
**ASSESSING MUNICIPAL
VULNERABILITIES TO
CORRUPTION IN BULGARIA,
SECOND EDITION:
AN EXAMINATION OF FIVE
BULGARIAN MUNICIPALITIES**



Assessing Municipal Vulnerabilities to Corruption in Bulgaria, Second Edition: An Examination of Five Bulgarian Municipalities

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EXECUTIVE SUMMARY

This report, *Assessing Municipal Vulnerabilities to Corruption in Bulgaria: Second Edition*, presents the findings of the International Republican Institute's (IRI) assessment of five Bulgarian municipalities – Dobrich–City, Gabrovo, Haskovo, Plovdiv, and Vidin. This assessment was conducted between June and September 2023 as part of IRI's current program in Bulgaria, which seeks to build recognition by government and non-government leaders of vulnerabilities to corruption that exist in their municipalities, and then equip those stakeholders to address vulnerabilities through reform measures.

Rather than evaluating actual levels of corruption, this report presents an analysis of some of the most pressing vulnerabilities to corruption that can be gleaned from the views and experiences of local stakeholders: political leaders, administrators, council members, journalists, representatives of civil society organizations (CSOs), and engaged citizens. By documenting these vulnerabilities and their potential solutions in a structured and accessible manner, the report can serve as a resource to each community, including contributing to the development of municipal anti-corruption plans and strategies.

Although the municipal VCA assessment was designed to analyze the specific vulnerabilities experienced by each municipality, IRI identified four cross-cutting vulnerabilities to corruption:

1. EFFECTIVE TRANSPARENCY IS HAMPERED BY FORMALISTIC, ONE-SIDED COMMUNICATION

IRI identified that all 5 municipalities covered in this VCA process are committed to transparency and generally publish the information and data that are legally required to be made accessible to citizens. However, such transparency efforts are not always comprehensive, and are more likely to be guided by the strict letter of the law than by its spirit. As a result, these efforts often do not address what citizens may need to truly hold their municipal governments accountable.

2. MINIMAL ACTION ON INTEGRITY ISSUES CONTRASTS WITH CITIZENS' HEIGHTENED CONCERNS ABOUT CORRUPTION

All municipalities covered by this VCA process comply with asset declaration and conflict of interest legal requirements, and there are various mechanisms (hotlines, websites, ad hoc council

committees) for citizens to report corruption. However, these mechanisms were not used often, if at all, and in some cases, interviewees did not know they existed. Municipal officials do not always consider anti-corruption a priority, ostensibly because they consider corruption to be very unlikely. Yet, the views and experiences of local stakeholders captured in the report included concerns about corruption in many different forms.

3. CITIZENS OPT OUT OF PARTICIPATORY OPPORTUNITIES DUE TO THEIR LACK OF MEANINGFUL IMPACT

The municipalities covered by this VCA have established multiple avenues for citizens to voice concerns, raise proposals, and respond to municipal priorities and plans. Despite improvements in public participation mechanisms, interviewees from across all municipalities, and from both local government and civil society backgrounds, shared a pessimistic assessment of civic engagement. From the interviews, it appears that citizens are not entirely demobilized – they have simply lost trust in the municipality's formal participatory channels, which they do not regard as particularly relevant, engaging, or impactful.

4. CIVIL SOCIETY IS OFTEN NEGLECTED OR CROWDED OUT OF MUNICIPAL INITIATIVES

Municipalities regularly work with a subset of local groups and CSOs, whether by contracting out delegated social services to them, assisting them with small grants, providing them with free use of municipal premises, or partnering in cultural, social and economic initiatives. IRI's assessment found, however, too few examples of structured, inclusive, action-oriented platforms through which municipalities and CSOs work together. Municipal administration and council engagement with civil society is inconsistent, selective, and plagued by suspicions of favoritism, clientelism, and partisanship.

These four cross-cutting vulnerabilities threaten the integrity of local democracy in Bulgaria. However, each of the assessed municipalities also hold the potential to address these vulnerabilities and provide a more responsive and transparent government for their citizens. IRI stands ready to partner with municipalities in that effort.

INTRODUCTION

REPORT GOALS AND STRUCTURE

The following report presents the findings of a Vulnerabilities to Corruption Approach (VCA) assessment of five Bulgarian municipalities carried out by the International Republican Institute (IRI) between June and September 2023.

This report is not an evaluation of the actual level of corruption in these municipalities or in the country at large. It presents an analysis of some of the most pressing vulnerabilities to corruption that can be gleaned from the views and experiences of local stakeholders: political leaders, administrators, council members, journalists, representatives of civil society organizations (CSOs), and engaged citizens. By documenting these vulnerabilities – and their potential solutions – in a structured and accessible manner, the report is a valuable input into conversations about corruption that are taking place in each community and will contribute to the development of municipal anti-corruption plans and strategies.

This introductory chapter describes the program and VCA methodology, provides an overview of the main political economy factors to consider when identifying vulnerabilities to corruption and their remedies at the national and municipal levels in Bulgaria, and presents a summary of key findings from the five municipal studies. Subsequent chapters delve into each of the municipalities in greater detail, presenting findings in the form of problem statements broken down into strengths, weaknesses, and recommendations.

IRI'S VCA PROGRAM IN BULGARIA

The International Republican Institute (IRI) is a non-profit, non-partisan organization headquartered in Washington, D.C. IRI works with civil society and governmental partners throughout the world to strengthen democratic practices and empower democratic leaders, including by strengthening accountability systems that limit opportunities for corruption.

Bulgaria has made considerable democratic and economic progress since its transition from a totalitarian communist regime in 1990. The pace of reform accelerated in the run-up to the country's accession to the European Union (EU) in 2007, but has slowed since then. Perceptions of corruption are among the highest in Europe, and there are

lingering concerns about collusion between political and economic elites to advance private interests.

IRI has historically been active in Bulgaria, with programming beginning in the early 1990s. IRI's work included strengthening political parties, increasing youth and women participation in the political process, and conducting public opinion research. IRI's programming ended in 2005, but following an increased recognition of problems of corruption, IRI re-launched programming in Bulgaria in 2021, this time with a focus on countering municipal level corruption.

IRI's current program seeks to provide a detailed understanding of where specific vulnerabilities to corruption lie. It also aims to build consensus among government and non-government leaders on recognizing those vulnerabilities. The program pairs these VCA reports with public opinion polling to better demonstrate citizen demand for transparency and integrity to local elected leaders in an effort to build political will. In addition, IRI supports municipal working groups, comprised of both government and non-government leaders, to address the VCA findings through the development of reform agendas. Finally, IRI supports municipalities and CSOs as they implement reform agendas by providing technical assistance to municipal administrations and by linking CSOs to funding sources.

Since the program's launch in 2021, IRI has supported working groups in 10 municipalities to develop reform agendas, nine of which have been adopted by respective municipal councils and are currently in various stages of implementation.¹ In 2023, IRI expanded the program to a second cohort of five municipalities analyzed in this report: Dobrich-City, Gabrovo, Haskovo, Plovdiv, and Vidin.

THE VCA METHODOLOGY

With support from the National Endowment for Democracy, IRI has created a Vulnerabilities to Corruption Approach to assist local governments in identifying risks to corrupt practices as a way to improve transparency and accountability at the municipal level.

The first step is to establish the existence of political will and tentatively determine the focus of the VCA. IRI does this through a qualitative analysis that accounts for how power and resources are distributed and how those in power view or perceive the current political system – its

¹ The first iteration covered the municipalities of Blagoevgrad, Burgas, Kardzhali, Pernik, Razgrad, Ruse, Sofia, Stara Zagora, Veliko Tarnovo, Vratsa.

constraints, challenges, and opportunities. IRI then carries out semi-structured interviews with government officials and other stakeholders, such as civil society and community leaders, and prepares an assessment report including findings and recommendations. Through the VCA assessment, IRI identifies corruption-related risks and gaps in government processes and supports government responses to these issues. The VCA then bolsters anti-corruption efforts by partnering with local stakeholders through a working group comprised of representatives of both government and civil society.

IRI carried out VCA assessments in the second cohort of five municipalities named above as part of its second iteration of the VCA project in Bulgaria. The selection of assessment locales reflected the diversity of Bulgarian municipalities in terms of population size, political preference, economic make-up, geographical location, ethnic composition, and previously documented risks of corruption. The set of municipalities under study encompasses large cities and small towns, primarily urban and primarily rural districts,

communities dependent on agriculture, industry, and services, and areas with above average concentrations of ethnic minorities.

The first stage of IRI's VCA in Bulgaria consisted of a political economy analysis to pre-emptively identify reform trajectories, windows of opportunity, and potential bottlenecks for reform. This analysis included country-level and municipal-level factors.²

The second stage of the VCA assessment consisted of semi-structured interviews with key informants in each of the five municipalities. A total of 63 people were interviewed, of whom 35 were women. Interviewees were selected to represent a cross-section of public life in the municipality, and they included deputy mayors, senior administration officials, members of municipal councils, and members of civil society comprising CSO representatives, business association representatives, journalists, academics, activists, informal groups, and engaged citizens.³ The distribution by category and municipality is presented in the *table 1 on page 4*.



Figure 1: Map of Selected Municipalities

2 IRI utilized the same political economy analysis it conducted August–October 2021 for both iterations of its VCA assessment. A narrative summary of this analysis is included in the following section.

3 In some instances, interviewees had both a CSO background and served as council members. Those interviewees are counted in these VCA reports as council members.

Municipality	Municipal Government			Civil Society			Total
	1.1 Deputy Mayor	1.2 Admin.	1.3 Council	2.1 CSO	2.2 Media	2.3 Business	
Dobrich–City	1	2*	3	3	1	1	11
Gabrovo		3*	4	5		2	14
Haskovo		3*	3	4	1		11
Plovdiv		3*	3	4	2	1	13
Vidin	1	2*	4	5	1	1	14
Total	2	13	17	21	5	5	63

*Including the secretary of the municipality.

Table 1: Distribution by Category and Municipality

The interviews were conducted remotely via Zoom by a mixed local, international, and U.S.-based team of IRI staff between June 6 and September 21, 2023. Fifty-two interviews were conducted in Bulgarian, with support from a local interpreter for non-Bulgarian team members, and 11 in English.⁴

Prior to each interview, potential interviewees were introduced to the program and methodology. The interview protocol used for this assessment was based on similar VCA assessments conducted by IRI in other countries and adapted from the protocol used during the assessment's first iteration. An introduction clarified what kind of information was sought, the origin of the IRI team, the purpose of the evaluation, and the benefits that the final report would provide the municipality. All interviewees were offered anonymity, and their views were synthesized in such a way that no input would be traceable back to any one of them. The questionnaire focused on three cross-cutting themes – transparency, integrity, participation – with prompts and probing questions tailored to the different categories of interviewee.⁵

POLITICAL ECONOMY ANALYSIS

1. CORRUPTION PREVENTION AT THE NATIONAL LEVEL

Bulgaria is a democratic society and EU member state; as such, it formally adheres to the rules and institutions associated with open access orders. However, governance experts consider it a political system in which coalitions and interest groups compete to use power over legislation and regulation for the extraction of rents (payments, favors, political support, etc.).⁶ This is reflected in global corruption surveys, where Bulgaria is regularly rated as the most corrupt country in Europe. The 2022 Transparency International (TI) Corruption Perceptions Index scores it 43/100, ranking the country in the 79th position worldwide.⁷ The World Bank's Worldwide Governance Indicators scored "Control of Corruption"⁸ for the country in the 50.48 percentile rank.⁹

The country's current corruption problems are rooted partly in its post-communist trajectory. Bulgaria underwent significant economic, political, and social upheaval during the 1990s. A rushed liberalization and privatization process

4 In general, the team was able to easily translate concepts and terms from English to Bulgarian and vice versa. One commonly used Bulgarian term, however, that is difficult to translate into American English is the word "сигнал", which directly translates to "signal." In Bulgaria, this refers to alerts, complaints, and other minor reports that citizens submit to government entities and other institutions (there are cognates in everyday language of other European countries, e.g., "incidencia" in Spanish). The IRI team used the direct translation throughout the VCA process and in several instances in this report. However, to account for the difference in connotation and use of the word in English and Bulgarian, IRI translated the word in this report as "alert" or "report" when necessary for clarity.

5 It is worth noting that responses from interviewees were subjective interpretations or recollections of past experiences, and therefore subject to many different biases. This was mitigated by triangulating between different informants and checking factual statements against publicly available information.

6 Alexander Stoyanov, Ruslan Stefanov, and Boryana Velcheva, 2014, "Bulgarian Anti-Corruption Reforms: A Lost Decade?", ERCAS Working Paper 42 (<https://www.againstcorruption.eu/publications/bulgarian-anti-corruption-reforms-lost-decade/>).

7 Transparency International, 2023, "Corruption Perceptions Index 2022" (<https://www.transparency.org/en/cpi/2022/index/bgr>); The Corruption Perceptions Index ranks countries around the world based on how corrupt their public sectors are perceived to be. The results are given on a scale of 0 to 100, where 0 is highly corrupt and 100 is very clean.

8 The Control of Corruption indicator captures perceptions of the extent to which public power is exercised for private gain, including both petty and grand forms of corruption, as well as "capture" of the state by elites and private interests. Percentile ranks indicate the percentage of countries worldwide that score below each country.

9 World Bank, 2022, "Worldwide Governance Indicators" (<http://info.worldbank.org/governance/wgi/Home/Reports>).

in which elites captured valuable state resources left a residue of anti-Western, anti-neoliberal resentment. However, the EU accession process accelerated the pace of democratization and anti-corruption reform, including the adoption of a Cooperation and Verification Mechanism which was lifted in September 2023 and replaced by the EU-wide Rule of Law Mechanism. It acted as a sort of conditionality tool for ensuring that the country complied with European standards.¹⁰ Following Bulgaria's accession to the EU in 2007, momentum for reform gradually dissipated, with statistics showing not just a slowing but even some regression to past practices.¹¹ Successive governments arrived in office with strong anti-corruption agendas, only to be challenged with allegations of misconduct. National corruption scandals have attracted media attention over the past few years and culminated in a wave of protests in 2020. In 2021–2023, corruption was a central issue throughout an unprecedented series of five general elections over a period of two years.

According to TI's Global Corruption Barometer of the European Union 2021, 90 percent of Bulgarian respondents think corruption in government is a big problem (the EU average is 62 percent). They believe bribery rates are the second highest in the EU and the use of sex as a bribe is the highest, while only 17 percent think the government takes citizens' views into account (the EU average is 30 percent). Sixty-eight percent think the government is controlled by private interests (the second highest in the EU); and 65 percent fear retaliation for denouncing corruption (as compared to 45 percent on average).¹² In IRI's own polling of its first cohort of ten program municipalities conducted in February 2022, the percentage of respondents who reported corruption in their country as a very or somewhat serious problem ranged from 81 to 100 percent.¹³ In IRI's poll of the second cohort of five municipalities assessed in this report, conducted in September–

October 2023, this percentage ranged from 37 to 95 percent.¹⁴ Despite this variation range, the perception of corruption as a national problem has been largely accepted as a social norm, with bribes often perceived as a "form of communication" between private citizens and public officials. As local experts have argued, "The prevailing belief is that bribes will do when one needs to obtain a permit, to influence the courts, to solve problems with police, or to receive funds through a support program."¹⁵

Corruption and related crimes are regulated by the Bulgarian Criminal Code and the Unified Catalogue of Corruption Offences. However, the legislation lacks clarity on some of these offenses, it suffers from worrying gaps around clientelism, nepotism, and the corrupt circumvention of public procurement, and it explicitly forbids anonymity for whistleblowers.¹⁶ In 2018, the Act on Counteracting Corruption and on the Forfeiture of Illegally Acquired Property established a Commission for Counteracting Corruption and Illegal Assets Forfeiture. It calls on elected and appointed public officials to submit annual income and asset declarations and it lists the types of material and immaterial benefits and personal relationships that amount to conflict of interest. In addition, in January 2023, Parliament adopted a Whistleblower Protection Act, which is just entering into force and is yet to be implemented at the municipal level. Reform of the 2018 Act, which has been on the political agenda as part of Bulgaria's commitments under the EU Recovery and Resilience Mechanism, occurred in September 2023. The amendments adopted by Parliament split the Committee for Anti-corruption and Forfeiture of Illegally Acquired Property into two separate committees dealing with high level corruption and illegally acquired property, respectively. Concerns have been raised about the possibility for politicization of the new committee dealing with high level corruption as it

10 Ruslan Stefanov and Stefan Karaboev, 2016, "Improving governance in Bulgaria: Evaluating the Impact of EU Conditionality through Policy and Financial Assistance," Center for the Study of Democracy (<https://www.againstcorruption.eu/publications/improving-governance-in-bulgaria-evaluating-the-impact-of-eu-conditionality-through-policy-and-financial-assistance/>).

11 Lyubomir Todorakov, 2010, "A Diagnosis of Corruption in Bulgaria," ERCAS Working Paper 3 (<https://www.againstcorruption.eu/wp-content/uploads/2012/09/WP-3-Diagnosis-of-Corruption-in-Bulgaria-new.pdf>).

12 Transparency International, 2022, "Global Corruption Barometer: European Union" (<https://www.transparency.org/en/gcb/eu/european-union-2021>).

13 International Republican Institute, 2022, "Public Opinion Survey: Residents of Bulgaria" <https://www.iri.org/resources/public-opinion-survey-of-residents-of-bulgaria/>

14 Publication forthcoming.

15 Alexander Stoyanov, Ruslan Stefanov, and Boryana Velcheva, 2014, "Bulgarian Anti-Corruption Reforms: A Lost Decade?", ERCAS Working Paper 42 (<https://www.againstcorruption.eu/publications/bulgarian-anti-corruption-reforms-lost-decade/>); Diana Traikova et al., 2017, "Corruption perceptions and entrepreneurial intentions in a transitional context – The case of rural Bulgaria," Journal of Development Entrepreneurship 22 (3) (<https://www.econstor.eu/handle/10419/176546>).

16 European Commission, "2020 Rule of Law Report: Country Chapter on the rule of law situation in Bulgaria" (https://ec.europa.eu/info/sites/default/files/bg_rol_country_chapter.pdf).

consists of only three members that are appointed by a two-thirds parliamentary majority. Despite these recent reforms, the legislation's efficacy remains to be seen and, therefore, questionable. In determining conflicts of interest, it still has a very restrictive definition of "related persons" that does not include friends and associates. It also focuses on the exercise of power for private benefit, excluding considerations of indirect gain.¹⁷ Despite the reforms and a relatively high degree of public interest, the number of convictions for conflict of interest and corruption continue to be negligible. Instead, there is a pattern of suspended prison sentences, acquittals, unexplained delays, and lack of official reporting on the progress of cases.¹⁸

Bulgarian civil society, with considerable support from the U.S. and other international donors, has been at the forefront of the fight against corruption. However, there is a limit to what it can do. Despite constitutional protections for freedom of expression and freedom of the press, journalists sometimes face threats or pressure from media owners and there are also concerns about the opacity of media funding.¹⁹ CSOs are not considered an important partner of the public administration, and so they often receive no government response to advocacy and lobbying. TI characterized the level of representation of citizen interests in Bulgaria as "alarmingly low" in a 2016 study.²⁰ The government's neglect of CSOs is partly enabled by very low levels of civic education – citizens are not used to having a say in policy- and decision-making, and often do not know how to channel their feedback. Civil society groups often face open hostility from politicians, and there have been repeated attempts to delegitimize popular protests against corruption as paid for, and organized by, opposition forces or by economic and foreign interests that would profit from destabilizing the country.

2. CORRUPTION PREVENTION AT THE MUNICIPAL LEVEL

The international and national communities' prioritization of anticorruption efforts at the national level left a gap in assistance at the municipal level, despite the direct impact of municipal government corruption on citizens' daily lives. This led to IRI's focus on combatting vulnerabilities to corruption at the municipal level, where it disrupts the delivery of government services and contributes to growing mistrust in public institutions.

Bulgaria is divided into 265 municipalities: regions comprising multiple towns, villages, and settlements, governed by a mayor elected by popular majority and a council elected via proportional representation. Mayors and municipal councilors are elected for four-year terms. The mayor appoints the secretary of the municipality (the chief public administration official) as well as lower-level mayors who oversee smaller settlements or districts within the municipality. However, Bulgaria's relative political and administrative decentralization have not been matched with the corresponding level of fiscal decentralization, and municipalities depend on national government transfers and EU funds for most of their expenditures.

The municipal council and mayor have an almost unchecked influence over municipal affairs, so long as they operate within legal parameters. They have authority over their own salaries, budgets, municipal enterprises, contract awards, integrity inspections, and oversight. Party leaders tend to concentrate political power, and local business interests can have significant sway over policy issues such as zoning, public works, and air quality.

According to the latest EU Global Corruption Barometer, 43 percent of Bulgarians consider all local government representatives corrupt (this perception is lower than for national politicians, but higher than for any other institution).²¹ IRI's 2022 municipal poll, conducted in its first cohort of 10 municipalities, revealed that the percentage of respondents who reported corruption in their municipality as a very or somewhat serious

17 Anti-Corruption Fund, 2019, "Anticorruption Institutions: Trends and Practice" (<https://acf.bg/en/antikoruptionsionni-institutsii-tendents/>).

18 Anti-Corruption Fund, 2021, "Anti-Corruption Institutions: Escalating Problems" (https://acf.bg/wp-content/uploads/2021/07/ACF_ENG_Online_Jul15.pdf).

19 Freedom House, 2022, "Freedom in the World 2021: Bulgaria" (<https://freedomhouse.org/country/bulgaria/freedom-world/2021>).

20 Transparency International Bulgaria, 2016, "Local Integrity System in Bulgaria: Catalogue of Good Practices" (https://transparency.bg/wp-content/uploads/2016/07/2016_Local_Integrity_system_in_Bulgaria_Catalogue_of_good_practices_EN.pdf).

21 Transparency International, 2022, "Global Corruption Barometer: European Union" (<https://www.transparency.org/en/gcb/eu/european-union-2021>).

problem ranged from 50 to 100 percent.²² The 2023 poll of the second cohort of five municipalities found this percentage to range from 45 to 86 percent.²³ The incentives for corruption among municipal officials include the opportunity for enrichment through capture of funding streams (EU funds in particular), extraction of rents or bribes through the sale of municipal property, and cronyism and nepotism in public procurement, hiring, or granting of fees and permits.²⁴ The widespread belief that bribes are an effective way of securing opportunities for private businesses also creates a supply-side incentive for corruption.²⁵

Insufficient attention has been paid to transparency, integrity, and accountability at the municipal level. Integrity systems at the municipal level are derived from the national law but are not tailored to local needs, which renders them ineffective. For instance, conflict of interest requirements at the municipal level do not prevent conflict of interest when municipal councils approve their budgets. Although councils and municipal administrations have set up standing committees to receive alerts and complaints about conflicts of interest and corruption, these bodies only have the power of referral, and they are not frequently used due to their limited ability for objectivity.

The Anti-Corruption Fund (ACF), a Bulgarian CSO, tracks prosecutions and conflict of interest investigations of high-level political corruption. Its 2021 report documented 16 cases against mayors, of which 13 ended in acquittal and only three in conviction. In its 2022 report, published in May 2023, ACF identified three new cases against mayors, which were in the pre-trial stage. Of all cases against mayors tracked by the ACF, only one case ended in actual imprisonment.²⁶

The limited impact of formal anti-corruption mechanisms makes government transparency and citizen participation even more important as

checks on potential vulnerabilities to corruption at the municipal level, as checks on potential vulnerabilities to corruption. However, the Bulgarian transparency model is exclusively top-down. Most information released by municipalities is too complex or requires specialized expertise to interpret it.²⁷ Municipal administrations tend to be under-resourced and subject to high staff turnover with limited capacity to ensure transparent and responsive public management. On the civil society side, most municipal CSONGOs are either local interest associations (sports clubs, retiree groups, etc.) or implementers of delegated social services²⁸ (childcare, services for victims of domestic violence, special needs education, etc.) for the municipality. Civic-focused CSOs are almost non-existent outside of the capital. Independent local media are equally hard to find. With most outlets relying on municipal contracts for their subsistence, it is up to independent journalists or national media correspondents to hold the municipal governments accountable.

CROSS-CUTTING FINDINGS

IRI's municipal VCA assessment in Bulgaria was designed to analyze the specific vulnerabilities experienced by each municipality to support locally owned reform agendas. However, over the course of the assessment certain issues kept reappearing in key informant interviews, and it became apparent that, although each municipality had a unique context, most of them faced broadly similar challenges. IRI's previous Bulgaria VCA assessment report of 10 municipalities highlighted five cross-cutting vulnerabilities to corruption. Four of those are still largely borne out by the evidence gathered in this second cohort of five municipalities. These are presented here in updated formulations and with an emphasis on the challenges faced by the five municipalities. In addition to the five cross-cutting vulnerabilities to corruption outlined in this section, more detailed and tailored problem statements

22 International Republican Institute, "Public Opinion Survey: Residents of Bulgaria" <https://www.iri.org/resources/public-opinion-survey-of-residents-of-bulgaria/>.

23 Publication forthcoming.

24 Alexander Stoyanov, Ruslan Stefanov and Boryana Velcheva, 2014, "Bulgarian Anti-Corruption Reforms: A Lost Decade?", ERCAS Working Paper 42 (<https://www.againstcorruption.eu/publications/bulgarian-anti-corruption-reforms-lost-decade/>).

25 Diana Traikova et al., 2017, "Corruption perceptions and entrepreneurial intentions in a transitional context – The case of rural Bulgaria," *Journal of Development Entrepreneurship* 22 (3) (<https://www.econstor.eu/handle/10419/176546>).

26 Anti-Corruption Fund, 2023, "Anti-Corruption Institutions 2022: Eyes wide shut" (https://acf.bg/wp-content/uploads/2023/06/ACF_Report2023_EN_web.pdf).

27 OECD, 2021, "Decentralisation and Regionalisation in Bulgaria: Towards Balanced Regional Development" (https://www.oecd-ilibrary.org/urban-rural-and-regional-development/decentralisation-and-regionalisation-in-bulgaria_b5ab8109-en).

28 Delegated services are services that the national government tasks municipalities with implementing on its behalf. They are funded through earmarked financial transfers that make up a substantial share of municipal budgets. It is common for municipalities to contract non-profit organizations to implement delegated services.

and recommendations can be found in the chapters covering each municipality.

1. EFFECTIVE TRANSPARENCY IS HAMPERED BY FORMALISTIC, ONE-SIDED COMMUNICATION

IRI identified that all 5 municipalities covered in this VCA process are committed to transparency and generally comply with legal requirements in terms of what information they must make accessible to citizens. In some cases, like public procurement, national digital portals ensure that actions are carried out openly; in other cases, mayors have gone beyond minimum requirements, pushing their teams to communicate more and carry out their everyday duties in a more transparent manner. Municipal councils are generally open as well, with sessions often livestreamed and decisions published for citizens to examine.

However, such transparency efforts are not always comprehensive, and are more likely to be guided by the strict letter of the law than by its spirit. As a result, these efforts do not address what citizens may actually need to truly hold their municipal governments accountable. For example, it may be the case that municipal properties are listed in a publicly available table, but without geodata, status, or current usage information attached to it. Or there is transparency on competitive tenders, but less so on contracts that fall under the legally required threshold for open competition, for which no public information is generally provided by municipalities. Citizens can see who wins a contract and what the technical specifications are, but they rarely have any follow-up information on timelines, quality control, alterations to original budget allocations, and what happens in cases of poor or non-performance. When citizens seek additional information, their formal requests are likely to take time, with official responses focusing on administrative rules and requirements, rather than on matters of substance. Overall, municipal officials appear reluctant to share information with the public, and whatever communication capacity exists is often focused on one-sided public relations activities.

Vulnerability. Incomplete, inaccessible, and poorly organized or explained public information is a vulnerability to corruption because it creates an appearance of openness without giving citizens a chance to hold their municipal governments accountable. Perceptions of lack of responsiveness and selectivity in how information is presented feed concerns about corruption, further eroding trust in government and discouraging citizen

participation. An opaque system of governance is ripe for capture by malicious interests.

Recommendation. IRI recommends that municipalities organize their public information practices to focus on accessibility by analyzing citizens' information needs, offering explanatory materials on technical matters and documents, and updating websites with an eye toward user friendliness. Officials should be trained in communication techniques and communicate with citizens more openly about how decisions are made and whether they lead to their intended results.

2. MINIMAL ACTION ON INTEGRITY ISSUES CONTRASTS WITH CITIZENS' HEIGHTENED CONCERNS ABOUT CORRUPTION

All municipalities covered by this VCA process comply with asset declaration and conflict of interest laws, and there are various mechanisms (hotlines, websites, ad hoc council committees) for citizens to report corruption. Some have reduced the chances of bribery by shifting toward e-services; others have digital tracking systems that record the choices that officials make; across all of them, audits and the introduction of modern management practices are reducing the scope for discretion and impunity.

However, these mechanisms were not used often, if at all, and in some cases, interviewees did not know they existed. Municipal officials do not always consider anti-corruption a priority, ostensibly because they consider corruption to be very unlikely. And this stands in marked contrast with how often the VCA team heard concerns about corruption in many different forms, including: recruitment for key technical roles being made based on familial or political connections, with the ensuing impact on service provision; companies opting out of tenders for which they knew they would not be "selected," sometimes fearing retribution; municipal purchase orders including inflated prices for goods and services; and officials approaching private businesses to arrange for the award of public contracts in exchange for kickbacks. Sometimes these claims are based on rumor, suspicion, or negative public sentiment; but other times they were based on direct personal experience. In every case, concerns about corruption were accompanied by bafflement, frustration, disappointment, and even fear. It is the intensity of these emotions, and their presence across all five municipalities, that makes the lack of municipal attention all the more surprising.

Vulnerability. It could very well be that perceptions of corruption are unfounded, sentiments driven by national scandals and transposed to the municipal level. Or it could be that citizens confuse slow and inefficient government for corruption. Still, the lack of knowledge about and/or non-use of corruption prevention mechanisms is a key vulnerability because it can lead to gaps in awareness, trust, and even enforcement. Without a strong deterrent, corrupt actors are much more likely to seek illicit means to advance their interests. Above all, in a context of information integrity challenges and low trust in government, citizens should be able to discern whether their leaders govern with integrity or whether they just excel at not getting caught.

Recommendation. IRI recommends that municipalities boost capacity-building and communication efforts to educate both citizens and public officials about anti-corruption rules and mechanisms to report, investigate, and sanction corrupt behavior. This should include more thorough reporting on existing corruption prevention measures such as asset declaration, conflict of interest rules, and codes of conduct. Municipal leaders should take corruption as seriously as do the citizens whom they serve.

3. CITIZENS OPT OUT OF PARTICIPATORY OPPORTUNITIES DUE TO THEIR LACK OF MEANINGFUL IMPACT

The municipalities covered by this VCA have established multiple avenues for citizens to voice concerns, raise proposals, and respond to municipal priorities and plans. Plenary sessions of municipal councils are generally open to citizen participation, as are committees in some cases. The municipalities also consult citizens on major issues like budgets and municipal investment plans, and occasionally on smaller-scale decisions that attract public attention. All municipalities covered by the VCA assessment express a desire to engage citizens more effectively.

Despite improvements in public participation mechanisms, interviewees from across all municipalities, from both local government and civil society backgrounds, shared a pessimistic assessment of civic engagement. Municipal officials are generally disheartened by low citizen engagement with public discussions, which are primarily attended by councilors and municipal employees. Sometimes they resent a certain passivity that they observed in the average citizen, whom they see as uninterested, uninformed, and unnecessarily critical. This interpretation, however, cannot easily be reconciled with the fact that many citizens are engaging in other

ways, such as by maintaining active Facebook groups with thousands of members, establishing civic associations, and joining protests or even starting their own political movements. From the interviews, it appears that citizens are not entirely demobilized – they have simply lost trust in the participatory avenues that municipalities make available to them, which they do not regard as particularly relevant, engaging, or impactful.

Vulnerability. The current state of public participation at the municipal level hinders the development and adoption of policies that respond to citizen needs and weakens citizens' ability to hold leaders accountable. When citizens are more likely to protest or withdraw than participate, politicians may feel less compelled to explain the rationales for their decisions to avoid potential backlash. This creates a vicious circle of distrust and demobilization, and eventually an accountability gap that is a key vulnerability to corruption, as it creates a vacuum in democratic governance which corrupt interests could seek to fill.

Recommendation. IRI recommends that municipalities develop rules regulating public consultation so that the process, roles, responsibilities, and expected outcomes are clear to citizens and public servants alike. IRI also recommends that municipalities consider using open-source digital tools for citizen participation. There are valuable models of both in other Bulgarian municipalities.

4. CIVIL SOCIETY IS OFTEN NEGLECTED OR CROWDED OUT OF MUNICIPAL INITIATIVES

Municipalities regularly work with some subset of local groups and CSOs, whether by contracting out delegated social services to them, assisting them with small grants, providing them with free use of municipal premises, or partnering in cultural, social and economic initiatives. These relationships have varying degrees of sustainability and significance. In some cases, there is particularly good collaboration, whether that means jointly addressing problems in an ad hoc manner, or co-developing sector strategies through ongoing, long-term interaction.

IRI's assessment found, however, too few examples of structured, inclusive, action-oriented platforms through which municipalities and CSOs work together. Municipal administration and council engagement with civil society is inconsistent, selective, and plagued by suspicions of favoritism, clientelism, and partisanship. There is a perceived divide between CSOs that are in favor and those

that are out, and in some cases such divides lead to radically different views of municipal leaders' accessibility and transparency. Whenever civil society does engage with local government, it is rarely to contribute to municipal strategies or supplement the administration's technical needs; instead, CSOs are either financially dependent on the municipal budget, invited to contribute to small projects, or asked to help with addressing a localized crisis. More worryingly, in their zeal to provide for their citizens, some municipalities have encroached on sectors or areas of activity that would otherwise be undertaken by CSOs themselves. An unfortunate side effect of this tendency is the gradual weakening of the civic space, as local groups and associations are starved of funding and increasingly seen by citizens as irrelevant.

Vulnerability. Much of the weakness of municipal civil society is related to civic disengagement and distrust of institutions. But municipalities have also failed to nurture and promote civic participation, and in a few instances, they have actively alienated emerging civil society groups. This does not make sense from a public governance perspective since there is much that overstretched and under-resourced municipalities can gain from working with external experts. This estrangement also undermines citizens' ability to monitor and question leaders' decisions, which is a vulnerability to corruption.

Recommendation. IRI recommends that municipalities invest in strengthening the civic space by engaging in more regular, open, and constructive policy discussions with civil society. Though not all municipalities may have locally based civic organizations, there have been plenty of examples of ad hoc citizen mobilization and collaboration with municipal leaders. This can be more productively channeled via organized civic forums, such as public councils, sector-specific working groups, and regular policy engagement by relevant deputy mayors and councilors with community organizations and active citizens.

RECOMMENDATIONS FOR POLICYMAKERS

Bulgaria has made considerable advances in the fight against corruption. However, much of the progress and attention (both national and international) has focused on the national rather than municipal level. Despite Bulgaria's limited decentralization, considerable funds still flow through local government, from national transfers, EU programs, and municipal taxes and fees. This creates opportunities to bring decisions closer

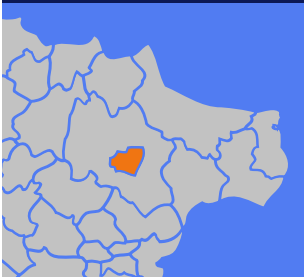
to citizens through effective and transparent municipal leadership. It also allows for exploitation by corrupt actors who operate away from the national spotlight. IRI's VCA highlights some of those vulnerabilities and empowers partners to act in response.

Three overall policy implications can be drawn from the findings presented in this VCA report:

1. **The focus of Bulgarian anti-corruption activity, both governmental and non-governmental, should expand beyond Sofia and other large cities.** Central government agencies and CSOs should pay increased attention to the needs of citizens and public officials at the local level. Only then will gains made at the national level translate into tangible improvements in the lives of citizens.
2. **The national legislative framework should be supplemented with local integrity systems to fully protect municipalities against corruption.** National laws, as currently implemented, are insufficient in preventing and tackling corrupt activities. More attention should be paid to using local ordinances, plans, and strategies to build on existing laws, which will strengthen transparency, accountability, and corruption prevention mechanisms.
3. **The substantial variations across Bulgarian municipalities demand tailored responses to corruption vulnerabilities.** The VCA process revealed considerable differences in institutional capacity and CSO engagement that cannot be met with a one-size-fits-all approach. Instead, reformers should pursue locally sensitive approaches that fit the specific needs of each municipality. Much could be learned from exchanging lessons and best practices across municipalities within Bulgaria, as well as regionally and globally.



DOBRICH-CITY



MUNICIPAL PROFILE

Mayor (former, current) ²⁹	Yordan Yordanov, re-elected
Geographic composition	It includes the city of Dobrich, which is over 109 square kilometers.
Population ³⁰	71,947
Primary economic sectors	Agriculture is the pillar of the region's economy. Dobrich-City is home to a large grain production industry and hosts annual agricultural fairs.

FINDINGS AND RECOMMENDATIONS

Growing transparency still needs to contend with the risk of formalistic and one-sided communication

PROBLEM STATEMENT

Dobrich-City municipality has taken significant steps to be transparent over the years. However, there remains some difficulty in being open about the rationale and processes behind key decisions, especially when they may be interpreted negatively by some citizens. Transparency and accountability efforts are sometimes questioned because of the lack of interaction with media and

citizens, which leaves many unsure about how the administration works.

FINDINGS: KEY STRENGTH

1. Administration and council have a clear commitment to transparency. Dobrich-City municipality has seen increased transparency over the years. The municipal administration publishes relevant information on the municipal website and other channels like Facebook. Council sessions are open and well publicized, and contact details for councilors are available to citizens. In general, both the administration and council strive to share information with the public in a consistent and timely manner and are committed to continued improvement.

²⁹ Local elections were held in Bulgaria on October 29, 2023 and run-offs on November 5, 2023. As IRI's assessment took place during the time of the former mayormandate, both the former and current mayors are listed.

³⁰ Population numbers in this publication are based on the data from 31 December 2022 by the National Statistical Institute, which can be accessed here: <https://www.nsi.bg/bg/content/2975/%D0%BD%D0%B0%D1%81%D0%B5%D0%BB%D0%B5%D0%BD%D0%B8%D0%B5-%D0%BF%D0%BE-%D0%BE%D0%B1%D0%BB%D0%B0%D1%81%D1%82%D0%B8-%D0%BE%D0%B1%D1%89%D0%B8%D0%BD%D0%B8-%D0%BC%D0%B5%D1%81%D1%82%D0%BE%D0%B6%D0%B8%D0%B2%D0%B5%D0%B5%D0%BD%D0%B5-%D0%B8-%D0%BF%D0%BE%D0%BB>

FINDINGS: KEY VULNERABILITIES

1. **Publicly available information still appears to be incomplete at times.** Despite publishing required procurement information on the national online platform, Dobrich-City municipality does not provide the kind of follow-up information that would enable proper accountability. For example, information on updates to budget ceilings of approved projects is not shared on the website, even when they represent significant changes to original plans with implications for the municipal budget. In general, there is limited information on the performance of public contracts.
2. **There is not enough constructive communication with media and citizens.** Communication with local media outlets has a tendency to be one-sided and passive, focusing on providing press releases and responses to written questions instead of creating opportunities for interrogation and criticism. Citizens' queries through the Access to Information Act get addressed, but there is no public record of past responses. Official communications tend to follow formalistic and bureaucratic language. As a result, citizens remain unsure about decision-making processes. Unfortunately, past good practices in terms of public communication, such as Facebook Q&As with citizens and media presence at the weekly coordination meetings of the administration, have been discontinued.

RECOMMENDATIONS

1. **Create opportunities for more direct interaction with citizens and media.** The municipality should take some extra steps to explain decisions and processes to the public. It could hold Q&A sessions with the media to ensure local outlets can better inform citizens, shape their expectations, and dispel their concerns. These sessions could be media-only or open to all citizens, in person or online. Regardless of the format for engagement, it should be supported by communications products that do not just release information, but also contextualize it, explaining and communicating why certain goals are worthwhile, or why certain procedures were followed.

2. **Adopt a transparency policy or strategy that addresses some of the current gaps.** A municipality so committed to enhancing transparency should have an explicit strategy that lets both public officials and citizens know what information will be made available, when, to whom, and over what channels. This should particularly apply to procurement procedures and decisions with budgetary implications, which are so salient for citizens. The strategy itself should be publicly available, explained to all public officials, and reviewed periodically to accommodate new technologies and evolving citizen expectations.

Municipal integrity efforts are not clearly communicated nor understood by citizens

PROBLEM STATEMENT

Corruption is widely regarded by municipal officials as virtually impossible, due to the presence of strong integrity mechanisms and increasing digitalization of services. Ironically, this has led to insufficient public visibility and emphasis on prevention mechanisms, which citizens either do not understand or do not trust due to broader concerns and perceptions of corruption in Bulgaria more generally. When integrity is not a focus of municipal communication, officials, and citizens can lose track of prevention tools and be more ready to believe that corruption is not absent, but merely hidden from sight. This is a recipe for civic distrust of municipal institutions.

FINDINGS: KEY STRENGTH

1. **Strong integrity mechanisms make the risk of corruption appear to be negligible.** Dobrich-City municipality has seen no corruption cases in recent years, partly due to the presence of strong preventive mechanisms. There is compliance within the administration and council with national legal requirements. Systems for posting signals are available and perceived to be efficient. The growing use of e-government and online systems minimizes personal interactions between citizens and officials, and it also allows for traceability of decisions.

FINDINGS: KEY VULNERABILITIES

1. **The municipality does not communicate what it does to prevent corruption.** Perhaps because officials dismiss the possibility of corruption taking place, there has not been an emphasis on carrying out explicit outreach initiatives or messaging campaigns regarding corruption prevention.
2. **There appear to be persistent suspicions of unfairness and conflict of interest.** Despite the lack of clear legal instances of corruption, there are still perceptions (whether founded or unfounded) that procurement procedures are not fair, and that some critical public contract award may mask unreported conflicts of interest. This is coupled with concerns about the process for reporting corruption and the strength of integrity mechanisms.

RECOMMENDATIONS

1. **Carry out awareness raising campaigns on corruption and prevention.** The municipality should raise awareness of the relevance and use of integrity mechanisms, ensuring they are clearly presented and explained. While this will not dispel suspicions from those citizens who will always make accusations of corruption, a well-articulated integrity campaign can be a helpful reminder to public officials of the standards that they should hold themselves to, as well as a useful corrective against unfounded claims and rumors.

Civic engagement approaches are not proactive or systematic enough

PROBLEM STATEMENT

Citizens of Dobrich-City municipality have low interest in participation opportunities due to a prevailing sense that engagement does not have a tangible impact on municipal decisions. This is partly because formal mechanisms for consultation are not explained and used to their fullest potential. But it is also partly because when active citizens come together around CSOs, they encounter a municipality that they perceive as uninterested and unlikely to take feedback into consideration. As a result, citizens do not trust that anything depends on them and are more likely to disengage from municipal governance.

FINDINGS: KEY STRENGTH

1. **The municipality has a track record of supporting citizen and CSO initiatives.** Dobrich-City municipality holds periodic consultations, engages with CSOs on key sectors, and has implemented a successful program for funding small citizen initiatives and CSO projects. The administration has expressed an explicit commitment to engage citizens better and is open to experimentation with new formulas.

FINDINGS: KEY VULNERABILITIES

1. **Public discussions are not organized to maximize citizen impact.** Dobrich – city municipality holds public discussions; however, these can sometimes feel to citizens like formalistic exercises rather than meaningful opportunities for civic participation. There is limited information shared with media before the discussions take place, which makes planning attendance unnecessarily difficult for citizens. The few citizens who attend do not get information or tangible proof of how their input influences decisions.
2. **Municipal engagement with CSOs is inconsistent.** Despite partnerships and productive exchange in some sectors, the municipality's overall engagement with CSOs is ad hoc, with formal and informal civic groups seeing the municipality as unresponsive or uninterested. The absence of systematic structures for policy discussion and planning also contributes to a fractured and uncoordinated civic landscape in which aspirations for joint action are not realized.

RECOMMENDATIONS

- 1. Enhance communication about civic engagement.** The municipality should make civic participation core to their communication efforts, whether through its own products and channels, through community intermediaries, or the media. This should be based on clear internal rules governing what information about public discussions and other consultation formats and processes is mandatory to send to local media and within what timeframe. There should also be clearer communication not only about upcoming participation opportunities, but also about the impact of citizen engagement on decisions taken. The municipality should strive to consult with citizens earlier in the decision-making process to ensure substantive citizen feedback can be incorporated into the decision-making process. To accomplish this, the municipality should consider adopting an ordinance for structuring and enhancing the consultation processes at the municipal level by providing clear rules that will create predictability for the citizens that build trust in the consultation process over time.
- 2. Establish forums and structures to engage with local CSOs on a regular basis.** The municipality should more easily tap into the technical expertise and local experiences of CSOs and active citizens by creating forums and standing structures (consultative council, committees, working groups) that ensure predictability, sustainability, and enable cooperation. This could take the form of a regular public council where citizens can ask questions and submit proposals for discussion, and which would provide continuity between ad hoc consultations. There could also be sector-specific forums or structures convened regularly by the relevant deputy mayors to ensure that the municipality and civil society align their objectives and projects, and to enable the evolution of a more collaborative open process of finding solutions to municipal issues.



GABROVO

MUNICIPAL PROFILE

Mayor (former, current)	Tanya Hristova, re-elected
Geographic composition	It includes the town of Gabrovo and 134 villages over 556 square kilometers
Population	50,578
Primary economic sectors	It is a regional center and has the strongest industrial base in Bulgaria. Manufacturing has deep roots here and accounts for over 60 percent of production in Gabrovo; trade and construction come second and third.
Other	The city has a rich history and heritage and is known as a center of humor and satire. In recent years, the municipality has invested in energy efficiency and green technologies, earning the European Green Leaf Award in 2021.

FINDINGS AND RECOMMENDATIONS

Deficits in effective transparency make it hard for citizens to understand decisions and dismiss rumors of corruption

PROBLEM STATEMENT

The municipality of Gabrovo is ahead of many others in Bulgaria when it comes to transparency, complying with legal requirements and making conscious attempts to reach out to citizens with accessible information. Despite this, citizens worry that official transparency efforts amount to little more than public relations and believe that the

municipality is selective about what it shares and is likely to hide anything that goes wrong. This perceived fixation with cultivating a good image is illustrated by the speed with which the municipality addresses problems posted on Facebook, relative to those raised over formal channels. The lack of comprehensive information about key decisions (in procurement, hiring, services) has led to perceptions of favoritism and corruption, which are particularly prominent with respect to public procurement, quality of contract implementation, and the exploitation of loopholes in regulations and procedures. Absent corrective measures – in the form of more effective transparency – this problem can further undermine citizen trust in municipal officials.

FINDINGS: KEY STRENGTHS

1. **The municipality strives to keep citizens informed.** Gabrovo officials use multiple kinds of media to publicize key processes, decisions, and events. This kind of transparency is practiced online, through the municipal website; in local media, with announcements published in local press and a weekly radio show focused on municipal issues; and in person, at the municipal premises. Citizens are provided with various means for getting in touch with elected leaders and public servants. In the administration, there are open days for the mayor as well as for key officials in various departments; there is also an open desk where citizens can ask for information and get in touch with the municipality.
2. **There are administrative processes in place to ensure impartiality.** The municipality of Gabrovo has adopted e-government systems for accessing services, which limit opportunities for bribes during face-to-face interaction between citizens and officials. Public procurement follows all requirements of transparency and competitiveness. There is an ethics code for public officials in the administration. And signals submitted by citizens via phone, e-mail, or in person are assigned a tracking number and relayed to the relevant departments.

FINDINGS: KEY VULNERABILITIES

1. **Municipal communication is largely a one-way process.** Though the municipality publishes a lot of information and is open to queries for information, it is less efficient at responding to such requests and making additional information available on demand. According to interviewees, formal letters are the main mechanism for making queries, yet they are often met with legalistic responses that may take a long time to materialize and omit critical information.
2. **There are suspicions of corruption in key municipal decisions.** Some citizens of Gabrovo worry about what they perceive to be opaque and potentially corrupt decision-making, particularly as it relates to municipal contracts and positions in the administration going to bidders and candidates affiliated with municipal leaders. The concerns that surfaced during interviews include inflated prices in municipal purchases of goods and for procurement contracts, tender requirements tailored to specific companies, and even

companies opting out of bidding for fear of negative consequences. Interviewees reported that the same set of companies are awarded contracts, even if they failed to complete previous municipal contracts on-time and to correct specification. Despite the municipality's ostensible transparency, there are persisting suspicions that some decisions are taken behind the scenes, without proper explanation.

3. **There are no mechanisms for citizen and municipal council monitoring of public procurement procedures and contract implementation.** Part of the reason why suspicions of corruption persist is the lack of citizen monitoring of public procurement. Citizens receive no explanation why many contracts go to companies from outside of Gabrovo, for example, why budgets are set at certain levels, or what factors lead to project budget changes once implementation has begun. The Gabrovo municipal council does not monitor the execution of public procurement procedures, and there is no public mechanism for monitoring payments made under large contracts and the quality of the contractor's work. This is particularly troublesome given the broadening scope of services provided by the municipality.

RECOMMENDATIONS

1. **Adopt a transparency strategy.** The administration should develop clear guidelines on what information is to be made available, when, and through what means. This should include consideration of better ways for documenting small tenders that fall under the competition threshold, project budget corrections after the start of implementation, and significant aspects of quality and performance. All public officials should be familiar with these guidelines, which should also be made public to shape citizen expectations about transparency.
2. **Increase public and direct interaction with citizens.** Municipal officials in Gabrovo should create more opportunities for citizens to ask questions and openly discuss mistakes and difficulties. Interactive formats should be prioritized – municipal council open days, town halls, press conferences, online Q&As, etc. Municipal officials should be trained in communication and understand that the community is part of the solution.

3. **Establish structures for citizen project monitoring.** The municipality should create structures for citizen monitoring of critical aspects of municipal activity, e.g. on debt, public procurement, and quality of service provision. Such monitoring bodies should bring together councilors, senior officials, and citizens, and can provide valuable insight into the implementation of key projects through open sessions and periodic reports.
4. **Expand and update anti-corruption mechanisms.** Given persistent concerns about corruption in the municipality, officials should make integrity reform and communication an immediate priority. The existing integrity mechanisms should be updated under the umbrella of a municipal anti-corruption strategy supported by compulsory training for public officials. Making this strategy public and reporting on progress against it will go a long way towards dispelling suspicions of corruption.

Existing participatory channels do not foster civic engagement and fail to enable meaningful accountability

PROBLEM STATEMENT

Gabrovo municipality has diligently met legal requirements for citizen participation, and even gone beyond those in organizing public discussions on salient issues. Despite this and the civic sector's potential to propose, consult, and implement, CSOs and citizens largely stay away from these participatory initiatives, chiefly due to the perceived lack of impact. There is a sense among some CSOs and citizens that they are not welcome to be part of municipal initiatives or projects; they feel that they are treated purely as recipients or beneficiaries of municipal decisions and services, without a say. This sentiment is compounded by the municipality's ambition to perform well and deliver to the citizens in as many sectors as possible, taking over initiatives and services that could otherwise be performed by CSOs. As a result, the civic sector in Gabrovo is weaker than it could be. The combination of civic disengagement and CSO displacement severely undermines citizens' ability to hold their leaders accountable in the municipality.

FINDINGS: KEY STRENGTHS

1. **The municipality has created multiple opportunities for participation.** Gabrovo municipality consults citizens on key issues, through public discussions on salient topics and roundtables on smaller issues. The council is also available for citizens to participate, with both plenary and committee sessions open for citizens to attend and raise questions.
2. **The municipality works with civil society on innovative projects.** Over the years, the administration has partnered with community organizations and businesses on such initiatives as an innovation camp and regional innovation center, or a budget for citizen initiatives. There is a municipal advisory group on social issues. And the mayor insists on active collaboration with CSOs on many key issues.

FINDINGS: KEY VULNERABILITIES

1. **Participatory mechanisms are not well attended nor impactful.** Sometimes, public discussions are held on short notice, at inconvenient times, or they do not provide enough information to motivate citizens to attend. There are concerns that some decisions are taken even before discussions are held, and that participation seldom leads to tangible impact. That would explain why Gabrovo citizens and CSOs have stopped attending consultations and are now more likely to engage via Facebook groups than participate in formal channels.
2. **The municipality does not foster local civic partnerships.** Over the years, Gabrovo municipality has decided to assume the provision of most services and implementation of most initiatives, instead of partnering with local CSOs as is common in other municipalities. At a more strategic level, interaction between municipal leaders and civil society on policy issues is minimal: the council does not play a role in meeting civil society or businesses, and the administration has assumed a formalistic approach to joint initiatives and partnerships. The municipality also fails to explain why some proposals from civil society are taken up, while others are dropped or replicated by organizations from outside Gabrovo.

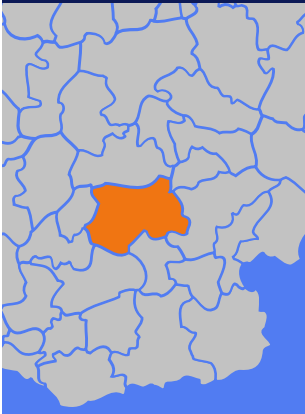
RECOMMENDATIONS

- 1. Adopt a stronger policy on public consultations.** Gabrovo municipality should regulate consultations for greater effectiveness, with an emphasis on multiple stages of participation and a process for tracking citizen inputs. Participation mechanisms should be further improved and organized strategically to attract more citizens, with an emphasis on accessibility and convenience, and advertised in advance with enough supporting information.
- 2. Explore alternative methodologies for citizen engagement.** The municipality should supplement consultations with parallel mechanisms for participation that provide citizens with a sense of agency and a stake in municipal choices. This could involve a trial process of participatory budgeting that brings the planning and design of municipal initiatives closer to citizens, building their ability and appetite to engage with policymakers. It could also involve the adoption of e-platforms for public proposals, polls, and voting.³¹
- 3. Establish structures for collaboration with civil society.** The municipality should create and lead new platforms for citizen and CSO engagement on policy issues. This could take the form of a public council that meets multiple times a year to raise issues and discuss proposals. It could also take the form of sector-specific working groups bringing together relevant municipal officials and CSOs to discuss problems and find collaborative solutions.
- 4. Outsource some municipal initiatives to CSOs.** By letting the civic sector continue to atrophy, Gabrovo municipality could lose out on a pool of local talent and expertise that can help it address the needs of the local community. Instead, the municipality should consider delegating some areas of activity or initiatives to CSOs, fostering relationships of trust and mutual accountability.

³¹ One of the better-known ones is [Consul](#), which was the basis for Madrid's Decide Madrid platform in use since 2015; it is free software and adaptable to the needs of each municipality.



HASKOVO



MUNICIPAL PROFILE

Mayor (former, current)	Stanislav Dechev, re-elected
Geographic composition	Includes the town of Haskovo and 36 villages over 740 square kilometers.
Population	79,939
Primary economic sectors	With a rich history spanning centuries, Haskovo was heavily industrialized in the 20 th century and now has a diversified economy focused on food, machinery, and textiles.
Other	Home to a significant minority of ethnic Turks.

FINDINGS AND RECOMMENDATIONS

Existing transparency and integrity efforts are not a good match for citizens' needs

PROBLEM STATEMENT

Haskovo municipality's significant efforts to become more transparent over the last few years have resulted in a technically more open administration, albeit not practically so in the eyes of citizens. Effective transparency is also about communication with citizens, which means using channels and language that they can easily access and use. For many older people and those living in villages, who are unlikely to

take advantage of online sources and e-services, direct personal engagement will remain the main channel of communication, and municipal efforts at digital transparency will have little impact. Perceptions of opaqueness and arbitrariness cannot be easily dispelled if the communication approach does not match citizens' needs or addresses their concerns. In the case of Haskovo, this calls for a combination of digitalization and offline channels tailored to the different segments of the population.

FINDINGS: KEY STRENGTH

1. **There have been real efforts to increase transparency.** The administration publishes relevant information physically and electronically, as does the council, which also livestreams its sessions. Citizens seeking information on services can do so physically at the Center for Administrative Services, or digitally through a variety of e-services that include tracking of requests. The administration has sought to make it easier for citizens to submit access to information requests. And there have been steps to increase the transparency of public procurement, such as providing supplementary information to media outlets when tenders are announced.

FINDINGS: KEY VULNERABILITIES

1. **Many citizens do not use existing online information channels.** Despite significant improvements in e-services and online presence, many citizens still do not use the website in a regular manner. Instead, there is a reliance on direct contacts in the administration, or on village mayors as intermediaries who can help citizens address their needs.
2. **There are still suspicions that some things remain hidden.** The interviews revealed persistent perceptions among citizens about a lack of transparency, perhaps fed by a limited understanding of how municipal government works. This relates particularly to administrative procedures and deadlines that are sometimes interpreted as arbitrary. Citizen distrust is enhanced by the belief that one needs contacts to get something done, and by the lack of civic monitoring of public projects.

RECOMMENDATIONS

1. **Adopt a multi-pronged transparency strategy.** The municipality should develop a transparency strategy that is tailored to the needs of its citizens. This would include sustaining non-electronic channels for specific target groups, for example by supplementing the work of the Center for Administrative Services with periodic engagement at the village level, as well as conducting outreach efforts throughout the municipality to familiarize citizens with the physical and digital information channels available to them.

2. **Explain administrative processes to citizens.** Effective transparency depends on citizens understanding the information that they receive and the systems that they encounter. To that end, the administration should consider more effective ways of explaining administrative processes – requirements, deadlines, and procedures – so as to dispel concerns of arbitrariness. This could include carrying press conferences or village meetings before important administrative deadlines, working with village mayors to ensure they are effective intermediaries, and adding accessible guidance and supporting materials to the municipal website.

Inward-looking integrity efforts do not dispel suspicions of favoritism and corruption

PROBLEM STATEMENT

Haskovo municipality has adopted a variety of internal integrity systems that aid in the prevention of administrative corruption, taking discretionary power away from individual municipal officials and using legally-required mechanisms to spot potential conflicts of interest. However, these systems are not well known among citizens (and sometimes even among officials themselves). Without a proper understanding of prevention mechanisms, many in the municipality continue to assume that there are corrupt motivations behind certain key decisions, like awards for major public contracts.

FINDINGS: KEY STRENGTH

1. **The municipality has adopted multiple anti-corruption frameworks.** The administration has started work on a process to obtain formal certification of its administrative process to prevent bribery – ISO 37001 standard for anti-bribery management systems. This latest effort will supplement existing integrity mechanisms such as asset declarations, conflict of interest declarations, and the monitoring of public procurement, sometimes with external experts.

FINDINGS: KEY VULNERABILITIES

1. **There are suspicions of unfairness in public procurement.** Though there is a general sense of transparency in tenders and contract awards, there remain suspicions among citizens about favoritism: technical requirements tailored to benefit specific companies, criteria being too narrow and deadlines too short, or a small number of firms tending to win most contracts. Citizen concerns refer primarily to construction, public works, and urban planning.
2. **Municipal anti-corruption efforts are not well known.** Suspicions are not dispelled by anti-corruption efforts that are either not well known or assumed not to work in practice. Citizens continue to assume wrongdoing or that something is hidden. And they do not know where to go to raise concerns.

RECOMMENDATIONS

1. **Conduct awareness raising on integrity efforts.** The municipality should publicize its anti-corruption efforts both internally within the municipality and externally to citizens, raising awareness of their significance and how they are used in practice. Emphasis should also be placed on existing opportunities for citizens to report corruption or suspicions thereof.
2. **Provide greater transparency of public procurement processes.** Information published on the national platform for public procurement is not easily accessible to interested citizens. The municipality should go beyond what is required by national legislation and create a dedicated section on the website where citizens can easily find information on major municipal projects: technical specifications, merits of the winning bid, budgets, implementation timeline, checks on performance, and any changes to the original plan.

There is a disconnect between citizens and municipal decision-making

PROBLEM STATEMENT

Civic engagement is one of the pillars of trust and accountability, ensuring that citizens feel part of the process and understand how government works. Haskovo municipality has seen increasing efforts to provide opportunities for citizen feedback and collaborate with CSOs. However, participation remains low, and there is a troubling sense of disconnect between the community and its municipal leaders. There is a risk that distrust and disengagement will mutually reinforce one another, further undermining accountability mechanisms in the municipality.

FINDINGS: KEY STRENGTH

1. **The municipality makes efforts to listen and respond to citizens.** Public discussions held by the municipality are well publicized and organized, generating citizen engagement around key issues like the budget. Citizens can attend council sessions and ask questions. Overall, there is a sense that the municipality gradually has come to listen to citizens more.
2. **There have been tangible attempts at collaborating with CSOs.** There are some active CSOs in Haskovo, and the administration is open to working with them. There have been partnerships on EU-funded projects, as well as CSO-supported programs on participatory budgeting and increasing citizen/CSO engagement with the municipality. Municipal officials see the value added by such community outreach and the municipality supports it.

FINDINGS: KEY VULNERABILITY

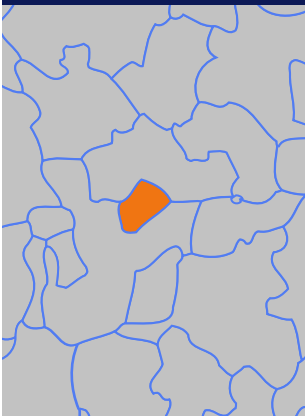
- 1. Civic engagement is very limited.** Despite increased responsiveness and accessibility of both administration and council, many citizens still do not know how to interact with them, or how to present their ideas and be part of the decision-making process. There are often very few citizens in attendance at public discussions or council sessions. And the procedures for processing citizen inputs and feedback are unclear. There are few CSOs with the capacity to contribute to planning or act as intermediaries, and ad hoc cooperation does nothing to counter fragmentation and disillusionment among civil society organizations which find it hard to coordinate without municipal leadership and do not believe that their work can have a meaningful impact on policy and decision-making.

RECOMMENDATIONS

- 1. Expand on existing participatory initiatives.** The municipality should expand and systematize existing and new processes for gathering citizen proposals, like participatory budgeting, to bridge the disconnect with citizens. It should develop clear mechanisms for tracking citizen inputs and providing municipal responses both as part of the formal legally required consultative mechanisms (including public discussions) and as part of the additional opportunities the municipality offers to citizens.
- 2. Conduct civic education efforts.** Targeted efforts at participation such as those mentioned above should be supported by a civic education campaign to increase citizens' understanding of how municipal institutions work and what opportunities for engagement are available to them. This campaign should include key municipal officials, like council members, deputy mayors, and heads of department, who are likely to interact with citizens and CSOs during the course of their work.
- 3. Establish consultative structures with CSOs to strengthen the civic sector.** The municipality can play a role in strengthening the civic sector, which ultimately will translate into more capable partners for identifying and tackling municipal challenges. To that end, consultative forums should be established either as a broad public council or as sector-specific groups that bring together CSOs and active citizens with relevant deputy mayors and municipal officials. The municipality should use these not only for information sharing, but for active discussion of municipal policies and plans.



PLOVDIV



MUNICIPAL PROFILE

Mayor (former, current)	Zdravko Dimitrov, Kostadin Dimitrov
Geographic composition	Includes the city of Plovdiv, which is over 102 square kilometers. It is divided into six administrative districts and is Bulgaria's second largest city.
Population	321,824
Primary economic sectors	An important commercial, industrial, and transport center, Plovdiv is home to Bulgaria's oldest and largest international trade fair.
Other	Plovdiv also has a rich heritage as one of the oldest cities in Europe, and it has become a major cultural center. It was named the European Capital of Culture in 2019.

FINDINGS AND RECOMMENDATIONS

Deficits in effective transparency feed suspicions of corruption among citizens

PROBLEM STATEMENT

Plovdiv municipality does more than others in terms of formal transparency and communication, and yet its citizens perceive it as silent and irresponsible on many issues that are important to them. Municipal leaders are sometimes perceived as silent, detached figures, almost anonymous, overseeing an administration that acts with few checks. Inconsistent transparency practices beyond what is legally required make it hard for citizens to understand municipal decisions,

and this is particularly troubling when outdated and formalistic integrity mechanisms fail to dispel citizen concerns about corruption arising from close links between politics and business. Regardless of how founded such perceptions may be, the lack of effective transparency is a clear vulnerability to corruption.

FINDINGS: KEY STRENGTHS

1. **There is transparency in key aspects of municipal administration.** Plovdiv municipality complies with all legally required aspects of formal transparency; in some cases, it goes beyond what national law requires. Access-to-information requests are processed and addressed. The administration even set up a public council through which citizens can join municipal officials in monitoring big projects.

2. **There are multiple channels available for communication with citizens.** The administration has multiple open channels of communication catering to different needs: a call center, a physical information center, a municipal website, and social media profiles. The Department “Communication and Marketing” publishes information on relevant issues. And contact details for key officials are available online, with some directorates reportedly being very accessible to interested citizens. The municipal council has likewise become more transparent over the years, livestreaming its plenary sessions and publishing its plenary agendas ahead of time.
3. **There are integrity mechanisms in place.** As in the other municipalities, all anti-corruption mechanisms required by law are present in Plovdiv. Aside from conflict-of-interest declarations and committees and an internal audit process, the administration also has a code of ethics and whistleblower rules, and makes all relevant integrity regulations available to municipal officials over an intranet. Plovdiv also has a functioning municipal ombudsman office where citizens can go to raise concerns about suspected malpractice in local government.

FINDINGS: KEY VULNERABILITIES

1. **Transparency efforts are not always comprehensive.** Despite efforts to release information in principle, the practice of municipal transparency in Plovdiv is not always tailored to the needs and interests of citizens, local businesses, and CSOs. The municipal website, for example, is hard to navigate. There are gaps in key sources such as the register of municipal properties, which is not supported by a map or such relevant information as the sales and usage. There is no information on the implementation of big municipal projects (e.g., delays, corrections to the budget, quality issues), and the public council set up to follow them does not discuss technical matters. A lot of information that could easily be made public can only be accessed via access-to-information requests.
2. **There are critical gaps in the communication of municipal decisions.** While municipal council plenary sessions are livestreamed, council committee sessions in which actual matters are debated are not. Nor are minutes of council sessions published and accessible to the general public. In terms of the administration, not all directorates are equally accessible, and often municipal officials tend to be very formalistic in communication, focusing on regulation rather than policy substance. The lack of coordinated messages or approaches across policy areas further undermines effective transparency.
3. **Integrity practices are not proportional to the perceived high risk of corruption.** Integrity mechanisms are in some cases outdated, and do not appear to be well known inside or outside the municipality. This is despite widespread concerns about a lack of real competition in public procurement, insufficient explanation of why certain companies tend to win bids frequently, or any public information on non-competitive contracts below the 30,000 leva threshold. Citizens have grown suspicious, particularly around construction projects and the management of municipal properties; they believe that tenders are tailored to specific companies and that one needs to know someone in the municipality to get something done. Despite this, there has been no emphasis by municipal leaders on implementing and publicizing corruption prevention mechanisms.

RECOMMENDATIONS

1. **Develop clear guidelines on transparency for municipal officials.** Effective transparency should be pursued more comprehensively and systematically by clearly explaining to all municipal officials why transparency and communication matter, and by providing them with clear rules and standards to follow. This should be coupled with addressing critical weaknesses: overhauling the registers of municipal properties and creating a public database of all non-competitive public contracts.
2. **Update and expand integrity mechanisms.** Given how widespread and troubling citizen perceptions of corruption are, Plovdiv municipality should adopt an anti-corruption strategy that brings its integrity mechanisms to the cutting edge of practice at the municipal level in Bulgaria, like ISO anti-bribery systems, digital reporting platforms, risk assessments, and whistleblower protection. The municipality should ensure that existing structures for citizen control are made effective, and even expanded to cover salient matters such as municipal debt, fairness and efficiency of municipal services, and other areas of public concern.

3. **Carry out integrity outreach within the municipality and externally.** The municipality should more proactively and systematically educate all municipal officials about transparency and integrity mechanisms, emphasizing not just the legal requirements but their accountability implications, and their impact on public trust in local government. These internal outreach efforts should be coupled with an external-facing campaign that expands public engagements for municipal leadership (townhalls, press conferences, etc.) with a specific focus on explaining decisions that may be misinterpreted as nefarious, such as the outcome of key procurement procedures.

Limited participation mechanisms fail to create meaningful accountability

PROBLEM STATEMENT

Plovdiv municipality differs from many other Bulgarian municipalities in how active and vocal its citizens are, and yet they are not provided outlets for meaningful participation. There is an overriding sense that formal consultative channels have no tangible impact on municipal policy. Citizens feel that they are not heard even when they speak with a strong voice; often they resort to protest because it seems like the only way to exert real influence. Both citizens and CSOs express concern that they cannot exert any control on decisions taken by municipal leaders and their implementation. This contributes to perceptions of detachment and opaqueness, which feed suspicions of malfeasance, as discussed above. The lack of a clear and meaningful accountability feedback loop is a major vulnerability to corruption.

FINDINGS: KEY STRENGTHS

1. **There are participation opportunities available for citizens.** The Plovdiv municipality holds public discussions on key matters, as required by law, including the budget, the integrated municipal development plan, and major debt decisions. Citizens can also attend municipal council sessions, where opportunities exist for them to ask questions and raise concerns.
2. **Plovdiv has a high civic mobilization potential.** Compared to other municipalities, Plovdiv benefits from a thriving social sector, with many associations and CSOs that the municipality sometimes partners with. More broadly, citizens

of Plovdiv are generally active around salient issues, engaging in public discussion and even protesting on occasion.

FINDINGS: KEY VULNERABILITIES

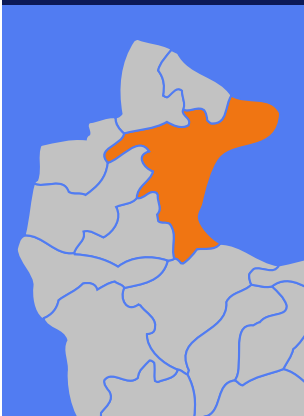
1. **Formal consultative channels lack a tangible impact.** Overall, interviewees shared a sense that participatory opportunities in Plovdiv municipality have not reached their full potential. This is partly due to the formalistic way in which they are organized, almost as if they were done by necessity (e.g., when required by law) rather than from a sincere desire to consult. For example, consultations are normally held during business hours, are attended primarily by municipal officials, and are not supported by any feedback information on whether citizen inputs would be taken into account. Citizen oversight mechanisms, when present, are equally formalistic and lacking substantive impact. There is no persistent, predictable, and interactive platform for citizens to interact with their local government.
2. **Citizens are more likely to protest than participate.** Citizens of Plovdiv have largely opted not to engage with municipal consultative mechanisms. They still participate in public discussions on salient issues like the budget or debt, but they do not engage with smaller scale yet equally relevant issues. Sometimes they only engage after a decision has been taken; other times, they resort to protest. Above all, they believe that decisions are already made and their views will not be taken into account.
3. **Engagement with civil society is not systematic enough.** Though consultation with CSOs, local businesses and other associations does happen, it is not systematic and the municipality does not make the most of the potential for collaboration on policy making and technical problem solving. Few CSOs in Plovdiv feel welcome to be part of the substantive process of formulating policies, plans, and activities for their respective sectors. It is not unusual for key policies to be developed without CSO or citizen input altogether, which deprives the municipality of external expertise and minimizes the opportunities for criticism and monitoring.

RECOMMENDATIONS

- 1. Strengthen and expand mechanisms for citizen consultation.** Plovdiv municipality should improve and expand its approach to public consultations, ensuring that citizens have clear and predictable opportunities for engagement during the early stages of decision-making, to avoid a backlash when decisions can no longer be reversed. A municipal ordinance could be drafted, modeled after those of other municipalities, to formalize a new approach. In addition, Plovdiv municipality should explore parallel structures that sustain civic engagement in between major decisions, such as a public council that meets regularly to discuss salient issues, and an e-platform (e.g., Consul) where citizens can react to municipal proposals and share some of their own.
- 2. Establish structures for engaging with CSOs on policy formulation.** There is a lot of room for Plovdiv municipality to review and expand how it engages with CSOs, working to include them in a more effective way in the process of policy formulation and monitoring. Together with the aforementioned public council, the municipality should establish sector-specific platforms bringing together CSOs, businesses, and local interest groups with council members and relevant municipal officials in order to tackle challenges and discuss proposals on such critical sectors for Plovdiv as social affairs, infrastructure, entrepreneurship, tourism, or culture.
- 3. Carry out a civic education campaign both for municipal officials and citizens.** The municipality should start sending out a strong message that channels for participation are not a mere formality. This message should be directed at municipal officials, reminding them that responsiveness to citizens' preferences is a core component of a democratic administration. But it should also be directed at citizens, explaining to them how decision-making works, what opportunities they have for participation, and why their engagement matters. In that regard, reporting on the impact of citizen feedback and on the work of citizen oversight bodies will be key to combatting civic disillusionment and forestalling protest.



VIDIN



MUNICIPAL PROFILE

Mayor (former, current)	Tsvetan Tsenkov, re-elected
Geographic composition	Includes the two towns of Vidin and Dunavtsi, and 32 villages over 501 square kilometers.
Population	46,269
Primary economic sectors	The main sectors of the local economy include manufacturing, trade, agriculture, and service.
Other	Sitting on the Danube and a trans-European transport hub, the town of Vidin has a rich cultural and historical heritage spanning centuries. Vidin province has the lowest per capita income in the country, and its population has shrunk significantly in the last two decades.

FINDINGS AND RECOMMENDATIONS

There is not enough transparency to enable accountability and information integrity

PROBLEM STATEMENT

Despite efforts at increasing the quantity and quality of information available to citizens, Vidin's municipal administration and council exhibit a rather formalistic and selective approach to transparency that ultimately harms public trust in municipal institutions. There is a perception among citizens that honest sharing of information is lacking, with public relations functions filtering relevant information rather than adding further transparency on the work of public officials. As a result, citizens have little to no awareness of

what the municipality does or why, creating fertile ground for false claims to be spread by third parties.

FINDINGS: KEY STRENGTH

1. There have been increasing efforts at **transparency in recent years**. The municipality of Vidin complies with legal requirements regarding transparency, with much information published on the municipal website, in accessible language, and a staffed information center open to the public in the municipal building. Leaders make good use of Facebook to communicate and interact with citizens, and municipal council sessions are open to the public. The administration acknowledges that further improvements can be explored going forward.

FINDINGS: KEY VULNERABILITIES

- 1. Publicly available information is sometimes incomplete.** Though there is formal transparency around key policy frameworks like the budget and public procurement, citizens often have limited information to follow up on processes and assess how they were conducted. Interviewees highlighted gaps, such as the lack of a public report on budget execution and updates, information on key public tenders being published after they are awarded, and limited information on project execution (quality control issues, timelines and delays, audits and fines, etc.). Decision-making is not always clearly justified, either: no explanation is provided on ordinances before they are adopted, council sessions are not livestreamed, and leaders tend not to share planned decisions in advance, even when they know strong public interest is to be expected, for example as is the case with the sale of municipal properties.
- 2. Mechanisms for getting information are generally weak.** Interviewees reported that it is hard to find information on the municipal website; moreover, there are no contact details for councilors or administration officials to whom queries could be directed. The municipality does very limited work with local media outlets, with press briefings being rare and mostly by the mayor. Overall, it is reportedly much easier to get information in person or through personal contacts than through any kind of formal communication channel.

RECOMMENDATIONS

- 1. Strengthen online platforms for effective transparency.** The municipal website should be overhauled to expand both content and user friendliness. Relevant information should be published in a timely and accessible manner, with good structure and clear digital markers showing when it is posted and edited, and with explicit timelines and deadlines when materials are part of a procedure or process. Council sessions could be easily livestreamed and archived online, as many municipalities already do. And council agendas for plenary and committee meetings should be made available to the public well in advance prior to sessions, together with a calendar of sessions.
- 2. Adopt a transparency policy.** The municipality should develop and adopt a transparency policy stipulating clear internal rules on

information sharing: what to release, when to do so, who is responsible for the dissemination, and through what channels. The policy should create a two-way system for communicating with citizens that provides easy entry points for relevant queries, such as publishing on the municipal website contact details for each councilor and senior administration official focusing on the various sectors of municipal activity.

- 3. Strengthen media engagement.** In support of new transparency goals, the municipality's public relations function can be strengthened by building a real partnership with local media, with regular press meetings where questions can be asked. This will help counter false claims and misleading information by third parties, as well as increase public trust in municipal institutions. In addition, it will strengthen the administration's grasp on public sentiment and what issues citizens may worry about most.

The municipality's integrity approach is insufficient for dispelling suspicions of corruption

PROBLEM STATEMENT

Despite high-level official commitments to fight corruption, the lack of well understood and consistently used integrity mechanisms contributes to widespread and persistent perceptions of undue influence by private interests and business groups on municipal decisions. Even when such perceptions are unfounded, they still undermine public trust. Moreover, the appearance of corruption can end up attracting corrupt actors who believe that their practices will go unchecked.

FINDINGS: KEY STRENGTHS

- 1. Various mechanisms to mitigate risks of corruption are in place.** Besides those integrity rules required by national law, Vidin has adopted various systems for minimizing the discretionary power of individual public officials, such as electronic systems and a process for requiring multiple signatures on key decisions. The municipality also reportedly has an ethics code (though it does not appear to be well known).
- 2. There have been clear high-level messages against corruption.** At the start of his first term in office, the current mayor clearly expressed a policy of zero tolerance of corruption. Since then, there have been tangible examples

of behavior supporting this policy, such as signals being referred for prosecution, officials being fired after accusations of bribery, and contracts terminated when they were perceived as detrimental to the municipality.

FINDINGS: KEY VULNERABILITIES

- 1. Limited knowledge and use of anti-corruption systems.** The interviews revealed a lack of awareness and practical knowledge about integrity mechanisms among both public officials and citizens. There is also no official communication to citizens on corruption challenges and the anti-corruption mechanisms that may prevent or remedy them.
- 2. Existing digital systems see limited use in practice.** Despite a desire to expand the use of e-services, their reach is held back by the advanced average age and low digital literacy of Vidin citizens. Sometimes systems are created but not maintained – for example, there have been complaints that the tool to submit an anti-corruption report on the website is not working. Even when systems for posting signals and queries are available, the aforementioned lack of information on key municipal processes and project execution makes it unlikely that citizens will raise concerns directly.
- 3. Persistent suspicions of corruption.** Interviewees highlighted concerns that corruption has a real impact (though hard to estimate or measure) on public policy in Vidin. Perceptions of corruption risk include unfairness in public procurement, nepotism in hiring for municipal jobs, using procedural tricks to avoid accountability in municipal budget spending, sale and management of municipal properties, and a passive approach to dealing with conflicts of interest.

RECOMMENDATIONS

- 1. Carry out integrity awareness raising efforts.** The municipality should launch an intrainstitutional awareness raising program to ensure all public officials are familiar with anti-corruption requirements and regulations. It should also introduce a system to track which municipal officials have acquainted themselves with these and which still need to do so. In parallel, there should be an outreach campaign to citizens in the municipality about integrity checks in procurement, spending, and hiring. This should help dispel persistent and widespread suspicions of corruption.

- 2. Increase access and monitoring by citizens on municipal decision-making.** Citizens will be less likely to assume dishonesty or corruption if they understand and can track the policy process. This could include explaining how decisions are taken, including if they are publicly consulted and how much they are influenced by the consultation. The municipality should also provide opportunities for citizens and CSOs to carry out oversight and control of large and significant municipal projects. A more defined and consistent approach to transparency – as outlined above – would complement these recommendations.

The mechanisms for citizen participation are weak or non-existent

PROBLEM STATEMENT

There is a high level of citizen disengagement and a low level of community consultation in Vidin municipality. Though this could be partly attributed to passivity among citizens or a lack of organization in civil society, officials have not established effective participatory mechanisms that demonstrate how citizen feedback is considered, even when it is given. In the absence of more impactful forms of civic engagement, citizens will continue to see municipal decisions as opaque and distorted by private interests.

FINDINGS: KEY STRENGTH

- 1. The municipality has a track record of attempting to engage civil society on key issues in some areas.** In recent years, the municipality of Vidin has demonstrated a willingness and ability to work with CSOs, community organizations, and private sector actors on some salient municipal issues. This has included establishing an advisory board on tourism, direct engagement of the mayor with local businesses, and collaboration with CSOs and community centers on social and cultural issues.

FINDINGS: KEY VULNERABILITIES

- 1. Citizens have limited opportunities for influencing municipal policy.** According to interviewees, public discussions are held in Vidin, but they are attended mostly by public officials. This can be partly explained by insufficient publicity and promotional efforts, but also partly by the fact that such discussions are used primarily to present and

explain decisions already taken. This means that citizen participation mechanisms are not used as an opportunity for citizens to provide inputs or feedback that would shape decision-making.

2. **The approach to working with civil society is not systematic enough.** Despite productive collaboration on some issues, overall, the municipality does not have a general, systematic approach for working with CSOs. There are no recurrent, predictable consultation practices and no broad-based forum for discussing local issues. Therefore, it is difficult for CSOs and community members to find ways to make meaningful contributions to the policy issues that they care about.

RECOMMENDATIONS

1. **Develop a municipal ordinance on public consultations.** The municipality would benefit from having an ordinance providing an approach and procedures to ensure a stronger consultative process that adds rigor and flexibility to its organization, enhances communication with citizens, and provides them with a transparent system for tracking when their inputs will be sought, how they can provide them, and what influence they have over time.
2. **Establish official forums for working with CSOs.** The municipality should move away from the ad hoc approach currently in place and instead work with local CSOs to establish consultative structures where community groups, businesses, and active citizens can come together to discuss shared problems and define shared solutions. This may take the form of a general public council that meets quarterly, or dedicated sector-specific forums that convene with more frequency. Above all, the municipality should reach out to CSOs as partners and mediators to work together for more citizen engagement.

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