

ASSESSING MUNICIPAL VULNERABILITIES TO CORRUPTION IN BULGARIA: AN EXAMINATION OF TEN BULGARIAN MUNICIPALITIES

JULY 2022

Assessing Municipal Vulnerabilities to Corruption in Bulgaria:
An Examination of Ten Bulgarian Municipalities

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Introduction

Report aims and structure

The following report presents the findings of a Vulnerabilities to Corruption Approach (VCA) assessment of ten Bulgarian municipalities carried out by the International Republican Institute (IRI) between October 2021 and March 2022.

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, NGO representatives, 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 shaping corruption prevention at the national and municipal levels in Bulgaria, and presents a summary of key findings from the ten 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.

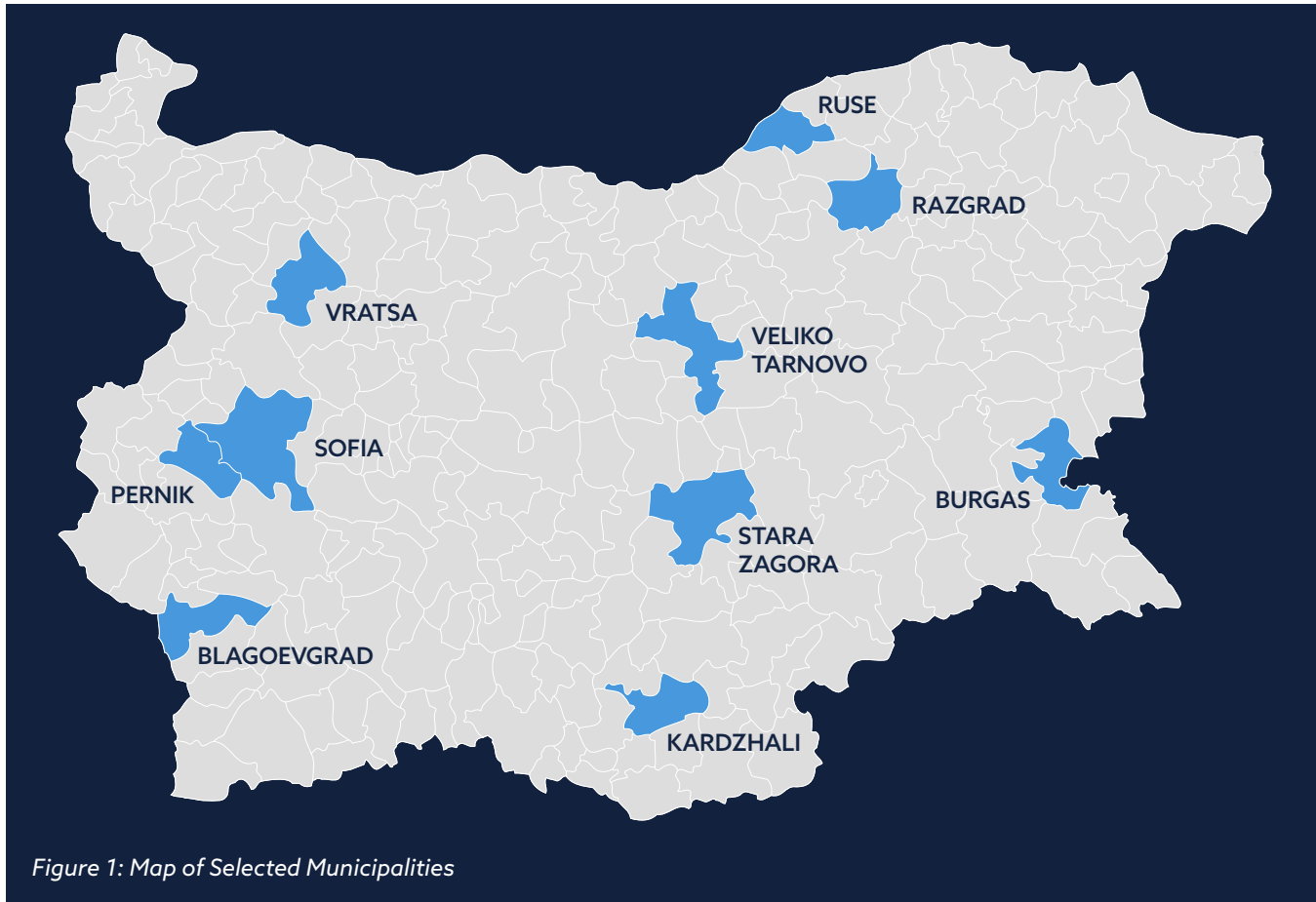
IRI has historically been active in Bulgaria, with programming beginning in the early 1990s. IRI's work included strengthening political parties, increasing youth and women participation in the political process, and conducting public opinion research. IRI's programming ended in 2005, but following an 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 and municipal town halls to better link citizen demand for transparency and integrity with local elected leaders. Finally, IRI supports municipal working groups, comprised of both government and non-government leaders, to address the VCA findings.

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 determine 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 constraints, challenges, and opportunities. 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. Lastly, IRI 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 which is presented to the working group for feedback. Through the VCA assessment, IRI identifies corruption-related risks and gaps in government processes and supports government responses to these issues.

In Bulgaria, IRI carried out VCA assessments in ten municipalities. In alphabetical order, they are Blagoevgrad, Burgas, Kardzhali, Pernik, Razgrad, Ruse, Sofia, Stara Zagora, Veliko Tarnovo, and Vratsa. 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

encompass 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 trends and factors, as well as municipal-level ones.

The second stage of the VCA assessment consisted of semi-structured interviews with key informants in each of the ten municipalities. A total of 115 people were interviewed, of whom 64 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

MUNICIPALITY	MUNICIPAL GOVERNMENT				CIVIL SOCIETY				TOTAL
	1.1 Mayor's Team	1.2 Admin.	1.3 Council	1.4 Other	2.1 NGO	2.2 Media	2.3 Business	2.4 Other	
Blagoevgrad	1	1	2		2	1	1	3	11
Burgas	1	3	4		4	2	1		15
Kardzhali	1	1	3		3	1			9
Pernik	1	2	3		3	1	1		11
Razgrad	1		3		5	1	1		11
Ruse	1	1	2		4	1		1	10
Sofia	1	1	4		7	1	1		15
Stara Zagora	1	1	1	1	5		1		10
Veliko Tarnovo	1	2	3		4	1	1		12
Vratsa	1	1	3		4	1	1		11
Total	10	13	28	1	41	10	8	4	115

comprising NGO representatives, business association representatives, journalists, academics, activists, informal groups, and engaged citizens.¹ Distribution by category and municipality is presented in the table above.

The interviews were conducted remotely via Zoom (due to travel restrictions and risks from COVID-19) by a mixed local, international, and U.S.-based team of IRI staff between October 25th, 2021, and February 16th, 2022. Ninety interviews were conducted in Bulgarian, with support from a local interpreter for non-Bulgarian team members, and 25 in English.²

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. 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 five cross-cutting themes—transparency, integrity, participation, public perceptions, recommendations—and prompts and probing questions tailored to the different categories of interviewee.³

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

¹ In some instances, interviewees had both an NGO background and served as council members. Those interviewees are counted in these VCA reports as council members.

² 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.

³ 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. Preliminary versions of each municipal VCA report were also presented to working groups comprising stakeholders from their respective municipalities, who provided a reality check on IRI’s interpretation of facts. Feedback from this validation exercise was used to ensure the final text was empirically valid and consistent with the views and experiences of the local community and a useful springboard for reform-oriented conversations.

interest groups compete to use power over legislation and regulation for the extraction of rents (payments, favors, political support, etc.).⁴ This is reflected in global corruption surveys, where Bulgaria is regularly rated as the most corrupt country in Europe. The 2021 Transparency International (TI) Corruption Perceptions Index scores it 44/100, ranking the country in the 69th position worldwide.⁵ The World Bank's Worldwide Governance Indicators scored "Control of Corruption"⁶ for the country in the 50.48 percentile rank.⁷

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 in which elites captured valuable state resources left a residue of anti-Western, anti-neoliberal resentment. The EU accession process accelerated the pace of democratization and anti-corruption reform, including the adoption of a Cooperation and Verification Mechanism, later replaced by a Rule of Law Mechanism, that acted as a sort of conditionality tool for ensuring that the country complied with European standards.⁸ However, momentum for reform gradually dissipated after 2007, with statistics showing not just a slowing but even some regression to past practices.⁹ Successive governments have arrived in office with strong anticorruption 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, corruption was a priority issue throughout an unprecedented series of three general elections in a single year.

In 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).¹⁰ In IRI's own polling of its ten program municipalities fielded in February 2022, the percentage of respondents who reported corruption in their country as very or somewhat serious problem ranged from 81 to 100 percent.¹¹ Despite this, 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."¹²

Corruption and related crimes are regulated in the Bulgarian Criminal Code and the Unified

⁴ 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/>).

⁵ Transparency International, 2021, "Corruption Perceptions Index 2020" (<https://www.transparency.org/en/cpi/2020/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.

⁶ 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.

⁷ World Bank, 2022, "Worldwide Governance Indicators" (<http://info.worldbank.org/governance/wgi/Home/Reports>).

⁸ 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/>).

⁹ 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>).

¹⁰ Transparency International, 2022, "Global Corruption Barometer: European Union" (<https://www.transparency.org/en/gcb/eu/european-union-2021>).

¹¹ International Republican Institute, 2022, "Public Opinion Survey: Residents of Bulgaria" (<https://www.iri.org/resources/public-opinion-survey-of-residents-of-bulgaria/>).

¹² 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>).

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 explicitly forbids anonymity for whistleblowers.¹³ In 2018, the Act on Counteracting Corruption and on the Forfeiture of Illegally Acquired Property established a new 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. However, the legislation's efficacy is questionable. On one hand it gives a very restrictive definition of "related persons" that does not include friends and associates, and on the other it focuses on the exercise of power for private benefit, excluding considerations of indirect gain.¹⁴ Despite the new law and a high degree of public interest, recent years have seen a negligible number of convictions for conflict of interest and corruption. Instead, there is a pattern of suspended prison sentences, acquittals, unexplained delays, and lack of official reporting on the progress of cases.¹⁵ Bulgarian civil society, with considerable support from the United States 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.¹⁶ 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.¹⁷ The government's neglect of NGOs 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 sustained salience of corruption at the national level and increased popular demand for a response set the context for efforts to combat vulnerabilities to corruption at the municipal level, where corruption is suspected of disrupting the delivery of government services, directly affecting the lives of constituents, and contributing 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 neighborhoods within the municipality. Nevertheless, advances in political and administrative decentralization have not kept up with 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

¹³ 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_ro_l_country_chapter.pdf).

¹⁴ Anti-Corruption Fund, 2019, "Anticorruption Institutions: Trends and Practice" (<https://acf.bg/en/antikoruptionsionni-institutsii-tendents/>).

¹⁵ Anti-Corruption Fund, 2021, "Anti-Corruption Institutions: Escalating Problems" (https://acf.bg/wp-content/uploads/2021/07/ACF_ENG_Online_Jul15.pdf).

¹⁶ Freedom House, 2022, "Freedom in the World 2021: Bulgaria" (<https://freedomhouse.org/country/bulgaria/freedom-world/2021>).

¹⁷ 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).

concentrate political power, and local business interests can have significant sway over policy issues such as zoning, public works, and air quality.

In 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).¹⁸ In IRI's municipal poll, the percentage of respondents who reported corruption in their municipality as very or somewhat serious problem ranged from 50 to 100 percent.¹⁹ 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.²⁰ The widespread belief that bribes are an effective way of securing opportunities for private businesses also creates a supply-side incentive for corruption.²¹

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. And although councils have set up standing committees, with representation from all political parties holding seats in the council, to receive alerts and complaints about conflict of interest and corruption, and municipal administrations have

similar committees, these bodies have only the power of referral, and they are not used frequently due to their limited ability for objectivity.

The Anti-Corruption Fund (ACF), a Bulgarian NGO, tracks prosecutions and conflict of interest investigations of high-level local officials. Its 2021 report documents 16 cases against mayors, of which 13 ended in acquittal and only three in conviction. Between 2018 and 2020, no conviction resulted in imprisonment. Cases included former mayors of Pernik and a former deputy mayor of Sofia. ACF also reviewed 96 complaints of conflict of interest against local officials. These included the former mayor of Blagoevgrad. The Commission for Counteracting Corruption and Illegal Assets Forfeiture established conflict of interest in only a minority of cases.²²

The limited impact of formal anti-corruption mechanisms makes government transparency and citizen participation even more important 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.²³ 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 NGOs are either local interest associations (sports clubs, retiree groups, etc.) or implementers of delegated social services²⁴ (childcare, services for victims of domestic violence, special needs education, etc.) for the municipality—civic-focused NGOs are almost non-existent outside of the capital. Independent local media are equally hard to find.

¹⁸ Transparency International, 2022, "Global Corruption Barometer: European Union" (<https://www.transparency.org/en/gcb/eu/european-union-2021>).

¹⁹ International Republican Institute, "Public Opinion Survey: Residents of Bulgaria" (<https://www.iri.org/resources/public-opinion-survey-of-residents-of-bulgaria/>).

²⁰ 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/>).

²¹ 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>).

²² Anti-Corruption Fund, 2021, "Anti-Corruption Institutions: Escalating Problems" (https://acf.bg/wp-content/uploads/2021/07/ACF_ENG_Online_Jul15.pdf).

²³ 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).

²⁴ 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.

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 in order 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 to the team that, although each municipality had a unique context, most of them faced broadly similar challenges. This section presents five cross-cutting vulnerabilities to corruption, as well as general recommendations to address them, which can be a valuable reference point for other anticorruption stakeholders in Bulgaria and abroad. More detailed and tailored problem statements and recommendations can be found in the chapters covering each of the municipalities.

1. Corruption prevention mechanisms are seldom used

The VCA assessment team observed an interesting paradox during the municipal interviews: though corruption is seen as a salient problem for Bulgaria, and despite surveys showing a belief that many local officials are corrupt, relatively little evidence surfaced about the use of corruption prevention mechanisms. All ten municipalities working with IRI 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. However, these mechanisms were not used often, if at all, and in some cases, interviewees did not know they exist.

This could be attributed to several possible causes. Perhaps there simply is no corruption at the municipal level—though this is contradicted by survey data as well as by allegations shared with the assessment team. Maybe local stakeholders simply have a high threshold for what constitutes corruption, or they are more likely to see it at the national level, where cases are routinely covered by the media, but not at the municipal level. It

could be that citizens are unwilling to report corruption because of reputational concerns, especially in small communities where everybody knows each other or, more worryingly, because of fear of reprisal. Lastly, it could be that citizens have given up on trying to tackle corruption at the municipal level given the disappointing track record of investigations.

Vulnerability. Regardless of the cause, the non-use of corruption prevention mechanisms is a key vulnerability because it can lead to knowledge gaps, trust gaps, and even enforcement gaps. Without a strong deterrent, corrupt actors are much more likely to seek illicit means to advance their interests. Above all, in a context of disinformation 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 communication efforts to educate citizens and public officials about anticorruption 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.

2. Transparency is practiced without attention to accessibility of information

All municipalities covered in the VCA are committed to transparency. All municipal administrations comply with national legislation regarding open public procurement, hiring, and financial awards. In some cases, mayors have gone beyond minimum requirements, pushing their teams to communicate more and carry out their everyday duties in a more transparent manner.

However, most municipalities approach transparency from the standpoint of one-sided compliance. That is, they release the information that they have to make public without necessarily considering whether such information is accessible, easy to understand, or even relevant to citizens' concerns. Municipal budgets are often published in full, in formats and language that only economists and public sector managers can

understand. There is transparency on the award of public contracts, but little follow-up information on their execution and on whether contractors are adhering to the quality standards set in the contract. goals and deadlines with quality work. Transparency is also hampered by a lack of clear and consistent timelines for communication with citizens; for example, the deadline for citizen's input for public consultations is not clearly stated, announcements for upcoming meetings are published at the last minute, and the results of municipal decisions are published with an unexplained delay. The entire system of transparency tends to rely on municipal websites that can be incomplete, hard to navigate, and missing key functionalities.

Vulnerability. Inaccessible, hard to understand, poorly 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 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 in many of the assessed municipalities are already beginning this work.

3. Unresponsive administrations lead to the use of informal channels

Just as they have committed to increased transparency, many mayors would like their municipalities to be more responsive to citizen concerns. Government officials often interact with voters directly, whether in person or via social media, such as Facebook, as well as explore different channels of communication through which queries, complaints, and alerts can be posted. In some instances, this has allowed municipalities to identify issues of serious concern

to citizens, which in turn has led to decisive action to address them.

Even though most mayors are generally seen as energetic and approachable, citizens do not view their municipal administrations and councils the same way. Interviewees across all municipalities found local government procedures cumbersome and hard to follow and confessed to not knowing how policy decisions were made. The VCA team received complaints that some council members were virtually anonymous, administration officials unresponsive and even dismissive, and queries and complaints unaddressed. Whether citizens do not know where to turn when they have a problem, or because they have had bad experiences with formal reporting mechanisms, in many municipalities the mayor has become the sole focal point of accountability, with citizens, NGOs, and businesses reaching out to them personally instead of going through proper channels.

Vulnerability. There is a legitimate perception that in order to get things done one must go to the mayor directly, and therefore the use of informal channels (such as calling or texting the mayor directly) may be done in good faith. But this emphasis on direct access to the mayor raises multiple red flags. It makes local governance inefficient, as the mayor is swamped with complaints and requests. It creates a discriminatory system of accountability, privileging those who can gain access over those who cannot. It creates the potential for corrupt actors to target the mayor as the only official with perceived decision-making authority. And it shifts public attention away from council members and other public servants, thus diminishing the chances of detecting corrupt behavior. Furthermore, this perception could lead to a vicious cycle where the balance of power between the mayor and the council is further skewed.

Recommendation. IRI recommends that municipalities strengthen and expand official communication channels, particularly internet platforms where requests and alerts can be tracked, and that they bolster the constituency-support function of the municipal council. This should be supplemented with better public

information on citizens' rights and avenues for making their voices heard.

4. Formal participation mechanisms cannot overcome citizen disengagement

By law, municipalities must consult citizens on major issues like budgets, municipal investment plans, and other strategic documents. Some municipalities go beyond this legal requirement, reaching out to citizens on a wider spectrum of issues as well as on smaller-scale decisions. Others have adopted regulations that articulate the public consultation process in greater detail. Some have built digital platforms that enable citizens to express their views more easily and frequently. All municipalities covered by the VCA assessment express a desire to engage citizens more effectively.

Despite improvements in public participation mechanisms, interviewees from all ten municipalities and from diverse backgrounds shared a pessimistic assessment of civic engagement. For their part, municipal leaders are generally disheartened by low attendance at public discussions, which can partly be explained by the legacy of a communist regime which actively discouraged Bulgarians from civic participation. Civil society, meanwhile, complains about formalistic consultations attended primarily by public servants, lack of opportunities to make their opinions heard, and a record of decisions made without much citizen input. In sum, municipal participatory mechanisms are not seen by citizens as 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. As a result, politicians may feel less compelled to explain the rationales for their decisions, and citizen distrust for their leaders could increase. This accountability gap is a key vulnerability to corruption, and civic monitoring is a much-needed corrective to the existing limitations of anti-corruption legislation. The accountability gap also creates a vacuum which corrupt actors could easily 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. This VCA presents valuable models of both.

5. Civil society does not play a substantive role in municipal policy

Municipalities work with local associations and NGOs daily, whether they contract them for providing delegated services, offer them small grants or use of municipal premises, or ask them for assistance in understanding critical issues. All ten municipalities that were part of the VCA reach out to NGOs, to a varying extent. 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. A few of the municipalities also have experience with citizen mobilization and protest impacting policy decisions.

IRI's assessment found, however, too few examples of structured, inclusive, action-oriented platforms through which municipalities and NGOs 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 NGOs 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. Moreover, even when civil society does engage with local government, it is rarely to contribute to municipal strategies or supplement the administration's technical needs. Instead, NGOs are either financially dependent on the municipal budget, invited to contribute to small projects, or asked to provide assistance with addressing a localized crisis.

Vulnerability. Much of the weakness of municipal civil society can be attributed 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 citizen's 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 fora.

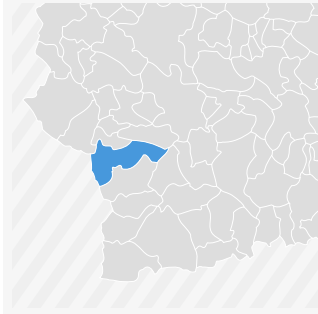
Implications for policymakers

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 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. 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 take action in response.

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

1. **The focus of Bulgarian anticorruption activity, both governmental and non-governmental, should expand beyond Sofia and other large cities.** Central government agencies and NGOs should pay increased attention to the needs of citizens and public officials at the local level. Only then will gains made at 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 NGO 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.

BLAGOEVGRAD



MUNICIPAL PROFILE

MAYOR	Ilko Stoyanov
GEOGRAPHIC COMPOSITION	Includes the town of Blagoevgrad and 25 villages over 620 square kilometers
POPULATION	75,000
PRIMARY ECONOMIC SECTORS	Industry, trade, services, and culture
OTHER	Home to the American University in Bulgaria

Findings and Recommendations

Deficits in municipal government transparency feed suspicions of corruption

Problem Statement

Despite recent efforts to make the municipality and the office of the mayor more open and visible to citizens, there is insufficient citizen oversight over financial activities, like public procurement processes, management of municipal properties, and direct awards. Interviewees said that access-to-information requests are often submitted for information that should already be publicly available and they expressed lingering concern about the opaqueness of the local government—extending even to the perceived “anonymity” of key public officials—which is inevitably linked in their minds to concerns about abuse of office, nepotism, patronage, and other forms of corruption. Given this, it seems an opportune time to explore how an official commitment to transparency and integrity could dispel suspicions of corruption on the part of citizens.

Findings: Key Strength

1. **The administration is committed to transparency and wants to continue improving in that regard.** Interviewees agree that, since the last election, there has been a noticeable shift toward more openness by local authorities. It is common knowledge among stakeholders that the new mayor has made transparency an explicit priority. Municipal procurement and recruitment procedures have been made more transparent. There are regular updates on the municipal website and social media. In general, there is a common understanding that more openness is required for building trust with citizens.

Findings: Key Vulnerabilities

1. **Public information is outdated or incomplete and can be hard to understand.** Citizens find the municipal website hard to navigate, outdated, and missing crucial details like deadlines or requirements for certain administrative services. When a policy is newly adopted or amended (e.g., strategic documents and plans), it can take a long time for the text to be uploaded to the website. Regarding procurement, contracts are published under a “profile of the buyer”

section, but few know what that section is for or how to reach it, and even then, the volume of information is too large to sift through. Little to no information is available on what happens after contracts and grants are awarded, including payments to providers and any quality controls for publicly funded projects. There is also some opacity around how funds are allocated by the municipality for contracts for information services with local media outlets.

2. **There is an overreliance on paper-based administration and in-person contacts.** A lack of electronic services means that citizens are forced to carry out most administrative transactions on paper and in person. Interviewees shared a widespread perception that official channels are not very useful, which makes people believe one can only get things done by knowing someone. This creates a perception of key municipal government officials as gatekeepers who arrange access in exchange for support or personal gain.
3. **The municipal council is not transparent enough.** No contact details or background information are provided on council members, nor is there a published summary of what committees they serve on. While the council agenda is public, its heavily technical style makes it hard for citizens to understand. In some instances, even councilors themselves receive agenda changes at the last minute. Agendas for council committee meetings are never made available to the public in advance. There are no reports covering the activities of the council or its committees. Indeed, some committees are virtually unknown to the public, which may explain why the committee tasked with receiving reports of possible corruption has not received any in recent years.

Recommendations

1. **Revamp the municipality's digital presence.** The structure and presentation of the municipal website should be revised with an eye towards user friendliness, focusing not on what the administration publishes, but on the services and information that matter most to citizens (a user experience survey prior to any re-design would be ideal). This would include a stronger focus on key administrative procedures and municipal government processes, such as public consultations, with clear deadlines and requirements, as well as the links to relevant public registers where citizens can track contracts, grants, use of municipal properties, etc. Internal deadlines should be set for uploading or updating a document after its formal adoption (e.g., within two weeks). The continued digitalization of government services could also begin to address the inefficiencies of a paper-based administration.
2. **Strengthen transparency through civic outreach and partnership.** Publication of information on the website does not necessarily increase citizen awareness and understanding if such information is too technical or presented in an inaccessible manner. Municipal officials can work with the media and other community voices (for example, academics) to explain how municipal government works and how public policy shapes lives. This can include activities such as clearly presenting which departments are responsible for which functions or explaining the budget cycle in a more accessible manner. Increasing the visibility of council committees is highly necessary and could be achieved by dedicated web pages with an introduction to their work and responsibilities, as well as a list of members, a calendar of meetings, etc. The municipality could also pilot a civic monitoring approach, inspired by the model of the EU's "integrity pacts," for interventions

that would benefit from more community involvement.²⁵

3. **Increase access to public officials.**

Transparency of key public officials' contact information can counter perceptions of an opaque and remote municipal government. At a minimum, the contact details (phone, email, social media) and areas of responsibility of senior administration officials and all council members, should be clearly displayed on the municipal website. This basic level of transparency allows citizens to know who to contact on particular issues, especially when raising concerns about corruption. A more robust response would include increasing visibility in the community by holding regular reception days for meetings with citizens in Blagoevgrad and surrounding villages, as some are already doing.

Lack of structured opportunities for citizen engagement and oversight results in limited accountability

Problem Statement

Citizen participation in Blagoevgrad's public policy development and decision-making processes is low—"embarrassingly" so, according to some interviewees. While the municipality holds public consultations as required by law and on critical issues, these are attended almost exclusively by administration and council officials. Citizens in Blagoevgrad are, in general, demotivated and demobilized. This is partly due to a history of lack of collaboration between local government and society, but also partly because of a lack of structured and sustainable opportunities for engagement. Instead of contributing to policies, citizens simply complain about outcomes, predominantly online. When elections become the only form of accountability, there is a risk of heightened politicization and polarization, which

further undermines the community's ability to work together.

Findings: Key Strength

1. **There have been recent efforts to reach out to civil society and include citizens' views in municipal strategies.** The new administration has emphasized the visibility of, and engagement in, the mayor's office compared to previous administrations. As part of the preparation of the Plan for Integrated Development of the Municipality, the municipality reached out to universities, businesses, and other community stakeholders in order to gather inputs and secure civic buy-in; there was also an online survey open to citizens. There have been dedicated working groups for tackling salient local issues, which represents a positive change relative to a previous pattern of total disconnect between government and society. Overall, citizens are becoming more active and vocal, and local media outlets are working to ensure that their voices are heard.

Findings: Key Vulnerabilities

1. **Opportunities for public participation are not designed to encourage citizen engagement.** The municipality holds consultations on the budget, according to law, but presents a fully developed draft that is unlikely to change, making consultations more akin to rubber-stamping than a participatory event. Announcements come at short notice, and sessions are held during working hours. In the case of the online survey around the integrated development plan, interviewees expressed regret that it was open to comments for only a relatively short period of time during the month of August, when many people are on vacation. Likewise, agendas for council sittings are so condensed that, according to some interviewees, it would be hard for citizens to know what will be discussed and to ask

²⁵ An integrity pact is an agreement between a contracting authority and economic operators bidding for public contracts that they will abstain from corrupt practices and will conduct a transparent procurement process. To ensure accountability and legitimacy, an integrity pact includes a separate contract with a civil society organization which makes sure all parties comply with their commitments." See more at: https://ec.europa.eu/regional_policy/en/policy/how/improving-investment/integrity-pacts/

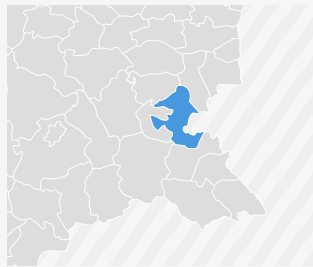
informed questions. Often citizens are asked to wait until the end of a council plenary meeting to make a formal statement or ask a question which, apart from requiring a number of hours of spare time, also sends a signal on the importance attached to citizen input.

2. **Low trust in institutions discourages citizens from participating in public affairs.** Despite ongoing attempts to increase transparency and accountability, interviewees stated that citizens have low trust in the ability or willingness of municipal authorities to take their input into consideration. Because of this, they do not see themselves as part of the municipal government, and they believe this will never change. Young people are particularly disillusioned and disaffected, and their civic involvement is weak. This puts a damper on grassroots mobilization.
3. **There are no structured mechanisms for engaging with civil society groups and businesses.** While the new administration has reached out to businesses, universities, and regular citizens, these efforts have been *ad hoc* and do not ensure sustainability. Interviewees indicated that there is no public council or equivalent consultative body, nor sector-level councils with NGOs and issue experts where the municipality could discuss strategies and policies. There used to be a public council focused on culture, but it last met in 2012.

Recommendations

1. **Establish consultative bodies which bring representatives of the municipal government and citizens together.** In the future, it will be easier for the municipality to seek citizen input in *ad hoc* processes, like the development of the integrated plan, if it can rely on well-known and functioning consultative bodies. Other municipalities in Bulgaria have established a public council that meets monthly or quarterly to discuss issues of general concern. Another option is to establish dedicated sector-level councils, on social affairs, urban infrastructure, tourism, and culture, and so on, that unite relevant administration officials and council members with NGOs, businesses, and interested citizens. Permanent consultative bodies would gradually generate trust and build participation “muscle.” They also increase policymaking transparency by supporting CSOs and stakeholders to consult with government officials early in the drafting stage for strategic documents and plans.
2. **Make public consultations and council sessions more accessible and attractive.** The substance and format of public consultations should be made public well in advance. There should be a basic explanation of the problem to be addressed and the process for doing so, as well as links to all supporting documentation. Citizens would be more likely to attend if they knew the specific questions for discussion, whether they will have an opportunity to make contributions, and what the follow-up to their proposals will be. The development and adoption of a municipal ordinance and “manual” on public consultations would go a long way toward reassuring citizens that their voices will be heard and clarifying requirements for municipal officials, who may otherwise be unfamiliar with outreach tasks. Clear rules on procedures and timing for citizens’ statements and questions during council plenary meetings should be adopted, putting them, preferably, at the beginning of sessions. As digitalization improves, giving citizens opportunities to ask questions or make statements online would also lower barriers to participation.
3. **Reach out to young people in promoting policies and public discussions.** Multiple interviewees highlighted young people as a source of fresh ideas and energy who can help with promoting public engagement on issues. To that end, the local universities are an untapped reservoir of potential active citizens. This kind of youth- and student-focused public engagement would highlight one of the key strengths and distinctive features of the Blagoevgrad municipality.

BURGAS



MUNICIPAL PROFILE

MAYOR	Dimitar Nikolov
GEOGRAPHIC COMPOSITION	Includes the towns of Burgas and Balgarovo and 12 villages over 488 square kilometers
POPULATION	230,000
PRIMARY ECONOMIC SECTORS	Fishing and tourism, with the largest port and oil refinery

Burgas is one of ten municipalities selected for IRI's VCA process in Bulgaria.²⁶ It is situated in the east of the country and encompasses the eponymous main town, as well the town of Balgarovo and 12 villages spread out over 488 square kilometers. With a total population of over 230,000, Burgas is Bulgaria's fourth city by population, and the second on the country's Black Sea coast, which makes it a center for the fishing and tourism industries. Burgas also hosts the country's second largest airport, largest port, and largest oil refinery.

of the quantity of information made publicly accessible to citizens. Too much information, however, can easily overwhelm citizens and journalists who do not have the time or expertise to sift through reams of announcements and technical documents and determine exactly how decisions are being made and what their impact is. This has made it difficult for citizens to follow up on key decisions or have sufficient advance information on upcoming processes and discussions.

Findings and Recommendations

An emphasis on formal transparency has not translated into accessibility of information

Problem Statement

Burgas is a top performer in the country's municipal transparency assessments, because

Findings: Key Strengths

1. **Municipal leaders are committed to making Burgas a role model for transparency.** Burgas regularly comes up as one of Bulgaria's best performers in transparency and openness,²⁷ and local leaders are committed to maintaining Burgas' reputation as a top performer and role model for other municipalities and towns. Council sessions are open to the public, and a wealth of official information is available to citizens online, encompassing municipal regulations and decisions, budgets, tenders

²⁶ The ten municipalities, in alphabetical order, are: Blagoevgrad, Burgas, Kardzhali, Pernik, Razgrad, Ruse, Sofia, Stara Zagora, Veliko Tarnovo, Vratsa.

²⁷ See, for example, Transparency International's 2016 Local Integrity System in Bulgaria (<https://transparency.bg/local-integrity-system-in-bulgaria/?lang=en>).

and awards, licenses, competitions, hiring, audit summaries, and other administrative procedures.

2. **The municipal administration and council are generally open and responsive.** The mayor and council members have reception days, and most interviewees agree that communication with municipal officials is easy and seamless, whether it is by phone, email, or via Facebook. The administration is proud of having a track record of responding to almost all access to information requests filed by citizens and the media, with just a handful denied in recent years. Citizens can post signals on the municipality's website and, according to interviewees, there is a commitment to address them within a couple of days. Interviewees also say the public relations office is said to have a good working relationship with local journalists.

Findings: Key Vulnerabilities

1. **Inconsistent accessibility and comprehensiveness of information.** Perhaps as an unintended consequence of releasing so much information, some interviewees expressed concern that the government's website is not always easy to navigate, and that technical information is not always digestible. For example, there is no standard for presenting the budget to non-economists, and in some cases the budget was shared on the website in summary, and not in full. There are also concerns from interviewees about the completeness of publicly available information.
2. **Decision-making and administrative procedures are sometimes hard to follow.** Interviewees found the notices on upcoming consultations or council sessions incomplete, and some pointed to changes made without advance warning, such as last-minute points added to the municipal council's agenda that limit citizen's ability to follow discussions. Others shared that some council decisions are published in summary, not in full. The municipality has several ordinances stipulating how various types of NGOs are funded. Still, concerns were raised about

a lack of clear and transparent information on how certain budget allocation decisions in respect to NGOs are made. This might be due to a lack of an overview of funding processes. It is also not easy to track the status of applications, comments on these, and other administrative procedures.

Recommendations

1. **Make the websites of the municipality and the council more user friendly.** The municipal website should be well organized and presented—focused on the user experience—without losing the volume of legally required information. It should be more searchable, which would allow for citizens to better understand policies and project implementation. The website could also incorporate a system that allows citizens to track their communication with the municipality, e.g., signals, complaints, requests, official letters, etc.
2. **Adopt clear standards and procedures for releasing information.** Burgas can continue to be a trailblazer by demonstrating how transparency is executed, in practice. The adoption of good practices would go a long way toward ensuring that information is released in a timely manner. For example, the agendas of council meetings should be published on the council website with advance notice, accompanied by a breakdown of the topics for discussion, and supplemented with supporting materials that may impact on a decision. Likewise, information on municipal projects should be kept up to date, after any changes have been made to the original proposal. Lastly, the municipal budget could be made more understandable by attaching to it an easy-to-read narrative summary. Communications officers need to be sensitized to citizens' need to understand official information.

A formalistic approach to citizen engagement is holding back participation and accountability

Problem Statement

Burgas is a study in contrasts. It displays high sensitivity to citizen needs and, at the same time, a limited ability to proactively involve citizens in municipal decision-making. Furthermore, the recognition of Burgas's transparency does not account for its difficulties in engaging citizens in the policymaking process. All stakeholders agreed that local leaders are responsive and attentive, ready to address everyday problems quickly and decisively—this is part of what makes Burgas a municipality where people enjoy living. However, according to interviewees, an expectation that the government will take care of things has instilled a certain passivity in residents, who by and large do not take advantage of participatory opportunities; this, in turn, can sap the motivation of local leaders, who can become dismissive of their own voters. Absent more proactive engagement strategies, this negative feedback loop will lower the prospects of citizens holding their leaders accountable, therefore removing a critical mechanism for preventing corruption.

Findings: Key Strengths

1. **Over the years, multiple channels have been made available for citizens to make themselves heard.** The administration holds public consultations on the budget and other important topics. Council sessions are open to citizens. In 2019, Burgas developed a new strategy for citizen engagement as part of a good governance program with fellow municipalities Sliven, Yambol, and Stara Zagora. A large online survey was deployed prior to public consultations on the development of the Municipal Plan for Integrated Development 2021-27. A pilot initiative called "My town, my quarter, my street" funds small citizen-requested projects.
2. **Municipal leaders acknowledge the need to bolster citizen engagement.** Public officials expressed a clear commitment to encouraging citizen engagement and a willingness to try new approaches and methodologies. In general, municipal leaders acknowledge the challenge, recognize that trust will play a big part in addressing it, and

welcome ideas and suggestions on how to improve participation.

3. **The municipality works well with civil society organizations.** In 2008, the municipality signed an agreement with local NGOs and accepted their mandatory inclusion in several issue areas that go beyond what is required by law. More recently, a Facebook group was set up as a direct channel for communication with organizations who want to work with the municipality. NGOs providing services and those receiving municipal subsidies are in constant communication with relevant officials. And there is a good relationship with sports and local business associations. Inputs from NGOs and the business community are often channeled through various consultative councils and working groups.

Findings: Key Vulnerabilities

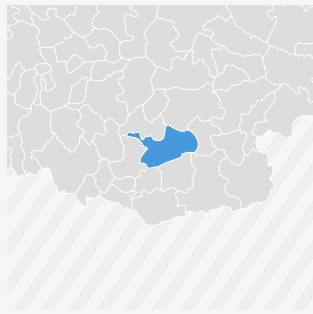
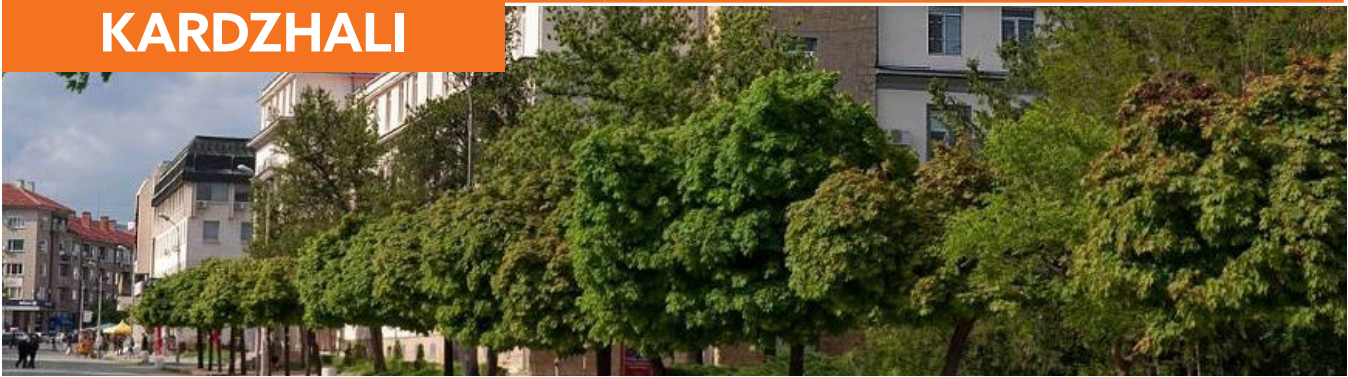
1. **Public consultations can be too formalistic, predisposing citizens and NGOs to be passive.** Some interviewees reported a one-way approach to municipal communication, whereby the municipality presents information in public consultations and discussions but does not always take citizens' feedback into account in the policymaking process. Relevant materials for consultations are not always understandable or made available in advance. Over time, citizens have opted to disengage out of the belief that their participation does not have any impact, some interviewees said. This has made consultations formalistic and sterile—a participatory tool that does not actually generate participation. Instead, people are more likely to try to appeal to the mayor directly, bypassing formal consultative avenues.
2. **NGO engagement in municipal policy discussions is inconsistent.** A constant theme among some interviewees was the lack of a consistent and coherent municipal approach to working with local organizations, with a perception that some civil society partners are privileged over others. In turn, other interviewees expressed negative views

of NGOs they claimed only exist to absorb funding opportunities, sometimes referred to as “professional” NGOs, and accused other NGOs not working with the municipality as having partisan motives. This has contributed to a climate of distrust and suspicions that those organizations that do not enjoy a good relationship with the government are excluded from making contributions to substantive discussions or from securing municipal funding.

Recommendations

1. **Municipal councilors should play a more active role in engaging citizens and encouraging participation.** The council can work closely with the media to ensure that citizens understand how decision-making processes work, how municipal policies will impact their lives, and what opportunities they have for shaping them. In this task, they should be able to rely on their good relationships with local media outlets: such a partnership between public officials and journalists would contribute to enhancing citizens’ ability to understand their government and, over time, strengthen their willingness to participate.
2. **Make public consultations more engaging and impactful.** The substance and format of public consultations should be made public in advance and with a basic explanation of the process, as well as links to all supporting documentation. Citizens would be more likely to attend if they knew the specific questions for discussions, whether they would have an opportunity to make contributions, and what the follow-up to their proposals would be—the effectiveness of this approach is evident in the success of consultations around the development of the Municipal Plan for Integrated Development. The development and adoption of a municipal ordinance or “manual” on public consultations would go a long way toward clarifying these requirements for municipal officials, who may otherwise be unfamiliar with outreach.
3. **Develop a comprehensive long-term strategy for engaging with NGOs, citizen groups, and youth.** There is room to make citizen engagement more meaningful in the Burgas municipality, by learning from the sectors where collaboration works very well (like social affairs, sports, and tourism), and using those lessons to draft a strategic approach to working with civil society stakeholders across the board. This may include broadening the reach of existing councils and working groups that bring together relevant municipal officials and council members with NGOs, businesses, and interested citizens into new areas. Permanent, inclusive, and impactful consultative bodies would gradually generate trust with citizens and build participation “muscle.” Clear and consistent rules for municipal funding of local associations can also foster a more engaged civic space. Finally, reaching out to younger citizens can inject much-needed fresh ideas into participatory approaches.

KARDZHALI



MUNICIPAL PROFILE

MAYOR	Hasan Azis
GEOGRAPHIC COMPOSITION	Includes the town of Kardzhali and 118 settlements over 574 square kilometers
POPULATION	67,000
PRIMARY ECONOMIC SECTORS	Agriculture and trade
OTHER	Highest proportion of ethnic Turkish citizens in Bulgaria

Findings and Recommendations

Efforts to enhance transparency have not dispelled citizen suspicions of corruption

Problem Statement

The Kardzhali municipality has taken significant steps to ensure compliance with legal transparency requirements, and yet interviews revealed a feeling among citizens that something remains hidden from the public eye. This perception feeds concerns about nepotism and corruption even in the absence of solid evidence. It also undermines existing efforts to enhance openness and accountability, as citizens are less likely to seek information from a municipality that they do not trust.

Findings: Key Strengths

1. **The municipality is committed to transparency.** The municipal website contains relevant information on senior administration officials and council members, announcements of upcoming

events and discussions, as well as relevant documentation on key decisions and procedures. The website also hosts conflict-of-interest declarations from public officials. Council sessions are broadcast online for citizens to follow. And the municipality communicates with citizens via Facebook, aiming to respond swiftly to problems posted there.

2. **There are mechanisms in place to ensure sound public management.** The municipality has been certified for its quality management system (ISO 9001) by the Bulgarian accreditation agency MG Global, and the mayor has signed guidelines pertaining to the quality of administrative services, which includes anti-corruption and transparency as priorities. According to interviewees, e-services have expanded and are reported to be in good shape. In order to prevent corruption, the administration follows strict public procurement procedures, has a conflict-of-interest committee and an internal audit unit, which periodically reports to the mayor on breaches of regulation. The municipal administration also has a financial

control system for any expenditure over 1000 leva.²⁸

Findings: Key Vulnerabilities

1. **Transparency is incomplete.** Some interviewees questioned the municipal website's user-friendliness, with some information difficult to find, not kept up to date, or even not available in some cases. Some of the documents uploaded to the website are drafts that are changed with little notice. There are no minutes of public discussions, and announcements for online broadcasts of council sessions sometimes come too late. There was concern about asking the administration for information beyond what it publishes itself: reportedly the mayor does not offer regular briefings for local journalists, and some queries for information go unanswered, making oversight harder. While citizens can use the access to information procedure for submitting requests, Kardzhali ranks low on the Access to Information Program's index.
2. **There are persistent concerns about public procurement.** A lack of sufficiently accessible information on public procurement, particularly for implementation and control over construction projects, feeds perceptions of opacity and suspicions of corruption. Interviewees argued the municipal government often publishes no information on the execution of public contracts or on contract budget increases after awards, until national authorities sanction the municipality for irregularities. The lack of publicly announced and clear information on public procurement awards and contract implementation gives rise to citizen suspicions that companies linked to the ruling party are awarded most contracts after objective technical requirements are tailor-made for them or specifications are changed after an award is made.
3. **Formal mechanisms for reporting citizen concerns are insufficiently responsive.** The

municipality has a hotline, a contact form, and email for posting signals, but these channels are reportedly not responsive enough. There used to be an ombudsman serving as an intermediary, as in other municipalities, but the institution was eventually discontinued for financial reasons. As a result, citizens take their concerns directly to councilors or try to get the municipality's attention on social media. This limits citizens' ability to keep signals confidential and increases the perceived cost of reporting instances of potential corruption.

Recommendations

1. **Continue to improve the municipal website to make it more user-friendly.** It should be easy for the municipality to build on existing efforts on the website and e-services by increasing the quantity and accessibility of the information available to citizens. This should be based on a survey to identify what additional information citizens would like to see. The updated site should include a section on access to information, with an up-to-date list of requests and responses in order to bolster transparency but also to minimize the chances of duplicated or repeated requests.
2. **Expand publicly available online information on public procurement and hiring.** Concerns about public management can be addressed by publishing comprehensive information about basic administrative processes. This can include a register of past, ongoing, and announced public procurement tenders, including the implementation phases of signed contracts, with basic information and links to full documents. Such information would increase citizens' ability to follow the spending and investment process. Likewise, all steps within a hiring process (applications, review criteria, selected candidates) can be publicized in greater detail in one designated and visible place on the website, with documents organized by each step of the process, to dispel concerns about nepotism.

²⁸ The leva is Bulgaria's national currency, roughly equivalent to 0.56USD.

In collaboration with civil society, public monitoring councils could be set up to monitor implementation of select policies and projects.

3. **Develop a municipal platform for signals.** Citizen experiences around corruption can be improved via a unified platform for signals that creates a tracking number and forwards them on to the relevant administrative department. This would include a digital platform but would also require designating a municipal contact point for citizens' signals and feedback. Once adopted, a functioning platform could create a register for signals to allow traceability and improve accountability. It would also allow for municipal reports on responses and actions taken on a regular basis.
4. **Establish an intermediary function between citizens and the municipality.** The perceived distance between citizens and their municipal government can be bridged by establishing intermediary agents who can aggregate and relay citizen concerns on the one hand and monitor administration reaction on the other. NGOs or the "Kardzhali for you" platform (further described below) can serve as intermediaries for government consultations with citizens, while the municipal website for signals (outlined in the third recommendation above) can relay citizen complaints and reports of irregularities.

The municipality's approach to engagement has not translated into citizen participation

Problem Statement

Kardzhali citizens are more likely to engage with municipal issues on social media than through official channels made available to them by the municipality. This challenge is openly acknowledged by all stakeholders, and recent innovations (like an online consultative portal) are proof of steps being taken to address it. Citizen

disengagement is a vicious circle that can lead to local leaders becoming discouraged and citizens distrustful—in the long run, non-participation makes accountability virtually impossible.

Findings: Key Strength

1. **The municipality has an explicit desire to bolster participation.** The municipality carries out consultations on many topics, including whenever policies change, or a new initiative is developed. Announcements are posted on the website and, after a one-month period for citizen input, a public discussion is held. An ordinance on public consultations was adopted to strengthen the process and, on the initiative of the national NGO Forum for Civic Participation, a new "Kardzhali for you" digital platform was developed.²⁹ The municipality plans to popularize the platform to drive citizen engagement. Council sessions are open to the public. Above all, municipal leadership and the administration acknowledge that participation is a challenge and would like citizens to help them identify local problems and budget priorities.
2. **There has been collaboration with some issue-based NGOs.** Under the municipal council there are various sectoral consultative councils in which NGOs are invited to join, for example on youth affairs, culture, and tourism. According to interviewees, NGOs have been able to influence concrete municipal decisions related to education, infrastructure, and culture. In such cases, they raised public awareness and made the municipality understand why these were important issues, acting as a kind of bridge between citizens and the administration.

Findings: Key Vulnerabilities

1. **There is a lack of citizen engagement with official participatory mechanisms.** Public consultations are carried out in compliance with legal requirements, but they reportedly focus more on procedure than substance. In addition, public discussions

²⁹ "Kardzhali for you" is based on the CONSUL open-source citizen participation tool, which is used by many municipalities worldwide: <https://consulproject.org/en/>. The tool has functionality for debates, proposals, participatory budgeting, voting, and collaborative legislation.

do not attract citizen participation: usually those in attendance are members of the administration or the council, with maybe a couple of citizens in attendance. Interviewees argued that often citizens do not participate or provide feedback due to a lack of awareness about the proper channels for interaction (the “Kardzhali for you” platform does not yet appear to be well known), or due to a belief in the lack of impact of such channels. Council sessions are open to the public, but citizens generally do not attend unless councilors proactively reach out to them, or when personally invited. The shift to an online format under COVID-19 has worsened an already lackluster pattern of civic engagement.

2. **There is inconsistent engagement with the civic sector.** Despite some positive examples of NGOs collaborating with the administration and even shaping municipal decisions, these appear not to be part of a systematic and consistent approach to civic engagement. There is no structured, sustainable, and inclusive mechanism for engagement between NGOs and local government, which generally leaves some NGOs out of expert discussion and municipal decision-making. This weakness is compounded by the dearth of civil society groups and organizations—in general, Kardzhali citizens prefer to express their dissatisfaction on social media rather than organize and mobilize in person.

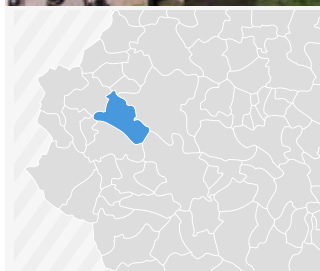
Recommendations

1. **Educate citizens about participatory opportunities and the process for impacting decisions.** The municipality should launch information campaigns for citizens on how to participate in council meetings and public discussions and consultations, including how these sessions work, what inputs are valuable, how the leaders take citizen proposals into account. The municipality can work with local media by holding press conferences and social media via Facebook and other platforms to explain the process of citizen influence through participation, and to document instances when citizen inputs have

shaped municipal policy. It will be important to reach out to young people specifically through a municipal government open-doors day for youth or periodic youth meetings with the mayor.

2. **Emphasize the use of digital platforms.** The “Kardzhali for you” platform can be strengthened by promoting it more actively among the local community as the municipality has already planned, but also by uploading all documents pertaining to public consultations, both past and upcoming, with a focus on showing what participatory impact looks like and increasing citizen ability to understand the process. As a general rule, the municipality should widely publish information on future opportunities for participation—such as public consultations, council sessions, consultative groups—well in advance, making them visible on the website, through local media, and on Facebook.
3. **Establish issue-specific consultative councils or working groups with relevant stakeholders.** The municipality should streamline the process of identifying and inviting relevant stakeholders when debating new sector initiatives and plans, such as by launching an online process of self-registration for NGOs working on each sector with the goal of compiling comprehensive stakeholder lists. Consultative councils and working groups can serve as informal think tanks for the municipality, while bolstering participation and demonstrating practical accountability. Above all, a more consistent approach to engagement with NGOs would improve perceptions of openness and participation, breaking the vicious circle of civic disengagement.

PERNIK



MUNICIPAL PROFILE

MAYOR	Stanislav Vladimirov
GEOGRAPHIC COMPOSITION	Includes the towns of Pernik and Batanovtsi and 22 villages over 477 square kilometers
POPULATION	100,000
PRIMARY ECONOMIC SECTORS	Manufacturing and energy

Pernik is one of ten municipalities selected for IRI's VCA process in Bulgaria. It is situated in the west of the country and encompasses the eponymous main town, as well the town of Batanovtsi and 22 villages spread out over 477 square kilometers, with a total population of around 100,000 people. The city of Pernik is a major industrial center, with manufacturing and energy providing a sizeable portion of local employment; however, the city has also made national headlines over the years due to its struggles with pollution and air quality. It is the second largest city in western Bulgaria behind the capital, Sofia, which is 30 kilometers away; proximity to Sofia has advantages, but also disadvantages, like challenges in retaining professionals to work in the local administration when they can instead opt for higher-paying jobs in the capital.

Findings and Recommendations

Deficits in municipal government transparency contribute to suspicions of corruption

Problem Statement

Pernik municipality has witnessed many improvements around openness and transparency in the last few years, particularly when compared to past practice. However, there is still much progress to be made in order to dispel long-standing citizen concerns about influence peddling and corruption in key sectors of the municipal economy, and disinformation will not be dispelled so long as the documentation and explanation of decisions and their impacts remain incomplete. Transparency is not just about publishing information required by law, but about helping citizens understand how their government works and why decisions are made.

Findings: Key Strength

1. **Pernik's leaders have gradually opened the municipality in recent years.** There was agreement among interviewees that the state of municipal transparency has improved considerably, relative to previous administrations. The municipal website has been updated and includes information on major decisions and announcements. Social media primarily Facebook, are proactively used as channels for disseminating relevant information. Public procurement and recruitment have moved entirely online. The administration responds quickly to access to

information requests. And council sessions are streamed online and broadcast on local TV.

Findings: Key Vulnerabilities

1. **The website does not have enough information to track key sector issues and trajectories.** Some interviewees considered publicly available information on public procurement to be insufficient or unintelligible. They also reported concerns about opacity around key decisions on expenditures. While the municipal website covers current affairs, it does not include a searchable archive of municipal tenders where citizens can follow up on individual contracts. In addition, there is much more information available online for the administration than for the council, and broadcast sessions of the council are not archived.
2. **It is not always clear for citizens how decisions are made.** Some interviewees pointed to a lack of sufficient transparency about the criteria and consultations supporting certain policy choices, particularly around sensitive issues like pollution and air quality. This has led some to believe that economic interests may have an undue impact on how pollution is handled. And despite the public availability of some technical information, for instance regarding public procurement, few citizens have the background or skills required to process and analyze such information. The lack of an easily understandable presentation of publicly available technical documentation therefore limits public interest. Unannounced significant changes to some infrastructure projects—after public consultations—diminish the perceived impact of civil participation in consultation procedures.

Recommendations

1. **Update the municipal website from a user experience perspective.** The structure and presentation of the website itself can be revised with an eye towards user friendliness, focusing not on what the administration publishes but on the services

and information that matter most to citizens. This would include a stronger focus on key administrative procedures, with clear deadlines and requirements, as well as an online publication of relevant public registers where citizens can track contracts, grants, use of municipal properties, etc. Clustered information on policy issues and sectors important for citizens should also be easy to find, particularly when they are relevant to upcoming public discussions.

2. **Work with intermediaries who can “translate” and explain municipal policies and actions to citizens.** The publication of information on the website does not necessarily increase citizen awareness and understanding if such information is too technical or presented in an inaccessible manner. Municipal officials can work with the media and other community voices to ensure that citizens understand how decision-making processes work, how decisions will impact their lives, and what opportunities they have for shaping them. This can include activities such as presenting to citizens which departments are responsible for which functions or explaining the budget cycle in a more accessible manner. Follow-up on projects with public information and explanation in case of necessary changes in the implementation phase will reduce the perception of lack of citizen impact on decisions.

Existing communication channels between citizens and the municipality are insufficiently clear and efficient

Problem Statement

Despite efforts to bring the municipality closer to citizens, both in terms of public relations and of administrative processes, there remains a widespread perception that the administration is still too cumbersome, and that the only way to solve a problem is by attracting the mayor's attention through personal contact, the media, or social media. While this proves a belief in the idea that local government can address

citizen concerns, the use of informal and indirect channels is a recipe for inefficient and selective accountability that can easily be exploited by economic interests.

Findings: Key Strengths

1. **The mayor's team is committed to reaching out to citizens.** There is a younger executive team in office, which has bolstered efforts to make the mayor visible to citizens, including, for example, working with public relations experts and reaching out through social media. There is pride in the administration about recent awards received by the mayor, such as "Mayor of the Year" in 2020 and "Mayor of the Citizens" in 2021. The municipality expresses a commitment to not only listening, but also reacting to what citizens say.
2. **There has been some progress in e-government.** After some significant investments, ten e-services are now provided for citizens. A new system which allows citizens to book appointments with the administration online has reduced waiting times. On the council side, for the first time, contact emails for council members were recently posted for citizens to see.

Findings: Key Vulnerabilities

1. **Citizens often do not know who to turn to, or they make use of unofficial channels.** Interviewees shared that, when citizens have an issue, they are not likely to make use of official channels of communication—instead, they either post complaints on Facebook, or call the local TV station "Krakra TV," which has come to play the role of "emergency hotline" for the municipality in the last 20 years. While useful, these channels are neither formal nor subject to clear rules and traceability. One of the likely causes for their preeminence is the limited visibility of the council among citizens, who may often not know what it does nor how it can assist them in addressing their concerns. For example, for years no councilor has attended the Consultative Council on Youth Policies with the mayor. Another cause is the limited citizen awareness of the official channels that

can be used, how they function, and what advantages they offer compared to informal channels.

2. **There is a belief among citizens that the mayor is the only valuable point of contact.** Interviewees reported that, with insufficient knowledge about the administration and possible points of contact, citizens have come to expect that only the mayor can help them solve their problems. There have been attempts to address this, primarily by introducing public relations officers, with little success. This focus on a single public official is inefficient, risks overwhelming the mayor's office with myriad small demands, and creates a vulnerability for possible corrupt behavior by malicious actors.
3. **The administration is still largely paper-based.** Despite investments in e-services and e-government training, there has not been a substantial change in how the administration conducts its affairs. Many of the e-services offered are not truly electronic, in fact, there is a common practice of printing emails and requests on paper and handing them off by hand to the relevant department. Interviewees also relayed citizen concerns about the administration being too slow to respond.

Recommendations

1. **Enhance the constituency support function of the municipal council.** Part of the reason why citizens appear to direct their attention to the mayor is the municipal council's lack of proactive and ongoing engagement with citizens. In addition to performing their legislative and oversight functions, council members should try to be more open and receptive to citizens, explaining to them what councilors do and how they can be of assistance in solving problems or forwarding queries to the administration. This would both strengthen the council's legitimacy and counter the perception that everything in the municipality centers on the mayor.
2. **Establish clear points of contact for the sectors and services most important to the public.** It would be important to ensure

that these are easy to access and are responsive. Government accountability can be strengthened by recording the number of cases addressed and the most common issues and then publishing these findings on the government website each month. Contact information on these sectoral points of contact can be announced in local media and should be highly visible on the municipal website.

3. **Consolidate e-government services and platforms.** More attention should be paid to how the front end (user experience) and back end (administrative process) of e-government works, to ensure citizens are presented with easy-to-use functionalities for submitting applications and requests, tracking their status, and making inquiries. Even before additional e-services are added, this would include building the administration's capacity to process requests and provide customer support, as well as educating citizens about the platforms and procedures available to them.

The municipality's engagement approach has not led to greater citizen participation

Problem Statement

Pernik citizens often find their municipal government distant and disengaged, a perception that discourages participation. This stems partly from a lack of official platforms where citizens can both express themselves and feel heard, and partly from a historical trajectory of civic disillusionment that is hard to overcome with formal participation mechanisms. The result is a spiral of disengagement and distrust that further widens the gap between public officials and the citizens they serve, and ultimately weakens accountability for municipal policy and management.

Findings: Key Strengths

1. **The municipality holds public consultations on major issues beyond legal requirements.** In general, all major financial investments are presented to the public for debate—

the adoption of “green” buses, renovation plans for public buildings, energy efficiency measures, etc. Citizens are also invited to submit their own proposals, which can end up influencing municipal policy. Interviewees cited the example of the 2020 draft budget, where public discussion and citizens’ suggestions led to alteration of the initial text proposed by the mayor.

2. **There is good communication between the municipality and certain sectors.** Unlike under previous administrations, formal structures have been adopted for ongoing communication with key stakeholders in certain sectors. The social sector has a consultative council and working groups where relevant officials and civil society can discuss policies and long-term strategies. This translates into a feeling among social NGOs of being heard. Similarly, interviewees reported open, consistent, and engaged communication between the municipality and businesses, including a tri-partite council for cooperation between employers, workers’ associations, and local government. A Consultative Council on Youth with the mayor has been set in operation. Overall, interviewees agreed that communication with local associations has significantly improved under the current administration.
3. **There have been recent examples of decisive municipal action in response to citizen concerns.** Interviewees repeatedly applauded the municipality’s swift and effective response to the proliferation of stray dogs. An expert organization was brought in to support municipal efforts, leading both to tangible results that improved everyday lives, and to widespread familiarity among citizens with the solution provided by the municipality. This was a prime example of the administration’s stated desire to listen and react to what citizens say, but also proof of the impact of citizen input and buy-in over successful implementation of a project. It is a good example of a joint effort by the administration and civil society to solve a well-known community problem.

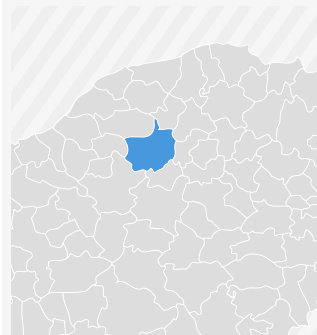
Findings: Key Vulnerabilities

1. **Public consultations focus on strategic issues that are not engaging for citizens.** In contrast to the kind of heightened citizen engagement in ad hoc issues like the stray dog problem, regular consultations as required by law rarely attract citizen attention and participation. Interviewees shared some possible reasons for this relative failure of citizen engagement, for instance, the subject matter focusing too much on strategic issues and documents, as opposed to everyday concerns, while at the same time failing to show the link between the former and the latter. There is also a sense among citizens, reportedly, that their engagement in such events does not yield a tangible impact, and that they are invited purely as listeners.
2. **There is no mechanism for structured and cross-cutting dialogue with civil society on policy issues.** In contrast to the good practice seen in the social sector and with businesses, there is no mechanism for structured engagement with civil society at large. Citizens often believe that the only way they can be heard is by forming NGOs to pressure the government from the outside. Interviewees cited the positive example of a proposed municipal investment being canceled after a public petition received considerable support, but the example illustrates reaction after the fact, instead of inclusion from the start of the planning process.
3. **Municipal responses to citizen concerns appear to be inconsistent and selective.** For some interviewees, the swift and effective reaction to the stray dog issue stands in marked contrast with the municipality's struggle to tackle long-standing challenges around pollution and air quality. A lack of consistency in attention and effort generates disillusionment and distrust among citizens, which is a contributing factor to their disengagement from public debate. Even when a certain issue is not within the jurisdiction of the municipality to solve, the local government should still explain such constraints and how it is relaying the problem to the decision-makers at the relevant level.

Recommendations

1. **Adopt a new approach to public consultations that emphasizes dialogue and follow-up.** The substance and format of public consultations should be made public well in advance and with a basic explanation of process, as well as links to all relevant supporting documentation. Citizens would be more likely to attend if they knew the specific topics for discussions, whether they would have an opportunity to make contributions, and what the follow-up to their proposals would be. The development and adoption of a municipal ordinance and "manual" on public consultations would go a long way toward reassuring citizens that their voices will be heard and clarifying these requirements for municipal officials who may otherwise be unfamiliar with outreach.
2. **Develop a comprehensive long-term strategy for engaging with NGOs and citizen groups.** There is room to make citizen engagement more structured and impactful in the Pernik municipality by learning from the sectors where collaboration works well (like social affairs, youth, and business) and using these lessons to draft a strategic approach to working collaboratively with civil society stakeholders across the board. The municipality can use existing mechanisms as templates for other sectors. Permanent, inclusive, and impactful consultative bodies would gradually generate trust with citizens, as well as build participation "muscle."
3. **Explore the possibility of adopting an open-source digital platform for citizen opinion and participation.** Interviewees repeatedly suggested that the municipality should be able to hear from citizens on a regular basis and with a greater level of detail. Online surveys could be conducted to identify citizen priorities and concerns; they could also be used to give citizens an opportunity to periodically rate services and performance. These types of efforts could be merged and streamlined by adopting an open-source digital platform for engagement like other Bulgarian municipalities are doing.

RAZGRAD



MUNICIPAL PROFILE

MAYOR	Dencho Boyadzhiev
GEOGRAPHIC COMPOSITION	Includes the town of Razgrad and 21 villages over 620 square kilometers
POPULATION	50,000
PRIMARY ECONOMIC SECTORS	Light manufacturing and agriculture
OTHER	Second highest proportion of ethnic Turkish citizens in the country

Findings and Recommendations

Transparency gaps in public management feed suspicions of corruption and nepotism

Problem Statement

Despite increased transparency efforts and the presence of corruption prevention rules and procedures, there are persistent concerns about hidden corruption among the citizens of Razgrad. Speculative and unfounded suspicions are often bolstered by critical gaps in public information about how decisions are made or how oversight unfolds. Absent corrective measures, citizens will grow increasingly distrustful about the municipality, further aggravating civic disengagement.

Findings: Key Strengths

1. **There have been significant improvements in transparency in recent years.** Interviewees generally agree on a marked improvement in recent years in the Razgrad municipality. Many key documents are published on

the municipal website, including the mayor's governing agenda, as well as plans and reports on the council's activities. Information not already available can be procured through access to information requests, of which there has been visible progress in recent years.

2. **There are mechanisms for preventing corruption.** All checks and rules required by law apply to the municipality's public expenditures. Rules for public tenders are clear and transparent, there is a conflict-of-interest committee, and there are processes for internal audits that supplement the monitoring and audit requirements of national and EU-funded programs. On top of that, administration staff is required to follow a code of conduct. In combination, according to some interviewees, these mechanisms make corruption highly unlikely.

Findings: Key Vulnerabilities

1. **Public information is sometimes incomplete or not timely.** Some interviewees pointed to gaps in the information provided by the municipality. Citizens cannot easily access procurement information about bids or follow implementation of public

projects after contract awards. Likewise, comprehensive and structured information on individual hiring decisions is not consolidated in one place. In some cases, documents are not updated after policies change, or announcements are not made in a timely fashion. Interviewees argued that the municipal website is not well designed when it comes to providing information or following up on signals. That applies even to positive developments, which the municipality does not do enough to publicize. This leads to access to information requests that ask for information that is already publicly available, and even the duplication of requests.

2. **There is a perception among citizens that corruption is behind the scenes.** All interviewees alluded to suspicions of corruption and a lack of trust, saying these concerns are held by a sizeable portion of citizens. Commonly held perceptions include seeing infrastructure and renovation projects as an opportunity for enrichment, suspecting that contracts are awarded based on political contacts, and a sense that competitions for construction projects are undermined by collusion. In general, citizens do not have sufficient information to know whether underperforming projects stem from mismanagement or corruption and believe that the council does not have effective control over the administration. Some believe that the access to information process produces incomplete or misleading information, fueling rather than alleviating suspicions of wrongdoing. Regardless, they default to suspecting corruption.

Recommendations

1. **Expand and structure public procurement, hiring, and oversight information on the municipal website.** Concerns about public management can be addressed by generating and publishing comprehensive information about basic administrative processes. In addition to the already available, but hard for citizens to navigate “profile of the client” section on the website, this can include a searchable log of past,

ongoing, and announced public procurement procedures with basic information and links to full documents. This would increase citizens’ ability to follow the spending and procurement process. Likewise, all steps within a hiring process (applications, review criteria, selected candidate) that the municipality already uploads could be put, in a well-structured way, in one place on the website, complete with documents pertaining to the different stages of a particular recruitment process shown together to dispel concerns about nepotism. These documents on hiring procedures can be kept online for one or two years, or if possible, for the entirety of an incumbent mayor’s term.

2. **Explore the potential for creating a civic monitoring mechanism.** As a complement to comprehensive releases of information, the municipality could invite local NGOs to observe decision-making in public procurement and implementation, thereby providing civic monitoring and transparency. If NGOs report on their experiences and findings independently and publicly, citizens will see that the municipality has nothing to hide.
3. **Create a register of access to information requests.** It is good practice to create and publish a searchable register of access-to-information requests and subsequent responses by the administration. Such a register would have multiple benefits: it can better convey to citizens how transparent the process actually is; it can prevent duplication of requests and therefore contribute to a more efficient system; and it can deter or provide grounds for dismissal of malicious requests intended to overwhelm the administration.

Perceptions of the municipality as distant and unresponsive drive citizens toward informal accountability mechanisms

Problem Statement

Some Razgrad citizens perceive the municipality as inaccessible and hard to engage. Others become disappointed when the municipality does not meet their expectations, even though they do not necessarily understand its financial constraints or administrative requirements. This perceived distance between government and citizens undermines official accountability tools and incentivizes citizens to leverage personal contacts to solve their problems. An overreliance on informal and personal connections is a typical vulnerability to corruption.

Findings: Key Strength

1. **The municipal government has multiple channels for communication with citizens.** Interviewees agreed on a positive trend toward increasing communication and visibility by municipal leaders in recent years. Both the mayor and deputy mayors have active Facebook presences. Beyond social media, the municipality reaches out to citizens via its website and local radio, a front office has been established for queries and concerns, and citizens can use a hotline number for signals. Likewise, council sessions are streamed live online and on local TV, and highlights are published in local newspapers. There are channels for citizens to make suggestions during reception days, and council members can be contacted directly.

Findings: Key Vulnerabilities

1. **Existing constituency engagement tools are insufficient.** Interviews were inconsistent on the efficacy of using email and telephone numbers from the website to contact senior officials. Even with contact information available, interviewees said they felt a lack of a genuine connection between officials and citizens. Contact information for individual municipal councilors is not published. Citizens often complain that it is difficult to receive feedback from the municipality and the council. Interviewees agree that this is probably due to COVID-related restrictions, which have limited availability; however, municipal leaders have not planned any

activities that would presage a return to pre-COVID communication in a structured and predictable manner.

2. **Citizens believe that informal channels are more useful than formal ones.** Interviewees repeatedly stated that signals posted through official channels are frequently not traceable and often receive no response; sometimes they disappear. This is in stark contrast to non-official channels, like Facebook, where the municipality regularly addresses complaints. Because of this perceived failure of official channels, interviewees argued that citizens will often try to appeal directly to a personal contact—a councilor, the deputy mayor, or the mayor himself—when they want the municipality to address an issue. In general, there is a belief that things will go faster when high-level buy-in can be secured.

Recommendations

1. **Consolidate a municipal platform for reporting complaints and requests.** Citizens' negative experiences sending complaints and requests to the municipality can be remedied by adopting a unified platform for signals. This system could be designed to create a tracking number and forward communications to the relevant unit; if possible, the use of a digital platform should be supplemented by a municipal official tasked with monitoring complaints, requests, and feedback. Such an approach would allow traceability, enhance accountability, and allow for municipal reporting on responses and actions taken.
2. **Establish an office of ombudsman or a similar intermediary agent.** The perceived distance between citizens and their municipal government can be bridged via intermediary agents. An ombudsman could aggregate and relay citizen concerns and track administration reaction. An ombudsman-type figure would serve as a familiar channel of communication and feedback; as this office is non-partisan, it would give citizens the sense that someone is listening to them, no matter what.

3. **Launch an outreach and trust-building campaign.** Given low trust levels among citizens, the municipality should initiate a long-term trust-building campaign across all towns and villages that provides an opportunity for citizens to discuss issues of concern. This could also be a chance for the municipality to publicize its actions and decisions, and explain how citizens can request administrative services and contact the administration and council. Both institutions, the municipal administration and the council, should be part of the campaign. This should be supplemented with additional outreach, such as inviting citizens (and particularly youth) to open house days in order to improve perceptions of accessibility. Other outreach could focus on information sharing about how official communication channels work. Establishing a clear and predictable system of rules on reception days would also enhance citizen trust.

Lack of familiarity with civic engagement opportunities and visibility of their impact lowers citizen participation

Problem Statement

Apart from a few citizens who are politically active, a limited number of people in the Razgrad municipality bother to follow the work of local government, much less participate in it. In general, people do not consider it their responsibility to carry out government oversight—they either accept what municipal leaders do, or simply voice their discontent on social media. This vicious circle of non-participation hinders effective accountability.

Findings: Key Strengths

1. **There is agreement from municipal leadership on the need to bolster civic engagement.** All interviewees, including those from both government and civil society, agreed on the challenge of low citizen interest and participation in municipal decision-making in Razgrad. Public interest is low, and this is seen as something

that leaders must address. Indeed, the municipality often proactively tries to reach out to citizens.

2. **There have been significant improvements in participatory outreach.** There was a sense among interviewees that it is much easier to collaborate with the current administration than with previous ones. Beyond the legal requirement of holding public consultations on the budget and other key decisions, the municipality is trying to appeal to citizens by discussing a broad range of topics, after business hours and in venues outside the municipal building. The council also takes public concerns into account when setting its agenda. The environment and urban planning are among the topics that tend to attract the most public attention, and some interviewees noted instances where citizens' views have shaped administration and council decisions.
3. **There is some engagement between the municipality and the civic sector.** According to interviewees, the administration works very well with certain issue-based NGOs, as well as with business interest groups. The municipality and these groups work on joint projects and discuss strategic issues in council sessions or on consultative councils, like the one on social affairs. For its part, the NGO sector is described as proactive and regularly communicates its positions to municipal leaders through various channels.

Findings: Key Vulnerabilities

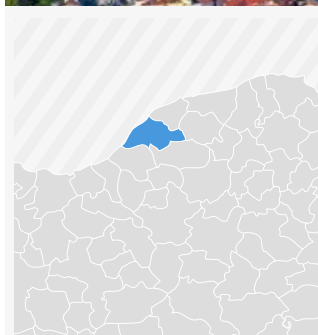
1. **Citizens are not aware of some of the participatory opportunities available to them.** Only a small portion of Razgrad citizens is familiar with the opportunities for communication, participation, and impact available to them, whether through public consultations or municipal council sessions. Interviewees point at insufficient information on public consultations and discussions, or a lack of timely publication of council agendas as potential causes for limited citizen engagement.

2. **Formal consultative channels are not seen by citizens as impactful.** After a period of improvement, civic participation in Razgrad is said to have reached a plateau, with only a few citizens in attendance at public discussions and council sessions. It is also hard for citizens to participate during online council meetings, as they do not have an opportunity to interact. There is concern about consultations being too formalistic, too limited in scope, or not involving critical stakeholders such as sector associations. This has led citizens to believe that they simply cannot have an impact on municipal decisions.
3. **There is little substantive collaboration between the municipality and NGOs.** Despite occasional engagement, concerns were raised about platforms for public input, such as consultative councils, serving primarily as rubber-stamps, asked to validate an existing proposal. These platforms should instead provide opportunities for input or shared strategic thinking. As reported, a relatively limited number of civic associations are invited to join such discussions, which creates a perception of a divide between the NGOs that are favored by the municipality and those that are not.
2. **Educate citizens about how they can engage.** The municipality should launch information campaigns on how to participate in council meetings and public consultations; how these sessions work, what inputs are valuable, and how citizen proposals are taken into account. The municipality can work with local media and through social media to explain the process of citizen participation. It can do a better job publicizing information on upcoming public discussions as a way to promote attendance. Strategic and governing documents and plans, such as the municipality's annual investment plan, should be highlighted on the municipality's website. There should be a dedicated effort to direct views voiced on social media toward municipal forums, inviting and encouraging citizens to participate in person.
3. **Establish sectoral working groups or consultative councils with relevant stakeholders.** The municipality should build a database and invite local NGOs to register and then use that information to identify and invite stakeholders to meetings about new ideas and plans. Consultative councils and working groups can serve as informal think-tanks for the municipality and bolster participation and demonstrate accountability. Above all, such engagement would improve perception of transparency and participation, breaking the vicious circle of civic disengagement.

Recommendations

1. **Make participation more interactive and impactful.** Public discussions and council sessions would be more participatory if citizens were given more information on discussion topics, more time to prepare for them, and a commitment that they will not only be able to voice concerns and questions but also receive answers from municipal and council representatives. In order to signal an increased interest in citizen input, the municipality should reform the procedures and rules for organizing public consultations and the council—the rules of procedure for holding its meetings, so as to make more time for citizens to speak. Citizen feedback should also be incorporated. The municipality could consider using digital platforms to modernize and streamline its communication outreach.

RUSE



MUNICIPAL PROFILE

MAYOR	Pencho Milkov
GEOGRAPHIC COMPOSITION	Includes the towns of Ruse and Marten and 12 villages over 469 square kilometers
POPULATION	145,000
PRIMARY ECONOMIC SECTORS	Transportation, industry and energy
OTHER	Known as "Little Vienna" for its cultural and architectural heritage

Findings and Recommendations

Inconsistent efforts at transparency and responsiveness hinder accountability

Problem Statement

Recent years have witnessed a significant improvement in transparency, openness, and responsiveness in the Ruse municipality. These efforts have been acknowledged and welcomed by all interviewees. However, there remain questions about the selective publication of information, as well as an occasionally one-sided communication approach. Citizens do not understand how the municipality works, which frequently leads to frustration, and they see it as a distant institution. This disconnect undermines ongoing transparency efforts and poses an obstacle to any attempt to build an accountability-based system for corruption prevention.

Findings: Key Strengths

1. **The administration has made transparency and openness a key priority.** There is an explicit commitment from a new administration that has tried different channels to make more information available to citizens. Most relevant documentation is available on the municipal website. This includes regulations, procedures, and decisions (interviewees indicated that public procurement has been more open in recent years), but also weekly activity reports prepared by the public relations department. This is supplemented with the use of other channels, like the local press and Facebook.
2. **The municipal website has emphasized citizen access to decision-makers.** Interviewees noted that the municipal website was revamped to unify systems for tracking signals, requests, and complaints. A button has been introduced for submitting written communications to the administration that includes a unique code for tracking the progress of a letter or signal. Another notable addition has been a list of contact information (phone numbers and emails) for high-level administration officials so that citizens and the media can get in direct contact with them.

Findings: Key Vulnerabilities

1. **There is limited information on the execution of public contracts and properties.** Despite improvements in transparency around public procurement, concerns were raised about key steps of the process such as the criteria used for assessing bids. Not all stages of procurement are equally publicized, and there is little information on past bids and contracts, which can only be accessed in person. Above all, it is hard for citizens outside the administration to find information regarding certain major works, including any checks and controls on implementation, deadlines, or warranty periods. The current level of transparency may ensure government accountability on awards, but not on execution. This is a clear vulnerability to corruption.
2. **The current communication approach can be unresponsive.** Despite the progress made in revamping the municipal e-platform, interviewees reported diverging experiences when trying to submit signals, complaints and reports. They sometimes experienced an inactive contact form, were given no tracking information, or received no response to their submissions. Even if the system functions flawlessly most of the time, and such occasions are the result of temporary technical glitches, leaving such problems unexplained undermines trust in municipal electronic communication tools and creates a perception among citizens that their communications with the municipality may be lost, or never responded to. There is an information center for citizens in the municipal building where they can request documents, but this must be done physically, and some interviewees indicated that such queries take a long time to be answered. Reportedly, it also takes time to schedule meetings with municipal representatives. While these weaknesses can be partly explained by understaffing in the administration, in combination they contribute to a perception of the municipality as distant.

Recommendations

1. **Expand the municipal website with indexed archives of relevant information.** The current platform can be used as a foundation to develop a more comprehensive and easy-to-use information portal. On this portal, citizens would be able to check registers of contracts, winning bidders, municipal properties (with geolocation), as well as records of implemented projects and sanctioned polluters. This is information that the municipality already has, and by putting it on the website the number of queries and access to information requests would likely decrease.
2. **Enhance existing communication tools and channels.** While interviewees recognized the value of weekly reports as an improvement relative to what was available during previous administrations, there was a question about the substance and relevance of some of the information they contain. Reports could be used to explain how the administration works, for example by presenting up-to-date information on the execution of existing municipal projects, including any changes relative to the original proposals. Supplementing the reports with a video presentation from the mayor or a press conference where local journalists can ask questions would enhance tangible accountability. Reports can also be done on a monthly, instead of a weekly, basis to avoid any burden an enhanced version might put on the administration.
3. **Reorient municipal public relations toward proactive engagement.** The mayor's team, with relevant administrative experts with a role in public relations and strategic communication, can set up a small brainstorming group that would focus on improving how proactive the local government is in addressing community concerns and providing the kind of information it demands. This group can also look inward, reminding municipal staff of their roles as public servants and building their capacity to engage with citizens. In parallel to this effort, the appointment of

an ombudsman can also help mediate the relationship between citizens and public officials.

Formal participation mechanisms do not enhance citizen engagement in municipal decision-making

Problem Statement

The citizens of Ruse are largely apathetic when it comes to engaging in municipal decision-making. This view was unanimously expressed by all interviewees. But this should not justify the lack of citizen participation, instead, it should be used as an opportunity for reflection on why existing participation opportunities are not prompting citizens to engage. The municipality should consider how to make public consultations more engaging and impactful and its collaboration with civil society more structured and sustainable. Absent this reflection, the vicious circle of disengagement will only continue, dissuading citizens from carrying out their decision-making and monitoring functions.

Findings: Key Strengths

1. **The municipality wants to engage in dialogue and partnership with citizens.** Municipal leaders expressed a firm belief that the municipality should work with and get feedback from citizens, NGOs, businesses, and unions. To this end, according to the interviews, multiple initiatives have been launched by the municipality in recent years: a public council on culture and an expert council on the environment that are reportedly very active; a quarterly youth commission that brings together representatives of all associations working with children in Ruse; and an *ad hoc* council committee on air quality, which led to the publication of an environmental cadaster (map) of polluters and emitted pollutants. Interviewees reported good working relationships between the municipality and NGOs working in culture and social services.

2. **The municipal council has established new mechanisms for participation.** In the present term, livestreaming of council and committee sessions has become standard practice. Press conferences are held on the eve of each council session to present the agenda and cover the issues, and press releases are forwarded to local media. The council has established a standing committee on relations with citizens, which is designed to be a bridge between civic associations and the administration. A citizens' initiative fund has also been launched; it funds small projects carried out by citizens and while it is not necessarily a tool for civic engagement, it has attracted many submissions.
3. **There have been impactful examples of citizen mobilization.** In recent years, there have been several instances of citizen protest and mobilization influencing decision-makers' choices. A popular Facebook group was established in the wake of protests about air quality, and over time it came to attract over 8000 members. Interviewees also reported citizen mobilization around a planned investment to develop a new foundry in an industrial zone. These instances show an underlying capacity for civic action in Ruse that can be channeled toward participatory mechanisms.

Findings: Key Vulnerabilities

1. **Public consultations are not seen as engaging nor impactful.** The municipality holds public consultations on the annual budget and major issues, as required by law. In some cases, as when dealing with environmental issues, these attract a crowd and give rise to lively debate. However, those tend to be exceptional cases. Citizen interest is generally low, with only a small number of participants from outside the council and the administration. Interviewees suggested several possible causes for this: sometimes the materials presented are made available at the last minute, or are not easy to understand, as in the case of the municipal budget; other times, participation does not appear to have led to a tangible impact, as was the case of massive participation in

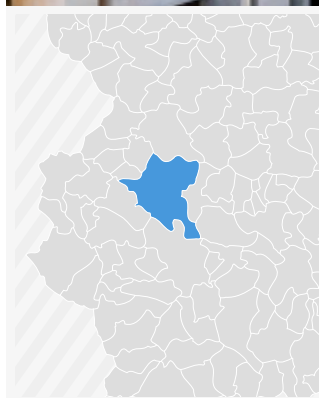
discussions on a planned industrial rezoning process that went ahead despite popular opposition. Such experiences create a feeling among citizens that participation is not worthwhile.

2. **Citizens eschew formal participation channels in favor of informal ones.** Despite the presence of formal consultative and communication mechanisms, citizens generally prefer to either share their complaints on social media or reach out in person to municipal leaders. For example, according to interviewees, citizens do not rely on the council committee on citizen relations as a communication channel. Instead, interviewees argued that having direct contact with the mayor and other key officials, by phone or in person, was a much more valuable mechanism. Impact, according to them, was more likely when pursued through personal contacts.

Recommendations

1. **Strengthen the public consultation process.** The absence of effective citizen participation is common across all municipalities in Bulgaria. Some have responded by adopting local ordinances on public consultations that outline a staged process of discussion, dissemination, and explanation of relevant information, including follow-up on decisions taken. Simple improvements like providing advance notice, supplying informative background materials, or breaking consultations into two stages—one for presenting an issue, the other for discussing proposals—could help dispel the perception that attending public consultations is not worthwhile. In general, people will see it as a positive trend if public discussions are covered more often on the municipal website, and if it showcases information on key issues and themes that will be introduced to the public.
2. **Consider adopting a participatory platform that makes it easier for citizens to express themselves.** It was clear from the interviews that Ruse citizens have strong views and a desire to express them, but that an effective and convenient platform for doing so is currently missing. The municipality could explore the possibility of adopting an open-source digital platform where citizens can discuss issues, vote on initiatives, submit proposals, and receive feedback from the authorities. There are multiple valuable examples of their use in Bulgarian municipalities and abroad.
3. **Jump start structured coordination between the administration, the committee on citizen engagement, and civil society.** With multiple isolated civic engagement formats already available, the next step for the municipality would be to connect these disparate bodies and groups through a formal and structured process focused on how to overcome citizen apathy and a legacy of disengagement. A dedicated working group comprising citizens, business, NGO representatives, council members, and deputy mayors could work on new participation mechanisms, such as sector-based public councils, drafting and adopting local ordinances, and an introduction of the e-platform mentioned above.

SOFIA



MUNICIPAL PROFILE

MAYOR	Yordanka Fandakova
GEOGRAPHIC COMPOSITION	Includes the city of Sofia, three other towns and 34 villages over 1,349 square kilometers
POPULATION	1.24 million
PRIMARY ECONOMIC SECTORS	Economic and cultural hub of the country, with a growing IT sector
OTHER	<ul style="list-style-type: none"> • The capital of Bulgaria • The 14th largest city in the European Union • The site of massive demonstrations against national government corruption in 2020

Findings and Recommendations

A municipal communication approach focused on technical, legal, and expert language creates a perception of opaqueness

Problem Statement

A perceived lack of transparency lowers citizens' trust in the municipality, despite the fact that there are sufficient rules and procedures for transparency in place. This problem stems partly from a communication approach that favors technical information and legalistic and expert language, but it is also a reflection of a lack of openness that discourages officials from acknowledging their limitations and explaining, clearly, how municipal processes work. The ultimate impact is a sense of opaqueness and distance which breeds citizen mistrust.

Findings: Key Strengths

1. **Both the administration and the council display a willingness to communicate.** Interviews revealed the existence of multiple channels for citizens to communicate with municipal officials. These include the 24/7 Contact Center for submitting queries and signals, as well as government open house days held by the municipal government in the municipality and by council members in their districts. The municipality is generally transparent about how these channels work and publishes statistics on signals received each month.
2. **Digitalization has improved transparency.** Most relevant government information for holding the municipality accountable is available online for citizens to access. The administration has a deputy mayor in charge of digitalization, and interviewees indicated that 95 percent of back-office processes are now electronic. The council also makes use of the municipal website, making all agendas and relevant reports (with the exception of attachments, due to size) available online. The municipal government's

commitment to expanding access to open data across sectors is a promising sign of how digitalization will continue to enhance municipal transparency.

Findings: Key Vulnerabilities

1. **The administration does not have a culture of openness.** Interviewees argued that citizens do not have an accurate perception of the true level of transparency in the Sofia municipality, either as pertains to the work of the administration or the council, for a variety of reasons. Besides the inherent complexity of the municipal government, citizens often find that matters are not well explained by municipal officials, who are likely to answer queries with formulaic or legalistic responses. Critical procedures like budget calculations are not entirely clear to citizens; in some instances, council members are reportedly not provided with explanations for certain budget choices. In their public information campaigns, the municipal administration and the council do not emphasize the impact of policy choices. When faced with criticism about inefficiency or underwhelming results, the reaction by the municipality is often to deny that anything has gone wrong. Even though the Contact Center reacts to citizens' signals, it is not clear what the timeline for resolving an issue is and it is up to the administrator to decide which cases are urgent and which are not.
2. **Information is not presented with ease of use in mind.** A common theme across interviews was the challenge of making official information more understandable and easier to use. The municipal website contains a lot of information, but it is not structured in a user-friendly searchable way, and parts of it are not up to date. In some instances, the municipality may release so much information that it can be overwhelming for non-specialists, as is the case with procurement; in other cases, relevant

information simply may not be available, as with the status of municipal properties or data on air quality. Contact details for councilors are not consistently published on the website; neither are details on their experience, education, or membership on the management boards of municipal enterprises or funds.³⁰ It is worth noting that Sofia's ranking in the "Access to Information Report" by the NGO Access to Information Program has declined in recent years.

Recommendations

1. **Use media and social media to explain what the municipality and council do.** Officials can take a more proactive approach to communicating decisions and processes through substantial and accessible information-sharing that does not default to technical language or legalistic approaches. In addition, there is room for the council and the administration to work with local media outlets to better explain municipal processes.
2. **Invest in building a culture of openness.** Transparency is not just about who public officials are and where money is spent, it is also about how and why decisions are made and what happens once public funds are allocated. The Sofia municipality can easily address citizens' low trust and perceptions of opacity by expanding its reporting to include projects that were either not implemented or implemented with lower quality than expected, and by ensuring that expert inputs are presented in accessible language. It would also be helpful for the municipality to develop a better understanding of existing transparency gaps by noting which topics generate the most access to information requests and preempting those requests by offering additional information. The council could contribute to a culture of openness by granting citizens comprehensive, uniformly formatted information on all its members,

³⁰ Council members in Sofia earn substantial additional income from membership on boards of enterprise or management boards of municipal funds. The lack of readily accessible public information on councilors' membership on these boards and income earned through it presents opportunities for councilors to be influenced in their work through allocation of board memberships." As one councilor put it, it is not illegal but it might also not be moral.

including their career backgrounds, fields of expertise, contact information, committee memberships, and open office hours.

Corruption-prevention efforts are hampered by administrative complexity and lack of citizen awareness

Problem Statement

Municipal efforts to fight corruption are not visible enough. This is worrying due to the size and administrative complexity of the Sofia municipality, which potentially creates more opportunities for corrupt behavior than existing control mechanisms can realistically prevent. When anticorruption is not a focus, officials and citizens are less likely to be aware of reporting tools and more likely to assume that corrupt practices are not absent, but merely hidden from sight.

Findings: Key Strengths

1. **There are many different anticorruption tools available across the municipality.** The administration has a special committee on conflict of interest, an audit committee, risk registers, and has introduced new internal rules on irregularities. The council has standing committees on anticorruption and citizen signals and has strengthened its oversight over municipal funds and properties. A double signature rule has been proposed for the main municipal enterprises to prevent irregular expenses.
2. **The municipality collaborates with outside actors to strengthen corruption prevention and promote sound public management.** Interviewees noted that the municipality is working with academic stakeholders to improve some internal management processes. Two areas of collaboration were highlighted: a program with the University of Sofia focused on transparency and conflict of interest and a partnership with the Institute for Public Administration on the Common Assessment Framework (CAF), a quality management system launched by EU member states in 2000.

Findings: Key Vulnerabilities

1. **Administrative complexity hinders the detection of corruption.** Sofia has a multi-layered administration that does not always act in a coordinated fashion or follow a cohesive strategy. Interviewees pointed to the “fog” resulting from administrative chaos as a factor that hinders oversight. But complexity also makes it more difficult to distinguish between corrupt practices and everyday mismanagement or inefficiency. Interviews revealed the same issues encountered in other municipalities—suspicions of tenders designed specifically for a single company, or pressure put on people who report or investigate corruption. But the size of the municipality increases the level of vulnerability to corruption, making it easier for perpetrators to obscure abuses under the guise of regular administrative mismanagement.
2. **Anti-corruption mechanisms are not well known nor trusted.** Though municipal corruption attracts less attention than corruption in the national government, there have been instances when allegations of corruption have surfaced in the media. Some interviewees complained that accusations tend to attract more publicity than rebuttals or corrective actions, and that citizens are unfamiliar with corruption prevention tools already in place. The interviews also revealed anecdotal evidence of signals shared through non-official channels, which means formal reporting mechanisms are either not well known or not trusted.

Recommendations

1. **Carry out awareness raising campaigns on corruption and prevention.** Corruption must be a focus in the government’s agenda and in public discourse for any preventive mechanism to have a significant impact. In the Sofia municipality, leaders in the administration and the council should state that combatting corruption is a priority, raising awareness among citizens about vulnerabilities and urging them to submit reports on potential abuses. It would also be worthwhile to offer some refresher training courses to administration officials and council

members about legal requirements and best practices on prevention. Even if practical preventive measures are used daily, a lack of citizen awareness can only be addressed through clear and consistent public messaging that corruption is a challenge that will be tackled through all means possible.

2. **Introduce more active monitoring mechanisms.** Existing anticorruption tools will not dispel public concerns about abuse if citizens do not know about them or cannot understand them. Beyond formulaic tools focused on legal compliance, public monitoring mechanisms could be introduced to allow media, NGOs, and the public to monitor expenditures and assess the performance of municipal departments, enterprises, and contractors. A more comprehensive use of registries would allow citizens to track processes, such as for registries of public housing or daycare spots with information on availability, as well as determine responsibility for bad performance. This kind of public monitoring would create an additional deterrent against corrupt behavior.

Participatory mechanisms seek citizen validation rather than citizen engagement

Problem Statement

Despite the Sofia municipality introducing significant steps toward a more participatory approach to decision-making, there is a lingering sense among citizens that decisions are made without including them, a perception that leads to civic disengagement. The administration and council need to move toward a less one-sided approach to participation—seeking citizen involvement rather than simply validation—so full potential of recent participatory reforms can be realized.

Findings: Key Strengths

1. **Sofia has a strong foundation of citizen engagement.** The Sofia municipality has the strongest NGO and activist presence in the country, including associations and groups focused on municipal decision-making and citizen participation. On the administration side, interviewees indicated that the mayor and her executive team are very open to engaging with civil society organizations. As for the council, it already has a permanent commission for communication with citizens, it has a record of reaching out to relevant NGOs when developing new policies, and it invites interested parties to join its sessions.
2. **There are strong rules in place for public consultation.** The municipality, the Bulgarian Center for Not-for-Profit Law, and the Forum Civic Participation jointly developed an ordinance on public consultations that has increased participation and cemented the expectation that significant municipal decisions should be subject to public consultation. Sofia is the only municipality with two ordinances on public consultations, one of which pertains exclusively to construction projects. Interviewees indicated that while only a few people attended public discussions ten years ago, the number of participants has recently been in the dozens, and even hundreds, for topics that are seen as highly important. All proposed regulations are subject to feedback and discussion, and citizens have come to expect that at the very least their voices will be heard, if not taken into consideration.
3. **The municipality and the council seek collaboration with NGOs.** Sofia has active NGOs in sectors such as education, culture, environment, and child services. Some of these are invited to join consultative formats with the municipality or the council, where they can discuss problems that need to be addressed. During the pandemic, the mayor launched an initiative to meet with business organizations to discuss negative economic impacts and potential ways of mitigation. Overall, interviewees agreed there is a willingness in the municipality to listen to NGOs, especially when it is faced with crises or difficult problems. Council members said they rely on NGO input early in the drafting and policy process.

Findings: Key Vulnerabilities

1. **The full potential of Sofia's new public consultation approach is yet to be realized.** Citizens are still more likely to express their concerns via Facebook than through the consultative process, no matter how well designed it is. Interviewees attributed this to a lack of motivation arising from a perceived lack of impact made by citizens. Another suggested explanation is that officials are simply not used to public discussions and do not understand how citizen feedback connects to their work. Relying on NGOs to manage consultations and engagement is a good stopgap measure, but ultimately unsustainable.
2. **The municipality and the council exhibit a one-sided approach to engagement.** There is a perception among Sofia's citizens and NGOs that consultations are primarily an opportunity for officials to present already-developed proposals, instead of incorporating citizens and their ideas early in the planning process. The Vision for Sofia process³¹ is among the few exceptions, although it was probably too big and expensive to replicate and the eventual decision-making process isolated civil society organizations. Citizens can address the municipal council, but this happens only at the end of the sessions, which are often very long, when many councilors have already left. All of this creates the sense that planning and decisions are made behind closed doors.

Recommendations

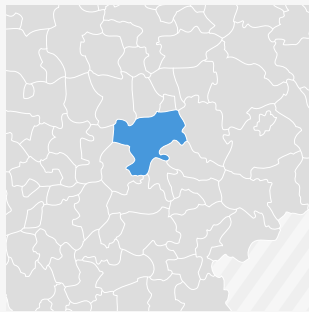
1. **Carry out internal outreach about the consultative process.** The Sofia municipality has a strong system of public consultations, ahead of many other municipalities, and yet it is underutilized because of persistent attitudes against public engagement in the administration. All managers, regardless

of their field of work, should attend a public discussion at least once, in order to understand the strengths and weaknesses of the process. They should also receive training on the ordinance for public consultations and on how to facilitate public discussions. Internal outreach should also be carried out on why citizen feedback matters and how best to capture it.

2. **Ensure citizens can easily suggest proposals.** Sofia's consultative approach should be used to foster interaction between civil society and the municipality on the identification of problems and development of new solutions. This includes creating opportunities for citizens to contribute priorities and projects to the municipal budget. Providing a citizens' budget for the Sofia municipality has been discussed for the last five years and even became an Open Government Partnership commitment for Bulgaria in 2018. The municipality should reconsider this, since it can be a good way to facilitate citizen contributions.
3. **Pursue more substantive engagement with NGOs.** The municipality should see NGOs and citizen movements as a resource that can supplement its expertise. The municipality should develop a database of all NGOs and sectoral organizations by creating a platform and inviting them to register, so that deputy mayors know who to reach out to and who to invite to relevant discussions and events. This would also inform NGOs about new policies and bring them more in line with the municipality in addressing citizen concerns. NGO involvement does not have to mean a large-scale participatory process like Vision for Sofia. Smaller-scale, everyday policy discussions are much more practical and sustainable.

³¹ "Vision for Sofia" is an initiative by Sofia Municipality to create a shared long-term strategy for the development of the capital and suburban areas until 2050. The project aimed to improve urban planning by including, at the beginning of the decision-making process, all relevant stakeholders including municipal authorities, NGOs, investors, researchers, experts, and citizens. The process started with a preparatory phase in 2016 and was officially launched in 2017. It included public events and discussions and lasted two and a half years. The result was the long-term municipal development strategy "Vision for Sofia," which was presented in 2019 and adopted by the Municipal Council of Sofia in July 2020. CSO interviewees reported that once the document was finalized, the Municipal Council excluded them from their adoption process, as well as how to implement it.

STARA ZAGORA



MUNICIPAL PROFILE

MAYOR	Zhivko Todorov
GEOGRAPHIC COMPOSITION	Includes _____ spread over 1,063 square kilometers
POPULATION	157,000
PRIMARY ECONOMIC SECTORS	Manufacturing, energy and tourism
OTHER	The second largest city in Bulgaria by GDP per capita

Stara Zagora is one of ten municipalities selected for IRI's VCA process in Bulgaria.³² It is situated in the center-south of the country, spreading over 1,063 square kilometers. With a total population of around 157,000, Stara Zagora is the sixth largest city in the country, and second in terms of GDP per capita. The municipal economy is focused on industry, with a third of workers employed in manufacturing, and by energy production, although the main city's historical and cultural significance attract tourism as well.

citizens do not have a good understanding of what the administration does and are more likely to seek redress through informal means, or direct appeals to the mayor, than through formal mechanisms. A focus on informal channels creates a risk of discrimination based on a citizen's access to the mayor or other officials; it also impairs traceability and accountability, which hinders the municipality's effort to demonstrate how much work it actually does. In that sense, informality undermines transparency and creates vulnerabilities to corruption.

Findings and Recommendations

Municipal transparency and responsiveness are inconsistent and create a perception of selectivity

Problem Statement

Despite significant efforts to increase transparency in the Stara Zagora municipality,

Findings: Key Strengths

4. **There has been a rising commitment to transparency in recent years.** Interviewees generally shared the perception that the mayor of Stara Zagora is very committed to transparency. Most relevant information on regulations, acts, and procedures is posted on the municipal website. Every year there is a report on the administration's work. A center for information and services to citizens was set up. And the mayor himself is a highly visible figure who communicates

³² The ten municipalities, in alphabetical order, are: Blagoevgrad, Burgas, Kardzhali, Pernik, Razgrad, Ruse, Sofia, Stara Zagora, Veliko Tarnovo, Vratsa.

with citizens daily. On the council side, sessions are broadcast live for citizens to watch.

5. **There are multiple mechanisms available for queries, complaints, and expressing concerns.** Interviewees also agreed that there are various ways through which citizens seeking information or raising a problem can get the authorities' attention. Contact details for all senior municipal officials are published on the website, and the mayor and his deputies have reception hours for citizens. Problems and suggestions can be shared on the municipal website or through a telephone hotline. Stara Zagora was among the first municipalities to establish a front office. On top of that, there is a very popular Facebook group called "Ask the Mayor," which many citizens use, where questions and complaints can be posted.

Findings: Key Vulnerabilities

1. **Information is provided in an inconsistent manner.** According to interviewees, while the municipal website is very useful, it is not updated regularly, nor is it easy to navigate from a user experience standpoint. Whenever information is not made available up front, citizens find it hard to get it via access to information requests; the Stara Zagora municipality has rejected such requests, in some cases leading to legal action from citizens. Interviewees shared a common perception that the municipality is less open when subject to criticism.
2. **Official communication mechanisms are often sidelined by unofficial ones.** Over the years, various unofficial channels have been established for posting reports of irregularities and sending messages to the municipality. At first, citizens used the My e-Municipality platform to post about unaddressed problems. Municipal employees were expected to act on these posts and notify the citizens of the outcomes. After a promising start, municipal responses slowed and some of them were formulaic and did not address a complaint's substance. Ultimately, functionality similar to the one of My e-Municipality was integrated into the official website of the municipality and the platform was abandoned. More recently, citizens have found it easier to take a matter to Facebook than to submit a comment, report, or complaint on the municipal platform or ask a question at a council session. The outsized role of *ad hoc*, unofficial mechanisms demonstrates the lack of popularity of official platforms, which might be due to perceptions that they are less effective or less user-friendly. Of course, it could also be that citizens simply do not know about them or how easily they can be used.

Recommendations

1. **Work with intermediaries to better explain how the administration works and what it does.** There appears to be a gap in the municipal communication strategy, which could be partly addressed through partnerships with local media outlets and other civil society actors. By working more closely with the media, the municipality can show citizens what the administration does. Alternatively, the municipality could work with civil society groups as trusted intermediaries, as it has in the past.
2. **Update the municipal website to enhance user-friendliness and accessibility of information.** A user-experience survey can be carried out to learn more about how citizens interact with the municipal website, what kind of information and services people are looking for, and what aspects of it they feel need strengthening. Adding more comprehensive and relevant information to the website will also minimize the number of access-to-information requests that the municipality needs to respond to.
3. **Make the official municipal platform more popular with citizens.** For citizens to trust that their government will respond to their problems, they need more than just a platform for sending complaints. The system must allow them to track what happens in real time, which unit is responsible for addressing questions and complaints, and what decisions or actions

are ultimately made. Stara Zagora already has such a system, but it is not widely used. Citizens tend to resort instead to third-party platforms, such as Facebook. A public information campaign about Stara Zagora's website is essential. The municipality can also use unofficial channels of communication (e.g., Facebook) to draw attention to official channels, ways to use them, and their advantages over unofficial ones. This will not only strengthen citizen satisfaction, but also improve knowledge and understanding of local government, and thereby build trust.

Limited opportunities for meaningful participation hinder citizen engagement and accountability

Problem Statement

Stara Zagora citizens are more active online or on the street than they are in formal participatory settings. By and large, they remain disengaged from the municipal council and the administration, which are not doing enough to either attract their engagement or work with NGOs as representatives of citizen concerns. This leads to a vicious circle of disappointment and disengagement, which undermines citizens' ability to hold their representatives accountable.

Findings: Key Strengths

1. **There have been attempts to include citizens in municipal decision-making.** Besides holding public consultations on matters required by law, the municipality has sought citizen engagement through other means. For example, the government used an electronic survey for citizens to give feedback on the Plan for Integrated Development of the Municipality, which increased participation far above previous rates of engagement. The mayor also engages citizens in the selection of mayoral

deputies³³ for smaller settlements via public consultation. Likewise, the referendum on the status of Bedechka Park was identified by interviewees as a good example of direct democracy in action, with the mayor supporting the will of the majority of residents to keep the park. On a more regular basis, council sessions are open for citizens to participate. And there have been initiatives like the Youth Council, a way to involve young people in the work of the municipal government.

2. **There is engagement with civil society around key issues.** According to interviewees, the municipality takes seriously those organizations that have valuable expertise or are seeking engagement with it. Some NGOs reportedly have excellent communication with the municipality. An ordinance has been adopted giving NGOs access to public funds for their proposals and activities.

Findings: Key Vulnerabilities

1. **Citizens see participation opportunities as too formalistic.** Interviewees agreed that there is not a lot of interest in public consultations or municipal decision-making in general. While this may be ascribed to apathy on the citizens' part, interviews revealed some weaknesses in the current approach to participation: information on public consultations is not released with sufficient advance warning, municipal council session announcements no longer include a detailed agenda or specify the opportunity for citizens to attend the meetings, and discussions are very formal and focused on making decisions instead of seeking inputs. In the Bedechka Park case, it was precisely the lack of public discussion that moved a small citizen movement to mobilize and seek corrective action, after an initial decision was to permit construction in the park.
2. **NGOs are not sufficiently engaged in strategic planning.** Despite having a good

³³ Mayor deputies are appointed in settlements of less than 350 permanent registered residents. They carry out mayoral responsibilities.

relationship with NGOs in terms of services and everyday activities, as well as having reinstated sectoral consultative councils with NGOs, the municipality was seen by some interviewees as not seeking the assistance of civil society organizations in shaping strategies or developing EU-funded projects. Collaboration tends to develop in a bottom-up manner, initiated by civil society. Substantive efforts at strategic collaboration, like a public forum for NGOs and the municipality, have received only lukewarm support from local leaders.

Recommendations

1. **Review the format and approach of public consultations.** Despite ongoing efforts to bolster citizen engagement, formal public consultations are not working as intended. The municipality should consider whether more could be done to present and explain issues to citizens before they are subject to discussion, and whether it can provide opportunities for debate and citizen input. There are examples in other municipalities of ordinances which have expanded on the law to provide for processes that are more engaging and inclusive.
2. **Establish structured collaborative mechanisms with civil society groups.** The municipality can build mechanisms for structured interaction with stakeholders in each major sector. This can serve two purposes, to disseminate critical information to citizens via trusted community voices and to receive technical inputs and strategic recommendations from organizations working on citizen services. The first step would be to update the list of relevant NGOs and ensure that there is efficient two-way communication with them. An additional step would be to establish a municipal public council to engage a group of citizens with relevant expertise who can act as a “think tank” for the municipality.

Lack of clarity around municipal expenditure decisions is a source of distrust among citizens

Problem Statement

There are concerns among Stara Zagora residents about potential irregularities in the way public contracts are awarded. This problem refers not necessarily to corruption but to perceptions of corruption, which in turn may attract truly corrupt actors seeking to take advantage of perceived weaknesses in control mechanisms. Injecting additional transparency and oversight into decisions around the use of public funds would build trust, dispel suspicions, and strengthen Stara Zagora’s reputation as a role-model municipality in transparent procurement.

Findings: Key Strengths

1. **Public procurement is quite transparent, compared to other municipalities.** Stara Zagora municipality complies with all legal requirements when it comes to public procurement. The process is transparent and based on electronic bidding. All contracts are published on the municipal website. In addition, all EU-funded projects must comply with audit and monitoring requirements that force the municipality to track progress and report on its decisions. In fact, in 2022, the Ministry of Finance acknowledged Stara Zagora as one of Bulgaria’s most transparent municipalities when it comes to public procurement.
2. **There are mechanisms in place for preventing conflicts of interest.** Stara Zagora was among the first municipalities to appoint an ombudsman. The council is currently updating its code of ethics. Public officials sign declarations asserting they have no conflicts of interest, those statements are then published on the website for the public to scrutinize, and a conflict-of-interest committee examines any potential violation, as required by law.

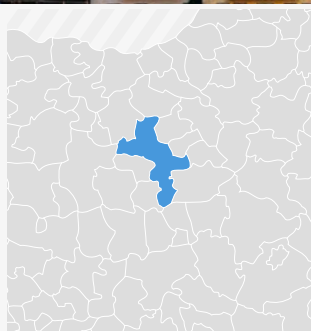
Findings: Key Vulnerabilities

1. **There are insufficient controls on public expenditure.** According to interviewees, the controls stipulated by law are sometimes not enough. In the case of EU funding, there are disincentives for adhering to strict control procedures. A shared understanding among political leaders that EU money is vital to the local economy makes them willing to move quickly to secure funding and implement projects, at any cost, during the finite periods those funds are available. Interviewees also raised concerns about unexplained events in public procurement, like the same person bidding through multiple companies, or individuals having inside information about what price and conditions to offer in order to ensure a successful bid. There is a sense that the municipality has no mechanisms for dealing with such irregular practices, partly because sometimes this is beyond its jurisdiction. Cooperation with investigative journalists and responsible institutions to raise awareness of these problems, combined with prompt monitoring actions by third parties can help the municipality.
2. **There are suspicions of favoritism in awarding public procurement contracts.** Interviewees shared a perception that public procurement contracts are often won by large companies from outside the municipality, which then hire local firms as subcontractors. Reportedly, local companies refrain from bidding due to this perception. Similar perceptions of favoritism exist regarding NGO competitions for contracts for social services.

Recommendations

1. **Increase transparency and communication about public expenditures.** The municipal website should be updated to include well-structured, comprehensive, end-to-end information on public expenditures including tenders, bids, winning proposals, contracts, contractor details, implementation reports, as well as any sanctions the implementing companies may have received. This will allow citizens, the council, and the administration itself to scrutinize the transparency and rules-based efficiency of public procurement. It will also help dispel perceptions of corruption that appear to be incompatible with Stara Zagora's formal public procurement and audit record.

VELIKO TARNOVO



MUNICIPAL PROFILE

MAYOR	Daniel Panov
GEOGRAPHIC COMPOSITION	Includes the city of Veliko Tarnovo, the towns of Debelelets and Kilifarevo, and 75 villages over 883 square kilometers
POPULATION	70,000
PRIMARY ECONOMIC SECTORS	Agriculture, light manufacturing and tourism
OTHER	Located at a crossroads between main transport routes going east-west and north-south

Findings and Recommendations

Deficits in transparency and openness contribute to perceptions of corruption

Problem Statement

There is a perception among the citizens of Veliko Tarnovo that local authorities are distant, almost hidden from view, and that some take advantage of this distance to advance their private interests instead of the public good. This perception persists, despite the apparent transparency and openness of the administration and council. This means the local government must analyze what measures need to be taken to address these perceptions. Absent that analysis and action upon it, regular citizens will continue to suspect improper conduct and dishonest motives, and corrupt actors may come to perceive Veliko Tarnovo as a place where they can seek illicit gains.

Findings: Key Strengths

1. **There is a general commitment to transparency.** The municipality complies with legal requirements on transparency, for instance by uploading relevant information to the municipal website and publicizing decisions and upcoming projects. According to interviewees, procurement information is uploaded in advance, and the opening of bids is public. The budget is also published with an explanatory note. Access-to-information requests are generally answered, and the media has no problem getting in touch with the administration. Council sessions are broadcast live and archived for citizens to see.
2. **There are formal mechanisms in place to ensure integrity.** The municipal administration has a code of ethics, as well as internal financial monitoring, audits, and checks. All of this is in support of its management systems that have been certified as compliant with ISO³⁴ quality management standards. Council members

³⁴ ISO refers to the International Organization for Standardization, which is an independent, non-governmental organization that develops voluntary, consensus-based, and market-relevant international standards.

submit asset declarations which are made available to the public, and there is a committee on conflict of interest that is monitored by the national anti-corruption commission.

Findings: Key Vulnerabilities

1. **Information provided by the municipality is sometimes incomplete and hard to understand.** Interviewees often complained that information on the municipal website is difficult to navigate, occasionally incomplete, and selective in its presentation. Concerns arose that the municipal government is inconsistent in announcing upcoming events and discussions, with limited advance information on proposals for discussion and deadlines for comments. Interviewees also highlighted limitations around the transparency of public expenditures: a sufficiently easy-to-understand budget is not made available to citizens, and information on contract execution, and oversight after contracts are awarded, is lacking. While access to information requests can make up for these deficiencies, the municipality ranks low on the Access to Information Index published by the Access to Information Program.
2. **The administration is sometimes seen by citizens as distant and unresponsive.** There was a concern expressed that citizens often don't know the municipality's inner workings or who to contact when faced with a problem. Interviewees referred to unexplained delays in municipal responses to formal queries; therefore, citizens often seek out the mayor because they see him as the only public figure who can address a problem for them. In that sense, everything depends on the mayor, but interviewees said he does not have a designated reception day or hold regular press conferences, which limits the chances for citizens to get a response or redress.
3. **The impact of formal mechanisms to combat corruption is unclear.** Interviewees indicated that existing mechanisms based on national legislation intended to prevent corruption

did not produce a clear enough impact for citizens. There is not enough information on public procurement and appointment procedures to counter suspicions that public contracts are awarded to a small subset of companies and appointments are not merit-based. The council does not currently prioritize the monitoring of municipal contracts of high public interest. Interviewees were largely unaware of other transparency and integrity mechanisms that may address these deficiencies.

Recommendations

1. **Prioritize ease-of-use and explanation in public information and communication.** The municipal website should be revamped with an aim to improve ease of use (perhaps after carrying out a user experience survey). Public information should focus on the questions and topics key to citizens' understanding of local government, and not simply include what is required to publish by national law or easy to present. It should clarify details on public expenditure oversight and narrative reports on budget priorities.
2. **Increase direct access for citizens and the media.** There is room for the municipality and the council to improve access for the media and citizens. All senior elected public officials (the mayor and municipal councilors) could hold reception days for citizens in the main town and possibly in the other communities in the municipality. Email addresses should be easily accessible on the municipal website to ensure that citizens can contact officials directly, particularly high-ranking administration officials overseeing the main sectors (social affairs, culture, urban planning, etc.). This will build trust between the citizens and representatives of businesses and NGOs and their municipal government counterparts, while also dispelling the perception that everything depends on one person. Press conferences should accompany every major decision and announcement to ensure that the media can inform the public.

3. **Explore the creation of a mediatory function for the municipality.** It is important for citizens to have a trusted, impartial intermediary that can receive their complaints and suspicions, aggregating them into well-articulated messages to present to the mayor and the council for review and response. Such an intermediary would send a clear message to citizens that potential vulnerabilities to corruption will be addressed. The municipality could approach non-partisan civil society groups and community members to act as trusted intermediaries who can monitor decisions and relay citizen concerns. Alternatively, council members could play this role by emphasizing their openness to receive and address citizen concerns.

Lack of clear and impactful opportunities for participation leads to citizen disengagement

Problem Statement

There is widespread acknowledgement that citizens do not participate enough in public decision-making in Veliko Tarnovo. This may very well be because strategic policy debates do not interest regular citizens who are often concerned with everyday matters. But this may also be because local authorities have not done enough to get them invested or made it easy for them to engage. Absent a clear push toward greater participation, a vicious cycle of disengagement will continue, limiting the prospects for accountability in the future.

Findings: Key Strengths

1. **The municipality is working to engage citizens.** The municipality holds consultations and tries to include citizen proposals in public decisions in accordance with the law; council sessions are also open to the public. Public officials acknowledge and lament the lack of citizen participation. In an attempt to boost attendance, they have tried to hold consultations at different venues, in different formats, and at different times; they have used surveys to gauge citizen priorities; and have consulted external experts on how to increase participation. For example, there is a digital platform called “The Citizens” which helps track alerts posted by citizens and provides information on which ones were addressed. And in 2020, the municipality adopted a strategy to encourage participation on cultural issues.
2. **There is official collaboration with NGOs on sector issues.** The municipality works closely with some social sector and charitable NGOs. Examples include a youth sector initiative that allocated funds for a youth festival co-organized with civil society, support for the local youth parliament, and inviting NGOs to participate in the municipal council’s committee for children and in setting the municipal strategy for youth. The municipality decides its annual cultural calendar based on ideas and input from the non-government cultural sector, with organizations selected on a competitive basis. There are also expert councils on culture and tourism, and the youth council is considered by interviewees a good example of a successful collaboration.
3. **Citizen action has made an impact on past decisions.** There are multiple active Facebook groups where citizens share concerns and mobilize for protests. In the past, citizens successfully organized to prevent residential construction in a local forest, and at the village level, citizens launched committees and initiatives to voice opposition to planned municipal projects.

Findings: Key Vulnerabilities

1. **There is little citizen input into municipal decision-making.** Citizens don’t attend public consultations, which are typically held during business hours; usually attendees consist of administration officials, council members, and a few journalists. When ad hoc consultative opportunities arise, the result tends to be similar. For example, as part of the Plan for Integrated Development of the Municipality preparation process, an online survey was made available for citizens but less than 300 responses were

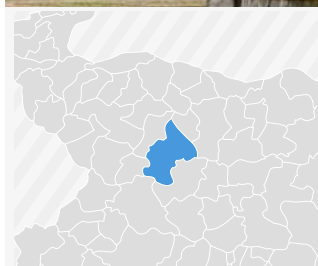
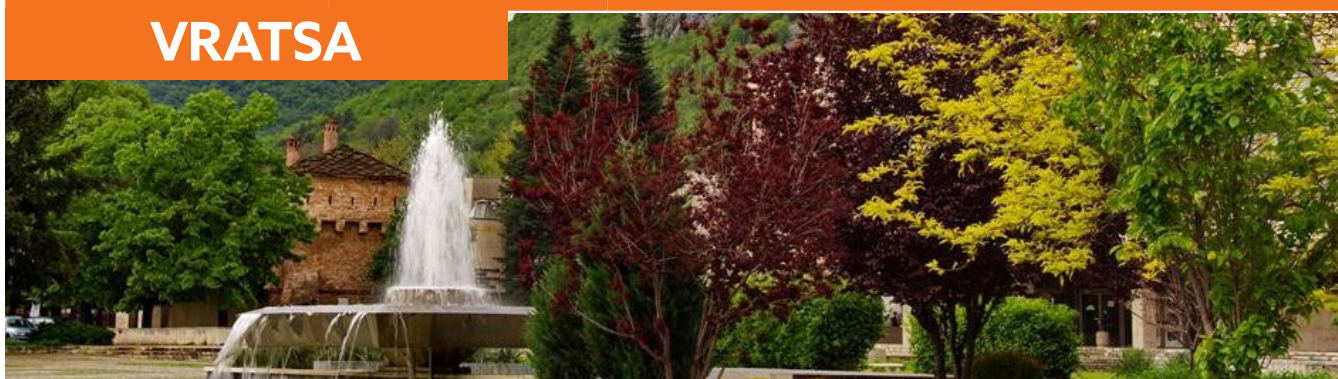
gathered. Interviewees indicated that council discussions are sometimes hard to follow, and that while citizens can submit questions, there is no follow-up to them during council sessions and often, citizens are better off expressing their opinions separately to a council member. Moreover, the pandemic-induced shift to online council sessions left no opportunities for participation or questions.

2. **Not all parts of civil society are equally engaged.** Some non-governmental sectors do not participate in setting municipal strategy. This is not due to their lack of availability or willingness. Instead, interviewees see a perceived reluctance from the municipality to partner with newer, less established NGOs. Interviewees said that they perceive a general lack of support (not only in terms of funding) for NGOs outside delegated services and social issues. They also reported an inconsistent pattern of interaction between the municipality and civic actors, some of whom are forced to raise the same concerns over and over again through protest, instead of shaping long-term policy through more consultative means. Meanwhile, expert councils are attended by a limited pool of participants. Likewise, interviewees are skeptical that views expressed in the youth council will be taken into consideration.

Recommendations

1. **Review the format and approach of public consultations.** Despite ongoing efforts to bolster citizen engagement, formal public consultations are not working as intended. The municipality should consider whether more could be done to present and explain issues to citizens before they are subject to discussion. This could provide opportunities for further reflection and give people time to prepare for discussions. Other municipalities have expanded on the national law with ordinances to provide for processes that are
- more engaging and inclusive. More frequent interaction with citizens through a diverse range of cultural and public events can positively impact civic engagement.
2. **Expand and improve the digital platform for citizen proposals and discussion.** The municipality could expand its commitment to gathering citizen proposals through online tools by reviewing the way its current system's module on public consultations works, by finding ways to use it more, and get better feedback. This platform would not replace official public consultations but serve as a complement to it, providing the municipality with a streamlined way to compile citizens' concerns and proposals. This would provide citizens with a platform for engaging before, after, and between formal consultations.
3. **Establish and consolidate structured working groups with stakeholders.** The municipality can establish dedicated mechanisms for structured interaction with stakeholders in each major sector. This would serve as a two-way tool to disseminate critical information to citizens via trusted community voices. It would also be a way to get technical inputs and strategic recommendations from those organizations working on initiatives and services for citizens. The current expert councils can be used as a foundation, but they need to be strengthened and made more inclusive. A public council can also be set up as a way to cover all issues of public importance relevant to the work of the municipality on, for example, a quarterly basis. Structured and predictable forums for consultation would energize the civic space and streamline the process of gathering inputs for municipal strategies and projects.

VRATSA



MUNICIPAL PROFILE

MAYOR	Kalin Kamenov
GEOGRAPHIC COMPOSITION	Includes the town of Vratsa and 22 villages over 697 square kilometers
POPULATION	63,000
PRIMARY ECONOMIC SECTORS	The textiles, metal processing, chemical, and ceramics industries

Vratsa is one of the ten municipalities selected for IRI's VCA process in Bulgaria.³⁵ It is situated in the north-west of the country, spreading over 697 square kilometers, and encompasses the eponymous town as well as 22 villages. With a total population of around 63,000, Vratsa is the administrative center of the municipality and district. The municipal economy is focused on manufacturing, mainly textiles, metal processing, chemical, and ceramics industries.

Findings and Recommendations

Insufficient citizen understanding and oversight of municipal decisions feed suspicions of corruption

Problem Statement

Despite significant gains in municipal transparency, the citizens of Vratsa express concerns that some elements of public procurement and recruitment may be influenced

by corruption. This perception is fed by a lack of understanding of how municipal government functions and how decisions are made, as well as by a lack of opportunities for civic monitoring. Unless accountability is strengthened, suspicions will lead to mistrust and thereby to citizen disengagement.

Findings: Key Strengths

1. **The municipality and the council are committed to transparency.** Interviewees agreed that transparency has been bolstered across multiple dimensions in recent years. All relevant municipal documents, mayor's orders, and council decisions are uploaded to the municipal website, which also hosts information on services provided to citizens (there are currently 13 e-services). The administration has an information center and responds to access to information requests; the mayor himself is visibly active both in person and on Facebook. Pre-COVID-19, the mayor held meetings in Vratsa's neighborhoods and in other villages in the municipality. As for the council, there have been regulatory innovations on transparency, such as making documents going back five

³⁵ The ten municipalities, in alphabetical order, are: Blagoevgrad, Burgas, Kardzhali, Pernik, Razgrad, Ruse, Sofia, Stara Zagora, Veliko Tarnovo, Vratsa.

years available online and creating a public list of citizens' questions asked during council sessions and the answers they received. Council members engage with the media, hold meetings explaining processes to citizens, and use Facebook to provide information on topics of discussion.

2. **There are corruption prevention mechanisms in place.** The municipality complies with national legislation on corruption prevention, having adopted such mechanisms as an ethics code, a risk register for conflict-of-interest prevention, a risk management committee, and conflict-of-interest declarations, which are posted on the website. There are regular inspections of companies and organizations that do business with the municipality. Municipal properties are documented in a register, and the ordinance that regulates their management does so in service to the public interest. There is also a mechanism for posting signals (including about corruption, available for citizens.

Findings: Key Vulnerabilities

1. **Citizens lack sufficient understanding of the municipal administration and council to be able to hold them accountable for public expenditures.** Municipal leaders acknowledge that legal controls are not enough, and that true accountability includes citizens. However, interviewees repeatedly alluded to the fact that citizens often do not understand what the municipality can or cannot do, or the role that the municipal council plays in making decisions and providing oversight, or indeed, whether there is any oversight at all. This is partly due to the absence of easily understandable information on public expenditures and projects such as registers and archives of contracts and contractors. This is also because some documents are available only on paper, and they are in the hands of public officials who are not always easy to schedule meetings with.
2. **There remain concerns about potential corruption.** Past cases of corruption continue to shape citizen perceptions in Vratsa. The

interviews revealed concerns about conflicts of interest and preferential treatment in public procurement, especially in cases where the municipality was sanctioned by the national government for poor execution of public procurement procedures. It is particularly difficult for citizens to distinguish between implementation shortcomings and corruption, as they often do not understand the selection process for tenders and how particular criteria are applied. Furthermore, there is a lack of transparency and public control during project implementation. There is insufficient clarity for those outside government on how municipal decisions are made. In some cases, these perceptions extend to municipal job seekers, who might believe that hiring decisions are pre-determined, despite a lack of concrete evidence.

Recommendations

1. **Work with the media or intermediaries who can explain how the government works.** Instead of a transparency gap, the Vratsa municipality is primarily faced with an explanation gap. Officials can take a more proactive approach to communicating decisions and processes, for instance, through more thorough and accessible publications, such as a quarterly newsletter with key developments and upcoming events. In addition, there is potential for the council and administration to work with local media outlets to better explain municipal processes to citizens.
2. **Enhance the quality and quantity of information on public expenditures and oversight.** Many suspicions about corruption could be readily dispelled simply by publishing some additional information that the municipality already has. For example, the municipal website could link to an easy-to-understand list of procurements that includes contractor details, implementation progress updates, and any sanctions or fines imposed for underperformance. The municipal budget could also be published in a more explanatory format that is easier for the

average citizen to understand, going a step beyond the current summary presentation.

3. **Provide opportunities for citizens and NGOs to monitor public expenditures.** In order to prevent allegations of corruption from arising in the first place, the municipality can reach out to NGOs and concerned citizens. It can offer them the possibility of participating in monitoring and oversight throughout the entire life cycle of a project, starting with public presentations on the goals and criteria of significant procurement projects. The council could also showcase its role overseeing the administration and the mayor's decisions on expenditures by making its monitoring mandate more visible.

Lack of proactive citizen engagement by the municipality contributes to a culture of non-participation

Problem Statement

The citizens of Vratsa lack a culture of participation that would motivate them to make use of participatory opportunities available to them. This is due in part to disillusionment following past negative experiences, and also to a feeling that their current opportunities for engagement are not meaningful or valued. A culture of non-participation amounts to a vulnerability to corruption because it smooths the way for interested actors to shape municipal policies and rules to their advantage.

Findings: Key Strengths

1. **Citizens are welcome to join discussions and submit proposals.** Vratsa has an ordinance on public consultations, which predates similar national legislation, that outlines the steps of the consultative process. It includes information on making relevant information available to citizens one month before public discussions are set to take place and on opening a period for citizens to submit suggestions. Citizens can also apply for funding for projects to improve their urban environments through the Little Citizens'

Initiatives campaign. They can also submit project proposals that pertain to culture through the municipal fund for culture. They can also join council sessions via Zoom, and interviewees reported that more and more citizens are watching them live. NGOs can reach out to the municipality, and there have been instances of positive collaboration in the social and IT sectors.

2. **Municipal leaders are willing to engage citizens.** Interviewees revealed multiple channels which public officials in Vratsa use to make themselves available, such as open reception days for senior administration officials. There is a popular Facebook group ("Tell the Mayor") that is reported to have a high response rate for signals and complaints posted. The mayor has also launched innovative initiatives, such as an annual citizen survey and meetings with young people studying or living outside Vratsa who return for the holidays. The council has expressed openness to introducing an online platform that would streamline communication between officials and citizens, including those who reside outside the municipality.

Findings: Key Vulnerabilities

1. **Formal participatory mechanisms do not motivate citizens.** There are Facebook groups where citizens of Vratsa are active, but offline engagement is much rarer. According to interviewees, the ordinance on public consultations has not yet had a significant impact in terms of actual participation. Only a few people, primarily administration officials, appear to be interested in public discussions in their current format. In contrast, citizens often perceive these discussions as deprived of impact, since proposals are often presented after they have already been developed in detail, which makes them appear as a foregone conclusion. There is a similar perception about joining council sessions, where citizens are limited to three-minutes of presentation time and are not entitled to an answer to their questions until the next session. Combined with a track record of little participatory impact during

past administrations, these barriers make it hard to rekindle public interest and trust.

2. **There is limited engagement between the municipality and NGOs.** Vratsa does not currently have a public council nor sector-specific consultative groups that have a tangible influence on municipal decision-making. Interviewees gave contrasting explanations for this lack of NGO engagement. On one hand, the municipality does not appear to seek collaboration with NGOs. On the other, municipal officials often are simply unaware of the NGOs to contact for such consultative groups. Many civil society groups are unclear about how to participate in public municipal events and are more likely to contact the mayor directly than to join a public discussion. This has led to a fragmented civic space where NGOs work on isolated projects instead of contributing their expertise to addressing municipal problems.

Recommendations

1. **Bring public decision-making closer to citizens.** Despite recent advancements, there is more that the municipality can do to bring its debates closer to citizens. Meetings in neighborhoods could be reinstated. These meetings could focus on tangible issues that attract attention and spur engagement from citizens. Allowing mayors of villages to submit ideas for funding prior to budget allocations would incentivize engagement by giving local communities an opportunity to debate and decide on these ideas. Discussions could be held on the municipal budget, even after its initial approval, whenever significant changes are made. Finally, it would be useful to hold public discussions before new initiatives are fully developed, so that citizens can shape decisions instead of simply validating them.
2. **Establish structured collaborative mechanisms with civil society groups.** The municipal administration and the council should see existing NGOs and engaged citizens as a resource that can supplement their expertise. To make municipal outreach to NGOs and sectoral organizations easier, the municipality could create a database of these organizations. It could do this by building an online registration site and by encouraging NGOs and sectoral organizations to use it, via an information campaign. This would also help provide NGOs with information about their sectors and bring them into closer alignment with municipal policy priorities.
3. **Adopt an online platform for strengthening citizen participation.** The municipality could expand its commitment to gathering input by adopting one of the multiple available open-source platforms designed for engaging citizens. Such a platform would not replace official public consultations but would serve as a complement to them. It would provide the municipality with a streamlined mechanism for compiling citizen concerns and proposals and it would offer citizens a way to engage before, after, and between formal consultations.

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