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*Subject: Critical Concerns Regarding Bulgaria's Recovery Plan Conditionality and Rule of Law Compliance*

Dear Commissioners,

As President of the Renew Europe Group in the European Parliament, I write to express our profound concerns regarding Bulgaria's compliance with Recovery and Resilience Facility (RRF) conditionality mechanisms. The European Union designed the RRF to fund democratic reform, not facilitate political repression. Yet Bulgaria now seeks a €653 million disbursement while the very milestone intended to guarantee institutional progress—the creation of an Independent Anti-Corruption Commission—has been fundamentally subverted.

The most alarming evidence of this institutional perversion is the imprisonment of Blagomir Kotsev, the democratically elected mayor of Varna, alongside three other opposition officials.

#### **A Democratic Mayor Turned Political Prisoner**

Blagomir Kotsev, widely recognized for his pro-European, anti-Putin stance, has been subjected to exceptionally severe detention conditions: high-security confinement with minimal outdoor access and indefinite restrictions justified solely by claims that his liberty might "disturb the investigation." Case files have been systematically withheld, due process obstructed, and judicial oversight circumvented. The same institutional abuses are being inflicted upon three additional opposition leaders: one deputy mayor and two city council members.

This represents not an anti-corruption success story, but precisely its antithesis. A milestone designed to guarantee institutional independence is being weaponized to neutralize democratically elected opposition through politicized enforcement—a direct assault on the democratic values that underpin our European project.

#### **Varna: A Critical European Security Asset**

Varna transcends its role as a Bulgarian municipality. It functions as NATO's Black Sea strategic hub, the EU's eastern maritime gateway, and a primary target of Russian influence operations. The systematic undermining of democratic governance in Kotsev's administration destabilizes institutional integrity in a city where Moscow would derive maximum strategic benefit from political chaos. An EU-funded "anti-corruption" commission that facilitates the removal of Varna's democratically elected leadership represents not merely a domestic governance failure, but a direct threat to European security architecture.

#### **Systematic Betrayal of RRF Milestones**

Under the Recovery and Resilience Plan: "Creation of an Independent Anti-Corruption Commission" explicitly mandated:

- Genuine political and financial independence
- Transparent, merit-based appointment processes
- Investigative powers with robust legal safeguards
- Mandatory cooperation with the European Public Prosecutor's Office (EPPO)
- External oversight by the Group of States against Corruption (GRECO)
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Instead, Bulgaria has systematically delivered:

- An anti-corruption apparatus that functions as a political weapon, systematically collecting compromising material for selective targeting of opponents.
- Deliberate obstruction of EPPO investigations through delayed searches, withheld banking records, and concealed procurement evidence.
- Security services and prosecutorial institutions subordinated to private networks controlled by Magnitsky-sanctioned oligarch Delyan Peevski, rather than democratic accountability.
- Legislative amendments that systematically weaken legal safeguards, enabling indefinite pre-trial detention and creating pathways for sustained political imprisonment.

Compounding these institutional failures, Bulgaria's Chief Prosecutor continues serving beyond his constitutional mandate in direct violation of RRP requirements limiting acting appointments. This fundamental breach undermines institutional predictability, accelerates politicization, and blocks reform at the apex of the prosecutorial hierarchy.

#### **The European Parliament's Responsibility**

As representatives of 450 million European citizens, the European Parliament cannot remain silent while EU funds potentially finance democratic backsliding. The RRF operates as a performance-based instrument: institutional reforms must precede financial disbursements. Authorizing payments under current conditions would transmit a devastating message to capitals across Europe, signalling that the EU accepts cosmetic compliance while tolerating systematic abuse of democratic governance.

Our Renew Europe Group has consistently championed the defence of rule of law as fundamental to European integration. We cannot permit EU conditionality mechanisms to become hollow instruments that reward authoritarian drift.

#### **Urgent Parliamentary Recommendations**

To preserve the integrity of EU conditionality and protect fundamental European security interests, the Renew Europe Group urges the Commission to:

1. **Conduct an immediate formal review** of the cases involving Blagomir Kotsev and the three additional detained opposition officials, Nikolay Stefanov, Jordan Kateliev, Nikola Barbutov as an integral component of milestone compliance assessment. Their treatment serves as the clearest indicator of whether Bulgaria's anti-corruption commission operates with genuine independence or functions as an instrument of political persecution.
2. **Suspend the second RRF disbursement** pending completion of this review and implementation of necessary remedial measures by Bulgarian authorities, should the assessment confirm systematic misuse of anti-corruption mechanisms and fundamental rule of law failures. **Establish enhanced monitoring protocols** to ensure genuine
3. compliance with democratic governance standards before any future disbursements.

### Conclusion

Commissioners, the fundamental question confronting European institutions is not whether Bulgaria receives EU funding, but under what democratic conditions such support is provided. To authorize disbursement now would constitute EU financing of political repression in a strategically vital city, embolden Moscow's destabilization efforts, and irreparably damage the credibility of our conditionality mechanisms.

The European Parliament, through the Renew Europe Group, stands ready to support all necessary measures to ensure that EU funds serve their intended purpose: strengthening democratic institutions, not systematically dismantling them.

The only responsible course of action is immediate suspension of disbursement until Bulgaria's anti-corruption reform is restored to its foundational democratic purpose.

Respectfully,



Valérie Hayer  
President of the Renew Europe Group