

**Annex [Note verbale reference: CU 2022/264]**

1. The secretariat has prepared the following questionnaire as a guide that States parties may wish to use to provide relevant information in line with paragraphs 22 to 24 of resolution 9/1, entitled “Sharm el-Sheikh declaration on strengthening international cooperation in the prevention of and fight against corruption during times of emergencies and crisis response and recovery”, including the provision of information on good practices and challenges concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery.
2. States parties may wish to take a broad view of emergencies and crisis response and recovery when responding to this questionnaire. Emergencies and crisis response and recovery may include humanitarian emergencies, natural disasters, conflict and post-conflict contexts, as well as health emergencies such as the COVID-19 pandemic, among others.
3. Collecting the information for this questionnaire may require cooperation by several different agencies/authorities. States parties may wish to send the questionnaire to agencies/authorities particularly involved in response and recovery efforts during times of emergencies, depending on their national system, as it calls for information on preventive anti-corruption measures, law enforcement and international cooperation. Such agencies/authorities may include:
  - Anti-corruption bodies, supreme audit institutions and other oversight bodies, and relevant entities with mandates to prevent and counter corruption;
  - National procurement agencies;
  - National law enforcement authorities;
  - National competent authorities responsible for international cooperation in criminal matters;
  - Development agencies.

## Questionnaire

### Contact Information

Please provide contact details for potential follow-up questions. Contact details will be treated confidentially.

*Country: Bulgaria*

**Please describe (cite and summarize) good practices your country has taken (or is planning to take, together with the related appropriate time frame) concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery.**

States parties are invited to provide information on experiences, good practices and challenges concerning the following:

#### **I. Understanding corruption risks and typologies during times of emergencies and crisis response and recovery, including transnational elements**

1. Has your government assessed corruption risks during emergencies or crisis response and recovery, either through formal risk assessments or other informal means? Please provide details, such as key findings and mitigation plans. Please describe whether any other (existing) risk assessment has been carried out that is relevant to the emergency response (such as sectoral risk assessments in procurement, healthcare, infrastructure, etc) and provide details.

The Money Laundering Measures Act (MLMA) provides for the establishment of a permanent inter-institutional working group, which includes representatives of the SANS, the Ministry of Finance, the Ministry of Interior, the Ministry of Justice and others. The Working Group assesses the national and transnational risks of money laundering and terrorist financing, including corruption, and prepares the national risk assessment and reports on its results. The 2019 National Risk Assessment Report identifies eight main money laundering risk events, one of which is money laundering generated from corruption through sophisticated money laundering schemes within or outside the country. A particular corruption-related threat in Bulgaria is fraudulent use of EU funds. Bulgaria has not assessed these risks specifically during emergencies or crisis response and recovery.

**The Commission for Anti-Corruption and Illegal Assets Forfeiture (CACIAF)** carries out actions to collect, summarize and analyze information on national anticorruption policies and measures. Primary and secondary budget managers in Bulgaria are obliged to develop and adopt an anti-corruption strategy every year. Annually, CACIAF performs an analysis of the anti-corruption plans and tracks the implementation of the anti-corruption measures, prepares findings for each administrative structure, as well as makes recommendations. CACIAF also performs an annual analysis of the reports on the implementation of the anti-corruption plans of primary and secondary budget managers. The reports prepared by the CACIAF on the analysis of the anti-corruption plans and on their implementation are published on the website of the CACIAF at the address.

2. Please list the main typologies of corruption (corruption risks) you have identified in your country's emergency or crisis responses and recovery. You may select from the list below, and add any additional risks not listed:

#### **Public Procurement**

- Bribery of procurement officials

✓ Excessive use of non-competitive bidding procedures, including by single or limited source tendering, with limited safeguards

Improper application of emergency procurement procedures allowing for expedited delivery of goods and services

Bid-rigging (e.g. use of inflated prices)

### **Misappropriation of Emergency Relief Funds**

Non-eligible beneficiaries circumventing rules and regulations, including through bribes, to obtain access to relief and support

Diversion of donations away from intended beneficiaries

Exploiting international financial assistance related to emergency relief or other types of support (such as donor funding or technical assistance)

Embezzlement of profit gained from the sale and distribution of emergency supplies

Manipulation and inflation of claims for economic relief

✓ Fraudulent billing for the provision of goods and services

Diversion of donated equipment/supplies to the black market

Companies hoarding/not discharging support received from the government

### **Conflicts of Interest**

Conflicts of interest between suppliers and authorities in procurement processes

✓ Political appointees or persons entrusted with prominent public functions involved in, or the beneficial owners of, companies bailed out by the government or companies involved in procurement processes

Support packages distributed according to ethnicity and/or political affiliation

### **Misuse of Information**

✓ Use of social media to spread misinformation, undertake fraudulent activities such as phishing, cyber-criminal fraud

### **Inadequate Reporting/Protection Mechanisms**

Inadequate reporting/protection mechanisms for whistle-blowers and witnesses

Restricted ability to report potential corrupt activities

### **Other Corruption Risks**

Extensive use of government emergency powers and regulations, with insufficient controls, consultations and/or guidance

Provision of counterfeit good and supplies

Fraudulent or illicit production of goods, including research

✓ Impeded anti-corruption enforcement actions during emergency and crisis responses due to corruption

Impeded provision of international cooperation (e.g. mutual legal assistance) due to the emergency or crisis due to corruption

Links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering

Please list any other typologies or risks:

In recent years, "**Financial Intelligence Directorate**" **SANS (FID-SANS)**, the Bulgarian finance intelligence unit, has received notifications of suspicious transactions and inquiries from foreign Financial Intelligence Units concerning political exposed persons (incl. foreign PEPs) and possible links to bribery. In connection to misappropriation of emergency aid funds, **FID-SANS** has received an international exchange inquiry from a foreign FIU concerning possible fraud by the supply of medical equipment under a procurement contract concerning the COVID-19 pandemic linked to corruption committed in a foreign country.

**Ministry of Interior (MoI)** identifies the increased arrival of migrants and refugees on the external borders of Bulgaria as a corruption risk as officials could accept bribes to permit migrants and refugees to cross borders without the necessary documents.

3. Did any of the corruption risks (typologies) identified in question 2 entail an international element? For example, fraudulent or collusive procurement practices involving foreign or international bidders or suppliers, donors or international financial institutions; aspects of transnational bribery; diversion of resources, assets or persons across borders)? Please be as specific as possible and provide details and examples. If the information is sensitive, please describe the typology or give anonymized examples.

The typology of the case set out in section I.2 by the **FID-SANS** can be presented as follows: A foreign company has been awarded a public procurement contract for the supply of medical equipment, and the company has received funds from government institutions of the inquiring country. It has been established that the foreign company has also received funds from a company registered in Bulgaria with an owner of the nationality of the requesting country, but no information has been established whether the transfers between the foreign and the Bulgarian company are directly related to the procurement. At the same time, the foreign company which received the public contract is owned by the Bulgarian company and by persons who are citizens of the applicant country. It has been established that the foreign company that received the public contract is the subject of a criminal investigation in the requesting country, possibly related to corruption, as public procurement is often associated with corruption risks

4. Please describe whether the corruption risks identified in question 2 appear to be longer-term trends. Have they required new or strengthened anti-corruption actions as a result? If so, please elaborate.

According to **MoI**, an increasing number of new reports regarding committed and ongoing crimes containing a corruption element is a long-term trend.

5. Please describe any measures taken to support the private sector in identifying and mitigating corruption risks. This may include particular risks associated with supply chains and procurement processes.

In 2021, **SANS** has provided all credit institutions in Bulgaria with money laundering risk indicators.

According to the **MoI**, discussions with the private sector (representatives of NGOs, civil society associations, business and industry organisations and companies) are regularly held to identify

and discuss the nature of corruption risks and the possible reporting channels in case of suspicion of abuse of power or corrupt practices in the public and in the private sector.

6. Please provide an overview of efforts taken to understand the particular impact corruption in times of emergencies and crisis response and recovery may have on women and marginalized and vulnerable groups. If possible, please include reference to any research, analyses or assessments undertaken in this regard.

N/A

7. Is there a greater need for international cooperation in responding to corruption risks in the context of emergency and crisis responses than in other situations? Why, or why not?

N/A

## **II. Addressing corruption during times of emergencies and crisis response and recovery at the domestic level**

1. Please describe the anti-corruption controls, safeguards and/or measures put in place to address the corruption risks identified above in question 2. Please highlight any special measures that may have been introduced in response to a particular emergency, and whether those measures may be useful for future crises. These may include anti-corruption task forces, the use of real-time audits, transparency portals and specific reporting channels for reporting corruption in the context of emergencies, including in the areas below.

A good practice in the **MoI** is the establishment of the Internal Coordination Council for Prevention and Counteraction of Corruption, which coordinates the implementation of anti-corruption measures. The Council is responsible for drawing up the MoI's annual anti-corruption plans, which are then approved by the minister. The anti-corruption plans and the reports on their implementation are sent to the CACIAF for evaluation of their overall implementation and for making recommendations.

### **Public procurement and the management of public finances**

2. Please describe measures taken to develop and/or further strengthen accountability and transparency in public procurement during times of emergencies and crisis response and recovery. These may include:
  - The development of specific guidelines, circulars or memorandums for procurement in emergency contexts;
  - The development of new codes of conduct or guidelines for procurement personnel during times of emergencies and crisis response and recovery;
  - Requirements to disclose potential and real conflicts of interest;
  - Reforms of legal, regulatory and policy frameworks governing public procurement;
  - Requirements to collect and publish the beneficial ownership information of entities contracting with the government;

- Requirements to cross-check information available on the ultimate beneficial owners of companies involved in procurement processes;
- Publication of information on the whole procurement cycle, from tender to delivery (including type and amount of contract, reference information for the awarded company, beneficial ownership information, validation of delivery, etc.);
- Specific labels or “tags” for procurement contracts to facilitate the monitoring of contracts associated with a particular emergency or crisis;
- Measures to ensure procurement in emergency contexts have appropriate oversight and sanctions, including the potential disqualification of companies;
- Measures to help ensure that compliance programmes and safeguards are in place for bidders;
- The use of online portals that afford opportunities to track procurement contracts through the whole procurement cycle;
- Feedback mechanisms for monitoring by groups outside the public sector, such as civil society organizations.

The Bulgarian Public Procurement Act contains special rules on the conduct, awarding and performance of public procurement in times of crisis (incl. armed conflicts, state of emergency). In 2020, the **Public Procurement Agency (PPA)** took measures to increase the transparency and accountability of public procurement during the state of emergency by preparing and publishing 6 methodological guidelines regarding the implementation of provisions of the Law on Measures and Actions During the State of Emergency (LMADSE). Answers were provided to written inquiries regarding the application of the provisions of LMADSE. The Guidelines of the European Commission on the implementation of the regulatory framework for public procurement in the emergency situation caused by the COVID-19 crisis were also made available on the Public Procurement Portal (PPP).

In 2020, mandatory use of a national centralized electronic platform CAIS EOP was introduced in the awarding of public contracts for all contracting authorities, including for contracts below the thresholds of EU Directives (<https://www2.aop.bg/en/home/>). E-public procurement allowed all parties to work remotely and made public procurement access and management possible by anywhere in the world, including through the use of mobile devices. In 2021, all public procurements in Bulgaria were launched and awarded in an electronic environment - from the planning stage to the stage of awarding and management of the public procurement contract. According to data, in 2021, 86,382 tenders were submitted by economic operators through the CAIS EOP system.

3. Please highlight 2-3 good practices and challenges faced when developing, implementing and/or monitoring the measures you have identified in question 2.

**APP** has created A Call Center for end users of CAIS EOP to provide expert technical assistance regarding the use of the platform. Through the PPP, the agency provides access to the rubrics "CAIS EOP – Current issues" and "CAIS EOP - Questions and Answers". In these sections, training videos, instructions, answers to frequently asked questions are published to assist end users of the system in various aspects related to e-procurement. APP provides data in an open format on the concluded contracts for public procurement, including those related to exceptions from the scope of the PPL, and for additional changes in the process of contract. Statistical data on number of contracts, contracting authorities/operators with the highest number of contracts and with the highest total value of the contracts is also publicly available. <https://app.eop.bg/today/reporting/statistics>

4. Were internal audit systems, real-time audit mechanisms and/or other mechanisms used to help monitor and oversee the management of public resources during times of emergencies and crisis response and recovery? If so, please describe. Please provide any information on good practices and/or lessons learned.

N/A

5. Please describe what measures or initiatives could be used/have been used to help ensure transparency in the allocation, use, distribution and management of the national budget during times of emergencies and crisis response and recovery. These may include dedicated budget lines, measures to present budget items, public hearings or rendering such information accessible to the public.

N/A

#### **Inter-institutional coordination at the national level**

6. Please outline measures which could be taken or have been taken to enhance coordination among institutions at the national level involved in response and recovery efforts, such as Memorandums of Understanding, data sharing agreements, standard operating procedures or other formal and informal mechanisms that enable institutions to share information and respond in a coordinated manner to corruption risks in the context of emergencies.

The MLMA provides framework for inter-institutional cooperation - in case of suspicion/awareness of money laundering and/or related predicate offences, the **FID-SANS** is obliged to disclose this information to the prosecutor's office and law enforcement authorities. The Law on Combating Corruption and Confiscation of Illegally Acquired Property (LCCCIAP) provides for the cooperation between the Prosecutor's Office of the Republic of Bulgaria and the **CACIAF** during the collection, analysis and verification of information in the event of corruption of senior public office holders. **CACIAF** has also signed Memorandums of cooperation with national organisations - Bulgarian Industrial Capital Association, Bulgarian Construction Chamber and others for the exchange of information and expert assistance in the investigation of corruption crimes. **MoI** also actively cooperates with other structures at national level by holding working meetings and actively exchanging information when violations of the law are detected.

In connection to the National Risk Assessment, a Plan to mitigate the risks of money laundering and terrorist financing has also been adopted, under which a number of measures have been implemented such as enhancing the capacity of law enforcement authorities to investigate and prosecute money laundering/terrorist financing and related predicate offence through training, development of practical methodologies/guides for conducting financial investigations.

#### **Transparency measures, including access to information**

7. Does the government have specific measures in place to identify individuals who may be involved in, or who help facilitate, corrupt acts? Such measures may include requirements to disclose beneficial ownership information and requirements to make such information accessible to law enforcement or other authorities. For example, information contained in beneficial ownership registries or information contained in open tender portals may be used by supreme audit institutions and other oversight bodies to audit, and inform, response and recovery measures.

**MoI** uses a variety of information sources, including databases of other institutions, as well as open data sources when carrying out operational-search activities. Ministry of the Interior Act (Article 4) provides for the possibility of requesting information from any organisation or institution, unless the procedure for such access is determined by a special law like Electronic Communications Act, Special Intelligence Means Act.

8. How does the government ensure that emergency measures are limited in duration and scope? Please describe any measures taken to mitigate the use of broad emergency executive authority, such as legislative oversight, regular reports to committees, and review and monitoring mechanisms.

Orders introducing the relevant emergency measures shall specify the time limits for their implementation. The measures shall be taken on the basis of a declared state of emergency and may be continued only within the framework of that state of emergency.

9. Have your authorities applied or strengthened whistle-blower protection or reporting systems, including those that afford opportunities for confidential and/or anonymous reports, and how to address such reports?

All citizens and representatives of legal entities can submit signals and complaints to the **Prosecutor's Office**, including electronically. Anonymous signals, when they contain evidence of a criminal offence, cannot serve as a legal reason for initiating pre-trial proceedings. Measures for the protection of victims and witnesses are laid down in the CPC. In addition, Protection of Individuals at Risk in Relation to Criminal Proceedings Act provides for a special protection when those individuals cannot be effectively protected under the CPC.

Under LCCCIAP anyone who has information about corruption or a conflict of interest for senior public office holders can report it to the CACIAF. The law contains provisions for the protection of whistleblowers: the employees who are assigned to consider the report are obliged not to reveal the identity of the sender of the report, as well as facts and data that become known to them in connection with the report. CACIAF has adopted and approved Internal Rules for accepting and considering reports of corruption or conflict of interest and for the protection of whistleblowers to ensure the acceptance, registration, and consideration of each report and the protection of whistleblowers. The rules are available on the official website of CACIAF (<https://www.caciacf.bg/bg/normativna-uredba/vytreshni-aktove>). The law also provided for the possibility, in special cases, at the request of the chairman of CACIAF, to seek the assistance of the authorities of the MoI to take additional protection measures.

#### **Use of information and communication technology tools**

10. Has the government used information and communication technology tools to build, implement and/or maintain resilient emergency response systems? If yes, please explain what types of tools have been used and include relevant links, if possible.

N/A

11. If possible, please describe the benefits and challenges of using the tools identified in 10?

N/A

12. Has the government used information and communication technology to help manage and oversee public procurement during times of emergencies? If yes, please explain the particular tool, its benefits and challenges and include relevant links, if possible.

See the answers to II.3 and II. 4

13. Has the government used information and communication technology to promote transparency in the management of public finances during times of emergencies and crisis response and recovery? If yes, please explain the particular tool, its benefits and challenges and include relevant links, if possible.

See the answers to II.3 and II. 4

#### **Engagement of actors outside the public sector**

14. If possible, please provide an overview of how the government has partnered with, or encouraged the participation of, actors outside the public sector to help monitor and support oversight of government actions during times of emergencies and crisis response and recovery. Please also include any future initiatives planned.

N/A

15. Are there any policies or initiatives that particularly facilitated the engagement of actors outside the public sector in these contexts? If yes, please describe.

N/A

### **III. Responding to corruption during times of emergencies and crisis response and recovery, including through international cooperation**

1. If possible, please provide examples of detected or suspected instances of domestic or transnational corruption and how these were identified in your country. If the information is sensitive, please describe the typology or give anonymized examples.

See the answers to I.2 and I.3

2. How did the government respond? Has your country taken any steps to identify, investigate or prosecute corruption in emergency and crisis responses and recovery? Examples may include an interagency cooperation taskforce among anti-corruption authorities, analysis of suspicious

transaction or financial disclosure reports, greater cooperation across international borders, strengthening investigation and prosecution capacity, etc.

N/A

3. In its response, did your authorities find it necessary to seek or request international cooperation (e.g. mutual legal assistance or direct law enforcement cooperation)? Please provide details and examples. How effective do you believe the cooperation was, and what were the main challenges? Was the assistance provided, were there any obstacles?

**The Prosecutor's Office** has signed Memorandums of Understanding and Agreements for the exchange of data and information with the prosecution and judicial authorities of various countries. A Memorandum of Understanding has also been signed with the European Central Bank and the Association of Banks in the Republic of Bulgaria to cooperate and exchange information related to corruption, money laundering and terrorist financing offences.

International legal cooperation activities are also successfully supported by the Bulgarian National Office in Eurojust. In 2020, 19 (22 in 2021) coordination meetings were held, with the participation of representatives of the Prosecutor's Office of Republic of Bulgaria and investigative authorities of other countries.

A new unit has been established in the Supreme Prosecutor's Office of Cassation - "Crimes against the EU financial interests and interaction with the European Public Prosecutor's Office", whose main objective is to improve the cooperation with other institutions (OLAF, AFCOS, Eurojust, European Judicial Network, Europol).

The competent bodies of the MoI also report to work in direct cooperation with their counterparts from the neighbouring countries when carrying out operational search activities in the border areas. No obstacles have been encountered so far.

4. Has your government received any requests for international cooperation from other countries seeking to identify, investigate or prosecute corruption during times of emergencies and crisis response and recovery? Please provide details and examples. How effective do you believe your authorities cooperated, and what were the main challenges? Was the assistance provided, were there any obstacles?

In 2021, the number of incoming MLA requests received for execution by the territorial prosecutor's offices was 1 081, while in 2020 their number was 1 252. An effective instrument for collection of evidence between the EU Member States is the European Investigation Order (EIO), introduced in 2018. The EIO replaces traditional forms of MLA when it comes to the collection of evidence.

Difficulties due to the pandemic are observed in extradition proceedings initiated by or in countries with which cooperation is based on the principle of reciprocity or with geographically distant countries. Most often, these proceedings experience delays in the receipt of documents as a result of logistical obstacles.

In 2020 and 2021, the enforcement of the acts of foreign jurisdictions, which granted the surrender of persons requested by the Bulgarian competent authorities with an EAW, was associated with some difficulties, as in many cases the foreign competent authority was requested to extend the deadline for surrender due to administrative restrictions - quarantine of the person.

#### IV. Mechanisms to respond to corruption during times of emergencies and crisis response and recovery through international cooperation

1. Have your authorities had any practical experience in sharing information, including spontaneously, with authorities in other countries concerning suspected corruption in the context of emergency or crisis responses?

**FID-SANS** successfully exchanges information on its own initiative and upon request, incl. on corruption cases, with foreign partner services through secure exchange channels on the basis of international treaties and/or under conditions of reciprocity.

As a result of the pandemic, communication and correspondence between **the Prosecutor's Office** and foreign authorities/institutions is predominantly done remotely - requests for legal assistance are received electronically, online meetings are held through various platforms. Working and operational meetings at national and international level are carried out via videoconferencing, training is conducted remotely. According to the **Supreme Prosecutor's Office of Cassation**, conventional instruments of international legal assistance (the European Investigation Order, joint investigation teams, cross-border monitoring, transfer of criminal proceedings etc.) remained applicable during the pandemic. At the request of prosecutors' offices in Bulgaria, 143 cases have been registered in the EUROJUST Case Management System in 2020 and 146 in 2021. Coordination meetings were also held with the participation of representatives of the Prosecutor's Office of Republic of Bulgaria and investigative authorities of other countries. EUROJUST has facilitated the establishment of 5 Joint Investigation Teams between Bulgaria and other countries.

**MI** has appointed contact officers to participate in the information exchange process at EU level and/or with the international organisations involved.

2. Has your government used electronic communication channels or networks, including those of INTERPOL or the GlobE Network, that enable the prompt exchange of information for the investigation and prosecution of corruption offences in the context of emergency and crisis responses?

See the answers to IV 1.

According to the **Ministry of Interior**, the GlobE Network has not been used to exchange information by the investigation and prosecution of corruption in the context of emergency measures and crises.

3. Are you aware of any examples of joint or parallel investigations or the bilateral sharing of capacity and expertise on investigating and prosecuting corruption in this context?

N/A

4. Have you taken additional measures to analyse asset declarations, financial disclosures and/or suspicious transaction reports during times of emergencies or crisis response and recovery?

N/A

5. Have you experienced challenges in accessing adequate, accurate and up-to-date information on the beneficial ownership and control of legal persons in other jurisdictions? In your view, what may be improved to enable effective, timely access to such information?

FID-SANS reported that in general it has experienced no difficulties to access information on the beneficial ownership and control of legal person in other jurisdictions since SANS mostly communicates with financial intelligence units from EU Member States. Difficulties in accessing that information arise in the course of communication with countries with preferential tax regimes.

According to the CACIAF, access to information on beneficial ownership and control of legal persons can be challenging in countries which do not support a central register of legal entities or where the registers require different mandatory search and reference criteria which are not always available to foreign partners.

6. Have you experienced challenges in verifying assets beneficially owned by public officials abroad? In your view, what may be improved to enable effective, timely access to such information?

According to the CACIAF, some countries lack a centralized register of bank account information and/or a property register, which makes it impossible to trace the assets of any natural person, as well as public officials.

7. Have there been any efforts to support anti-corruption practitioners and law enforcement authorities in your country, including human resources management and opportunities for capacity-building and peer-learning on methods, tools and technologies for countering corruption in the context of emergency and crisis responses?

**Prosecutors and investigators** have actively participated in trainings related to the investigation of corruption crimes during the pandemic, conducted mainly remotely or via videoconferencing. No training events have been organised specifically on corruption in emergency or crisis situations. Topics on which trainings have been held include: 'Protection of the financial interests of the EU. Criminal offences. Functions of OLAF. European Public Prosecutor's Office'; 'International legal cooperation in criminal matters between EU Member States - instruments based on the principle of mutual recognition'; 'Combating tax crime in the EU'; 'Legal supervision in a state of emergency. Criminal offences and challenges for pre-trial authorities during the state of emergency'.

**MoI** officials have also participated in trainings, seminars and exchanges of experience on methods, tools and technologies to counter corruption.

8. In your view, are there any unique aspects of requesting or providing international cooperation in emergency and crises responses as opposed to regular cases?

There are no unique aspects in requesting or granting cooperation during a state of emergency compared to regular cases. Difficulties have been found in extradition proceedings initiated by or in countries with which cooperation is based on the principle of reciprocity or with geographically distant countries. Delays in the exchange of documents due to logistical obstacles are most frequently observed.

9. Does your government have any experience in receiving or providing international financial assistance (such as donor funding or technical assistance) to address emergency situations? In your view, what are effective mechanisms to strengthen integrity and prevent corruption in the provision of emergency relief funds? What should be improved?

N/A

**V. Effectiveness of international frameworks to respond to corruption during times of emergencies and crisis response and recovery, including through international cooperation**

1. Are there any longer-term trends related to addressing corruption in emergency and crisis responses that require a new or improved anti-corruption approach in the future? Or that require greater international cooperation or new ways of working together? Please explain.

N/A

2. Are there any measures or processes that you would consider good practices to facilitate international cooperation and rapid exchange of information in emergency and crisis situations? Examples could include measures to accept electronic copies of mutual legal assistance requests and prioritize requests concerning corruption during times of emergencies and crisis response and recovery. Has your country had any experience in this regard?

N/A

3. How should countries strengthen collaboration to address corruption risks arising in emergency and crisis situations, with respect to international cooperation? Please list up to three measures countries could apply that would strengthen international cooperation in this regard.

Conducting seminars, round tables to exchange good practices in neutralizing corruption risks.

4. Have there been any efforts by your government to enhance cooperation with multilateral, international or regional bodies to address corruption and other forms of crime during times of emergencies and crisis response and recovery?

**CACIAF** constantly makes efforts to develop and improve international cooperation with multilateral, international, or regional bodies to deal with corruption, regardless of the presence of emergencies and/or crises. During the COVID-19 pandemic, the Commission has signed nine memorandums of cooperation with bodies/institutions with similar powers in different, mostly European countries. CACIAF also joined as a full member of several international and regional bodies and networks, namely the Network of Corruption Prevention Authorities (NCPA), the Network for Integrity, and The Network of European Integrity and Whistleblowing Authorities (NEIWA).

**VI. Data collection**

1. Have your authorities collected data or statistics to track and analyse trends concerning international cooperation to further prevent, identify, investigate and prosecute corruption during times of emergencies and crisis response and recovery. Are these publicly available?

**The Prosecutor's Office** reports that no specific study has been conducted to collect and analyse trends concerning international cooperation during times of emergencies.

2. Have your authorities collected data or statistics to track and analyse trends and links between corruption and other forms of crime? Are these publicly available?

Periodically, **the Prosecutor's Office** collects statistics on criminal proceedings initiated for certain types of criminal activity of particular public interest, including corruption, organized crime, human trafficking, money laundering, tax crimes, misuse of EU funds, counterfeiting of currency and non-cash means of payment. The reports are published on the Prosecutor's Office website.

*Please outline actions required to ensure or improve the implementation of the commitments contained in paragraph 23 of resolution 9/1, as well as any challenges faced or technical assistance required.*

**Please describe (cite and summarize) measures/steps your country has taken, if any (or is planning to take, together with the related appropriate time frame) to explore and enhance knowledge of the links between corruption and other forms of crime, in particular organized crime and economic crime, including money-laundering, including during times of emergencies and crisis response.**

States parties are invited to respond to the following questions:

**I. Analyses and assessments to explore and enhance knowledge of the links between corruption and other forms of crime**

1. Has your government undertaken any analyses or assessments to better understand the links between corruption and other forms of crime, including typologies of crime and how corruption may be used to facilitate and enable organized crime?

The National Risk Assessment aims to examine the links between corruption, organised crime and other predicate crime in the context of money laundering risks. The annual reports, prepared by the **MoI**, also analyse the links between corruption and other forms of crime.

2. Has your government taken any measures to strengthen legal, regulatory and policy frameworks that recognize how corruption and other forms of crime may be linked and that call for coordinated anti-corruption action?

N/A

3. Does your country's national risk assessment or other policy framework to prevent and combat money-laundering recognize and address the risk of laundering of proceeds of corruption and other economic crime?

N/A

## II. Specific mitigation measures to address corruption and other forms of crime during times of emergencies and crisis response and recovery

1. Have your country's authorities undertaken any investigations into unfair commercial practices, such as price-gouging and the manipulation of prices of essential goods and services, or bids, or abuse in the allocation, distribution, use and management of relief and recovery funds? Have your country's authorities undertaken any investigations into corruption during times of emergencies and crisis response and recovery, such as bribery of procurement or other public officials, embezzlement of profits, diversion of resources and conflicts of interest? Have any measures been applied to freeze and seize related proceeds of crime?

In 2020, the **Prosecutor's Office** has ordered several inspections concerning the sale of medical products and supplies through advertisements on websites without authorization and at prices that exceed the approved and registered ones. The **Prosecutor's Office** has assigned the National Council on Prices and Reimbursement of Medicinal Products, Bulgarian Drug Agency Commission for Consumer Protection, Bulgarian Food Safety Agency and other respective authorities to conduct inspections in order to prevent food and medical supplies speculation during the state of emergency. The Supreme Administrative Prosecutor's Office, through the appellate prosecutor's offices, has also carried out joint inspections with the regional health inspectorates, the National Revenue Agency, the Ministry of the Interior and the territorial units of the Bulgarian Food Safety Agency with the same focus.

No specific measures have been taken by the Prosecutor's Office to fight corruption and other forms of crime during the state of emergency, crisis response and recovery..

*Please outline actions required to ensure or improve the implementation of the commitments contained in paragraph 22 of resolution 9/1, as well as any challenges faced or technical assistance required.*