENT CRIMES 6.00

FINANCIAL CRIMES 7.00



CRIMINAL ACTORS

5.90

MAFIA-STYLE GROUPS 5.00

CRIMINAL NETWORKS 7.00

STATE-EMBEDDED ACTORS 7.50

FOREIGN ACTORS 5.00

PRIVATE SECTOR ACTORS 5.00

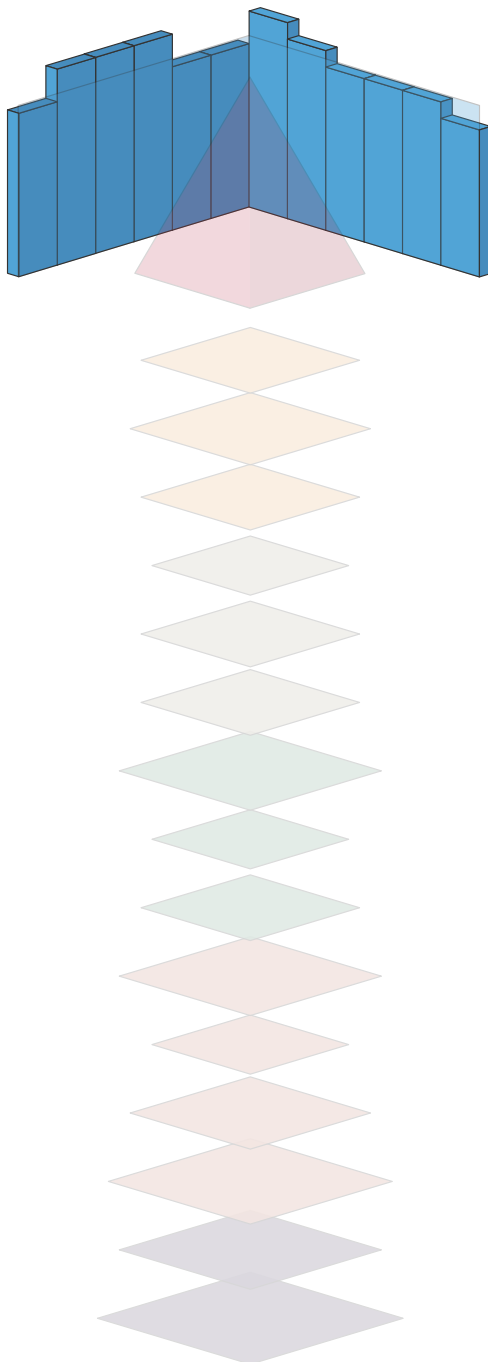


5.33

RESILIENCE SCORE



 **BULGARIA**



 **5.33**
RESILIENCE SCORE

69th of 193 countries
29th of 44 European countries
6th of 17 Central & Eastern European countries

POLITICAL LEADERSHIP AND GOVERNANCE	5.00
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	6.00
INTERNATIONAL COOPERATION	6.00
NATIONAL POLICIES AND LAWS	6.00
JUDICIAL SYSTEM AND DETENTION	5.00
LAW ENFORCEMENT	5.00
TERRITORIAL INTEGRITY	6.00
ANTI-MONEY LAUNDERING	5.50
ECONOMIC REGULATORY CAPACITY	5.00
VICTIM AND WITNESS SUPPORT	5.00
PREVENTION	5.00
NON-STATE ACTORS	4.50

 **5.65**
CRIMINALITY SCORE

 CRIMINAL MARKETS	5.40
 CRIMINAL ACTORS	5.90



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CRIMINALITY

CRIMINAL MARKETS

PEOPLE

Bulgaria remains mostly a country of origin for human trafficking in the EU, with Bulgarian women and children being exploited in the sex trade throughout Western Europe. There are reports of labour exploitation of men and boys, predominantly in agriculture, construction, or the service sector across the region. As there is local demand for victims of human trafficking, primarily in Bulgaria's larger cities and resorts, the country to a lesser extent also serves as a destination country, with Bulgarian, Turkish, and Romani women and girls accounting for most of the sex trafficking victims identified in the country. Despite an influx of refugees to Bulgaria following the war in Ukraine, no reports of Ukrainian women and children falling victim to trafficking have been released yet. The use of violence in this market has diminished now that criminal groups increasingly work with contracts and exert control over their victims in other ways. However, people trafficked into Western and Northern Europe to work as beggars are still punished and suffer a significant degree of cruelty if their daily quotas are not met. Although more effective implementation is needed, the Bulgarian government's crackdown on human trafficking networks in recent years is proving successful in gradually reducing the reach of the market.

Because Bulgaria is located on the Balkan route, it continues to be a hub for human smuggling. In recent years, most of the irregular migrants who have arrived in the country originated in Afghanistan and Syria. In general, Bulgarian-based human smuggling networks provide in-transit logistics for the smuggling of migrants from Turkey to Serbia or Romania. However, some well-organized groups may also be smuggling people all the way to their intended destinations. Most human smuggling groups have a foreign national as an organizer – someone who is based elsewhere and recruits migrants. Corruption is an important factor in human smuggling, with border officials facilitating the market and organizing bespoke smuggling channels. Although not near the height of the migrant crisis of 2015/2016, the migrant pressure on the country's borders has been increasing in recent years with peak arrivals recorded in 2022.

Extortion practices, protection racketeering, and loansharking, which are widespread in the country, are used by organized crime groups to infiltrate legitimate economic activity and to exercise control over legal markets. Smaller criminal networks, larger mafia-style groups, and businesspeople in leadership positions are reported to carry out such illegal activities, mostly targeting disadvantaged people from minority groups and other vulnerable citizens, as

well as small and medium-sized enterprises. Traditional extortion methods in the form of threats, arson, property damage, and even physical violence, are also widespread in the country.

TRADE

Although arms trafficking is not extensive, and there is a limited use of firearms by criminals, Bulgaria remains an important transit country for Turkish-manufactured gas pistols trafficked to Western Europe, where they are converted to be able to fire live ammunition. To a much more limited extent, Bulgaria is a source country for firearms trafficking, mostly into Greece. The grey market generates much of the profit from arms trafficking. It involves intermediaries who, using falsified end-user certificates, sell arms to terrorist organizations and militias. The arms-production sector is prone to corruption because of some cities' economic dependence on arms manufacturing. It is highly likely that low- and mid-level officials at border checkpoints are involved in arms trafficking. It is also assumed that there has been an increase in illicit arms trafficking because of the increase in the legal production and export of arms in the region caused by the war in Ukraine.

Bulgaria is vulnerable to the trade in counterfeit goods facilitated by widespread corruption among border guards, with the Turkish-Bulgarian border being key to this trade. The most-seized counterfeit products include clothing and clothing accessories, perfumes and cosmetics, shoes, toys, bags, wallets, and others mostly originating in Turkey, China, and Hong Kong. The goods are either transported for local distribution or are transiting through Bulgaria on their way to Western European countries such as the Netherlands and the UK. Bulgaria is a source, transit, and destination country for counterfeit pharmaceutical products that pass through the Turkish-Bulgarian border and are subsequently transported to countries in Western Europe. Besides foreign and Bulgarian organized crime groups, the trade in counterfeit pharmaceutical products also involves medical practitioners and professionals working in pharmaceutical companies.

Similarly, the smuggling and illicit trade in tobacco products are pervasive in the country and are transnational in nature. The key entry points for smuggled cigarettes are mostly along the Greek and Turkish borders. Although the trade in illicit cigarettes has been identified as one of the major criminal threats to the safety and security of Bulgaria, the levels of illicit cigarette production reported by law enforcement authorities have been decreasing since 2019. Nonetheless, despite the dismantling of several criminal groups active in this market, Bulgarian criminal networks

continue their cross-border illicit activities because of the connection with their European counterparts.

ENVIRONMENT

Widespread corruption in Bulgaria's forestry sector continues to enable a significant illicit logging market. Even though many cases of illegal logging are linked to people needing wood for fire, organized crime groups in Bulgaria are also involved in the timber industry and export illegal timber abroad with the help of corrupt officials. There are instances of government officials being part of the organized networks that illegally extract timber, and there are allegations of links between major political parties and the so-called wood mafia. Furthermore, private sector actors take part in illicit logging, using corruption or fraud to avoid regulations. The fauna criminal market remains small-scale, even though poaching continues to be an issue in the country. Offences are usually linked to individual poachers, rather than organized crime groups and domestic/international illegal markets. Nonetheless, an illegal caviar trade and sturgeon overexploitation remain a concern for Bulgaria. Bulgarian sturgeon farms are known to launder wild-caught sturgeon and to market the caviar through fraud and counterfeiting with a certain degree of involvement of organized crime groups in this market.

The market for non-renewable resource crimes is significant, including primarily copper, zinc, and coal as well as gold and silver. Moreover, oil trafficking is especially prominent in Bulgaria, with estimates of illegal oil sales accounting for a 20--40% share of the total market. Illegal diesel sales are also a problem.

DRUGS

Bulgaria remains an important transit country in the global heroin trade with most of the heroin passing across the country through Turkey and destined for countries in Western Europe. The heroin route through the Turkish-Bulgarian border has become increasingly important because of the Russia-Ukraine conflict. Local demand accounts for a small portion of the profits. Heroin continues to be the preferred drug of the marginalized, especially the Roma community, who are allegedly involved in trafficking small quantities of heroin from Turkey and distributing it in Bulgaria. However, there has been a decrease in consumption among these high-risk populations. Although primarily Bulgarian groups are involved in the transit of heroin through Bulgaria, recent law enforcement operations suggest the involvement of international organized crime groups consisting of Bulgarian and Serbian members. Bulgaria continues to be primarily a transit country for cocaine, following the changes in the entry point for cocaine in the region. To a lesser extent it is a destination country for cocaine, with a small market existing in larger cities and tourist resorts. Bulgarian-based criminal networks have traditionally played a logistical role in cocaine trafficking, successfully

facilitating large-scale operations from South America to Western Europe. Following the COVID-19 pandemic, the modus operandi of cocaine traffickers has changed, with containers being preferred over drug mules.

Bulgaria remains mainly a destination and transit country for the illegal cannabis market. Bulgarian criminal networks continue to be heavily involved in the logistics of cannabis trafficking from Albania to Turkey, Serbia, and Romania. Cannabis is the most prevalent drug in the country and demand is widespread, which has prompted organized crime groups to expand their presence in the market. Recently, increasing quantities of cannabis grown in Bulgaria have been exported to Turkey and Greece, although to a lesser extent. It is likely that corruption plays an important role in cannabis trafficking, with checkpoints on the North Macedonian, Romanian, and Turkish borders being the most vulnerable. The consumption of synthetic drugs is on the rise in Bulgaria. The market has a transnational nature, with synthetic drugs arriving from the Netherlands and Belgium to be trafficked into Turkey and the Middle East. Precursors necessary to produce synthetics are also transited through or destined for Bulgaria. As amphetamine and methamphetamine are the second- and third-most used drugs in the country, this local demand is satisfied by small producers in the country. Groups from the Sofia region have established themselves as amphetamine producers, while groups in the south-east of the country specialize in methamphetamine production. Police reports show a rise in courier deliveries of synthetic drugs purchased online.

CYBER-DEPENDENT CRIMES

Bulgaria has become a source country for cyber-dependent crimes in recent years, with more than half of cyber-attacks on cloud storage globally originating from IP addresses located in Bulgaria. Organized crime groups active in this criminal market have increasingly been formed by Bulgarian nationals, rather than members of other nationalities. Cyber-dependent crimes in Bulgaria continue to grow in volume and variety. The relatively low levels of awareness of the threats and risks of cyber-attacks among the population have put victimization levels on an upward trend in recent years. State agencies in Bulgaria have been targeted by malicious actors through major cyber-attacks using ransomware and other forms of cyber-attacks, causing disruption of services and damages. Furthermore, private sector actors and media organizations are increasingly targeted by cyber-criminals suffering from ransomware and distributed denial-of-service attacks.

FINANCIAL CRIMES

Financial crimes are pervasive in Bulgaria with the most common forms being misuse of public as well as EU funds, and embezzlement. Embezzlement, misuse of public funds, and corruption allegations have been on the rise in recent years with public officials allegedly abusing their power.

Different from other financial crimes, the misuse of EU funds is mostly carried out by public officials and consultants as well as beneficiaries, with most of the fraud happening in relation to agricultural subsidies. Albeit less prevalent than in the past, tax fraud and tax evasion carried out by groups similar to traditional organized crime groups continue to be one of the major concerns for the Bulgarian economy. Another type of financial crime targeting vulnerable people are so-called phone scams, where predominantly elderly citizens are being targeted by structured organized crime groups. Scammers usually pretend to be police officers or medical personnel to gather personal and financial information. Furthermore, phishing as well as investment scams and mobile transaction scams are on the rise in the country. Compared to the late 1990s and early 2000s, when financial crimes were primarily concentrated in the hands of mafia-style groups, the criminal actors involved in financial crimes today range from high-ranking officials to loose criminal networks and individual criminal entrepreneurs. Organized crime groups engaged in financial crimes in Bulgaria are able to conceal the proceeds of their illicit activities by using legitimate businesses as camouflage. The corruption and infiltration of government institutions by mafia networks makes it difficult for the state to act against these crimes.

CRIMINAL ACTORS

State-embedded actors not only facilitate criminal markets by providing protection, but also hold influence over Bulgaria's legislative and judicial systems. In addition to their involvement in the organized criminal markets in the country, state-embedded actors continue to carry out corrupt activities and misappropriate funds, causing great losses to the treasury. For instance, there are several public procurement contracts awarded to specific companies that do not follow proper protocols, and officials at the highest political levels trade in influence. Moreover, the state-mafia nexus continues to be described as the largest issue for the country.

RESILIENCE

LEADERSHIP AND GOVERNANCE

Bulgaria's political elite has put combating organized crime high on the agenda and can boast with successes in the field. The international community's primary concern remains the widespread corruption in the country. In general, there is political will to tackle all major forms of organized crime, although the response is weak in countering white-collar crime and corruption where political interests persist. Even though the political system is not captured by organized

A number of widespread and opportunistic criminal networks, differing in structure and size, operate in almost all the traditional criminal markets including drug trafficking, human trafficking, human smuggling, cigarette smuggling, and illicit logging. They target Bulgaria's larger cities and resorts but may also be based in smaller municipalities and border regions. These criminal networks are now less violent towards trafficking victims, except for cases of forced begging. Drug markets are relatively unaffected by violence, with force rarely being used. Criminal networks cooperate closely with state-embedded and foreign criminal actors – Albanians, Turks, Latin Americans, and Italians who operate in their own countries. Foreign criminal actors rarely operate within the country itself, with the notable exceptions of Afghani human-smuggling networks, which conduct their business in Bulgaria but are controlled from Afghanistan, and Chinese nationals who are involved in the distribution of counterfeit goods. However, following the invasion of Ukraine, reports have suggested that some organized crime groups have relocated from Ukraine to Bulgaria.

Even though the traditional mafia's influence has declined as most groups have been dissolved, those who remain have set up legitimate businesses and established their influence in the legal economy and in politics. Nonetheless, they are still involved in criminal operations, primarily extortion and drug trafficking. In addition to the more influential syndicates, there are other smaller mafia-style groups operating with a more local and limited influence in the country. After the dissolution of prominent mafia-style groups, established and legitimate private sector actors have continued their illicit activities including extortion, money laundering, and tax avoidance within the legal economy, which is facilitated by widespread corruption among high-level public officials. The connections between the private sector and public officials, as well as the influence of private sector actors over the government and the judicial system, are indicative of the presence of organized crime at all levels of the state infrastructure.

crime, there are several allegations regarding the facilitation of organized crime by the state apparatus. These allegations, combined with widespread corruption, have resulted in a continuing political deadlock triggering political instability in Bulgaria. Corruption continues to be extensive and public trust in institutions is low. There is an anti-corruption body, but it is neither effective nor independent. Transparency has improved significantly, with institutions now publishing annual reports and statistics on their activities, but certain

issues in promoting transparency more extensively across the state administration persist. Major issues also include public accountability, control of the prosecution service, and difficulties accessing public information. Moreover, there are concerns that anti-corruption laws are not enforced adequately, especially in high-profile cases, which have contributed to the culture of impunity.

Bulgaria is party to most international treaties and conventions pertaining to organized crime. The country generally adheres to all relevant mechanisms, but it continues to be criticized for its lack of compliance with the UN Convention against Corruption. Bulgaria is a member of and an active contributor to several regional and global counterterrorism and anti-organized crime initiatives, and there have been a number of successful international operations in the field. However, the country has been criticized for demonstrating a low level of effectiveness in the areas of financial intelligence, and investigations and prosecutions of money laundering. At the national level, the national legal framework covers all major criminal markets. However, there is no national anti-organized crime strategy and policies are typically designed in an ad hoc manner in the form of measures against different types of organized crime, and sentences for certain offences continue to be lax.

CRIMINAL JUSTICE AND SECURITY

Following the issues of independence and corruption pertaining to the Specialized Prosecutor's Office, this body was disbanded in 2022. Despite this, corruption within the judiciary continues to mar effective prosecution. Moreover, problems within the judicial system have persisted, such as a bureaucratic judicial process that has resulted in lengthy trials, and the absence of specialized prosecutors, specifically prosecutors specializing in human trafficking. As for the penitentiary system, it has been criticized for being outdated and ineffective. Overall deficiencies in the penitentiary system do not contribute to the spread of organized crime throughout the system, however they make petty corruption possible and hinder correctional processes. Some progress has been reported in improving conditions of detention centres with the establishment of new detention facilities as well as transitional wards.

There are specialized law enforcement units tasked with countering organized crime, but it is difficult to assess their effectiveness. Even though law enforcement is reported to be well equipped and funded, the lack of political will to tackle certain forms of organized crime may be diminishing their effectiveness. Moreover, corruption within law enforcement and political influence adversely affect law enforcement's effectiveness when investigating and prosecuting certain criminal activities.

Even though Bulgaria's capacity to control and protect its borders has improved over time, its borders continue to

be under constant pressure from illicit flows, as witnessed at the Kapitan Andreevo border crossing, made worse by the hard-to-police terrain and strategically important position of the country on the Balkan route. There is good cooperation between Bulgaria and neighbouring countries in the field of border policing. However, there is a growing foreign influence over the political, media, and social life in the country, especially with the political elite and the security apparatus allegedly being influenced by Russia. There are concerns regarding this foreign influence potentially having a detrimental influence over the resilience capability of the state and its ability to make adequate decisions to protect its integrity and sovereignty. The country's integrity has been challenged by cyber-attacks targeting administrative entities and resulting in disruption of services.

ECONOMIC AND FINANCIAL ENVIRONMENT

Although the Bulgarian government has put emphasis on the development of adequate anti-money laundering (AML) legislation that complies with EU regulations, practical enforcement continues to be weak and the number of investigations, lawsuits, and money laundering sentences, as well as the severity of penalties, continue to be low. Bulgaria shows low efficiency in areas related to the use of financial intelligence, and investigations of and prosecutions for money laundering. The country is nonetheless perceived as being highly resilient to money laundering, mainly because of the good performance of its AML framework.

The overall economic regulatory environment has been slowly improving over the years, largely because of a growing number of electronic services and the electronic exchange of data between institutions. The state's capacity to ensure that legitimate businesses can operate without interference from criminal groups has improved, but there are still entities and state actors who are able to extort and appropriate businesses. The economic environment allows businesses to expand, but there are many bureaucratic processes that business owners must reckon with. Corruption, a lack of political independence, and ineffective administrative processes in other key regulatory bodies contribute to a permissive environment where organized crime is able to proliferate. Even though criminal groups are not directly involved in economic market regulation, they have influence over the authorities responsible for this regulation. Improvements in the economic regulatory capacity have been limited because of the political instability in the country.

CIVIL SOCIETY AND SOCIAL PROTECTION

Victim support provided by state and non-state actors continues to be mainly focused on victims of human trafficking and on drug users. The efforts by the government to ensure victim and witness support have decreased in recent years with too few dedicated shelters and a lack of assistance provided to child victims. Similarly, the legal

framework pertaining to witness support exists, however its effectiveness continues to be problematic.

There are prevention tools actively being used in the country with an aim to prevent organized crime, including information campaigns, which are central to the country's prevention efforts and efforts to assist the victims. With an aim to encourage the public to report abuse, reporting mechanisms were made available to report instances of organized crime. Nevertheless, prevention strategies that cover general and organized crime are not as efficient as foreseen, with a culture of prevention still being developed. Civil society organizations continue to be considered an integral part of the state's efforts to tackle crime. However, some of these organizations, especially those that are critical to the government, are also perceived as hostile by the government. Civil society organizations primarily rely on project-based EU and US funding, as well as individual donations, as state funding is limited or wholly absent. Even though civil society is improving in Bulgaria, the state is not fully committed to promoting its independence. The media sector remains pluralistic, but outlets face increasing pressure to provide government-friendly coverage. Journalists who are critical of the government and their ties to organized crime at times encounter threats or violence, making media freedom in the country unstable and fragile.

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