

**TO:  
DUBRAVKA ŠUICA,  
VICE-PRESIDENT FOR  
DEMOCRACY AND  
DEMOGRAPHY**

**TO:  
VĚRA JOUROVÁ,  
VICE-PRESIDENT FOR  
VALUES AND  
TRANSPARENCY**

**TO:  
ELISA FERREIRA  
COMMISSIONER FOR  
COHESION AND REFORMS**

**TO:  
NICOLAS SCHMIT,  
COMMISSIONER FOR  
JOBS AND SOCIAL RIGHTS**

**TO:  
DIDIER REYNDERS,  
COMMISSIONER FOR  
JUSTICE**

**TO:  
HELENA DALLI,  
COMMISSIONER FOR  
EQUALITY**

**Cc:**

**JOOST KORTE,  
DIRECTOR-GENERAL OF  
DG EMPLOYMENT, SOCIAL  
AFFAIRS AND INCLUSION**

**MARC LEMAÎTRE,  
DIRECTOR-GENERAL OF  
DG REGIONAL AND URBAN  
POLICY**

**TIINA ASTOLA,  
DIRECTOR-GENERAL OF  
DG JUSTICE AND  
CONSUMERS**

**TOMISLAV DONCHEV,  
DEPUTY PRIME MINISTER OF  
REPUBLIC OF BULGARIA**

**15 January 2020**

**LETTER FROM BULGARIAN CIVIL SOCIETY ORGANIZATIONS**

**Re:           ATTACK AGAINST CIVIL SOCIETY ORGANIZATIONS AND PRO-  
EUROPEAN POLICIES**

Dear representatives of the European Union institutions,

In the last few years, Bulgaria has faced challenges regarding the civil society similar to those in some other countries of Central and Eastern Europe: smear campaigns against groups of CSOs, increasing anti-EU propaganda and actions stigmatizing human rights groups<sup>1</sup>. Since early 2018 the smear campaign against CSOs has intensified. This has resulted in: a) the government refusing to support the ratification of the Council of Europe Convention on preventing and combating violence against women and domestic violence; b) freezing the adoption of the National Child Strategy, coupled with the government abandoning any attempt to educate the public on the significance and content of the Strategy; c) denying access to schools for CSOs implementing school-related projects as a result of a letter of the Ministry of Education instructing school principals to stop working with CSOs; c) weakened public trust in CSOs and damage to their reputation.

We address you with the alert that the wave of attacks on civil society peaked yet again in the autumn of 2019, the target being organizations providing social services and organizations receiving support from the Active Citizens Fund of the EEA Financial Mechanism.

The current campaign against social service providers is extremely aggressive. Its objective is to prevent the new Social Services Act passed in early 2019 from entering into force on January 1<sup>st</sup>, 2020. This new progressive law was submitted by the Ministry of Labour and Social Policy after almost 10 years of discussion. The law addresses most of the challenges identified in the course of many years and promotes the deinstitutionalization reforms launched a decade ago. Moreover, the law was passed by the 44<sup>th</sup> National Assembly after a comprehensive public consultation process that lasted for more than 5 years.

The current attacks against the Act feature the following false claims:

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<sup>1</sup>These developments started in the beginning of 2018 with an attack on gender organizations within a campaign against the ratification of the Council of Europe Convention on preventing and combating violence against women and domestic violence (the Istanbul Convention), which later on extended its dimensions to become an attack against child rights organizations involved in helping the government develop a National Child Strategy, a policy document that shall be adopted, as required by the law, every 10 years. Following an [aggressive campaign](#) conducted by informal movements on social media, the Prime Minister withdrew the draft National Strategy.

- CSOs as services providers will allegedly play a destructive role with respect to Bulgarian families due to their financial interest to destabilize families and take away their children in order to receive money for service provision<sup>2</sup>;
- CSOs receive foreign funding and, hence, advocate on behalf of foreign interests;
- The social service area is too important to be contracted to CSOs; the state must not withdraw from its responsibility by delegating service provision to private CSOs;
- The decentralization of service provision will result in the state abandoning its duty to ensure support;
- The Social Services Act will allegedly enable some foreign organizations with a purportedly malevolent agenda to come to Bulgaria and undermine Bulgarian families.

This propaganda has also clear anti-EU features. According to posts in social media CSOs are promoting an EU, anti-Bulgarian agenda. Furthermore, the propaganda specifically targets provisions in the Social Services Act which allow EU-based providers to deliver services in Bulgaria. While the attack started on social media, driven by citizens' "groups" insisting on "national values", it has subsequently been mainstreamed, with many politicians now either buying into their arguments or stating themselves "we must listen to the voice of people". It is a matter of deep concern that foreign-funded and/or service provision CSOs are broadly misrepresented as having a conflict of interest – driven only by their wish to receive state funds for providing services, without being genuinely concerned about the welfare of Bulgarian children and families. In December 2019, 56 leading CSOs signed a letter to the government whereby they demanded that the government should continue the process of enacting the Social Service Act. However, this letter triggered a large-scale campaign against CSOs on social media.

At the end of 2019 the National Assembly voted an amendment for postponing by six months the entering into force of the Social Services Act. This decision was taken without conducting the due regulatory impact assessment justifying the measure, and without prior public consultations, either.

The current discourse is a clear threat to the democratic principles of public consultations and decision-making, putting at risk the pro-European agenda of the Bulgarian government. The debates and the exchange of views would have been a regular process within a genuinely pluralistic democratic setting, had it not been for the malicious attacks and insinuations which, in addition to being far removed from the truth, are also aptly used to manipulate public fears and concerns. We are afraid that the ongoing attack against CSOs is indeed an assault on the role of civil society in promoting the EU values of protecting human rights, the rule of law, equality and diversity.

We believe civil society is a core element of European society, and any attacks against the very existence of CSOs are attacks against the EU. In view of this, we ask you, as representatives of the EU institutions:

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<sup>2</sup> Provision of social services by private organizations, including CSOs, started in 2002 and has been consistently recognised by government institutions as a best practice in the area of public-private partnerships, with over 15% of all social services contracted to CSO providers.

- To make a clear public statement on the importance of civil society;
- To urge the Bulgarian government to protect civic space and stand against hate campaigns questioning the need for civil society organizations;
- To meet with us to discuss our concerns and support us in reaffirming core EU values and principles.

We look forward to your response.

Yours sincerely,

1. **"Animus Association" Foundation**
2. **Access to Information Programme**
3. **Agapedia Bulgaria Foundation**
4. **Association NAIA**
5. **Association "Child and Space"**
6. **Association "Children with Oncohematologic Diseases"**
7. **Association Autism**
8. **Association Civil society initiatives- Lovech**
9. **Association Demetra**
10. **Association for Pedagogical and Social Assistance for Children FICE-Bulgaria**
11. **Association for Shared Learning ELA**
12. **Association of Parks in Bulgaria**
13. **BALKANI Wildlife Society**
14. **BlueLink Foundation**
15. **Bulgarian Association for Alternative Tourism**
16. **Bulgarian Biodiversity Foundation**
17. **Bulgarian Center for Not-For-Profit Law**
18. **Bulgarian Donors' Forum**
19. **Bulgarian Family Planning and Sexual Health Association**
20. **Bulgarian Family Planning Association (BFPA)**
21. **Bulgarian Fund For Women**
22. **Bulgarian Gender Research Foundation**
23. **Bulgarian Helsinki Committee**
24. **Bulgarian Institute for Legal Initiatives (BILI)**
25. **Center Dynamism Association**
26. **Center for Humane Policy**
27. **Community Bridges Association and National Citizens Initiative The System Kill us ALL**
28. **Equilibrium Association**
29. **European Compass Association**
30. **Fine Acts Foundation**
31. **Foundation "Compassion Alzheimer Bulgaria"**
32. **Foundation for social change and inclusion**
33. **Future for the Children Association**
34. **Global Initiative on Psychiatry - Sofia**

- 35. Greenpeace Bulgaria**
- 36. Health and Social Development Foundation**
- 37. Hope and Homes for Children-branch Bulgaria**
- 38. Hope Foundation, Support Center "Future"**
- 39. Initiative for Health Foundation**
- 40. Institute for Community-based Social Services Foundation**
- 41. Institute for Market Economics**
- 42. International Foundation for Y-PEER Development**
- 43. Listen Up Foundation**
- 44. Lumos, Bulgaria**
- 45. Maria's Family Center Association**
- 46. Maria's World Foundation**
- 47. National Network for Children**
- 48. NGO Club Targovishte**
- 49. Open Door Center Foundation**
- 50. P.U.L.S. Foundation**
- 51. Platform Agora Association**
- 52. Protectors Montana Association**
- 53. RE - ACT Association**
- 54. S.E.G.A. Foundation**
- 55. SMILE Burgas Association**
- 56. Social Activities and Practice Institute**
- 57. SOS Children's Villages Bulgaria Association**
- 58. Symbol of Love Foundation - Goce Delchev**
- 59. The Cedar Foundation**
- 60. The Duke of Edinburgh's International Award - Bulgaria Foundation**
- 61. Time Heroes**
- 62. ZONA LOVECH SDR.**

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