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Turin, 23-24 November 2026

Responses from the Supreme Administrative Court of the Republic of Bulgaria

This questionnaire has been prepared in anticipation of the seminar to be held in

Technological challenges, with particular attention being paid to the introduction of digital technology and artificial intelligence into the organisation of the administration and administrative justice

QUESTIONNAIRE

Turin on 23 and 24 November 2026. In accordance with point 2 of the guiding principles adopted by the Hellenic Presidency of ACA-Europe, it aims to explore the current challenges facing administrative judges, particularly those related to technology, and more specifically the introduction of digitalisation and artificial intelligence into the organisation and functioning of the administration and administrative justice.

In order to gain an in-depth understanding of the various dimensions of these technological challenges, the survey is split into three parts:

Part A - The digitalisation of administrative proceedings, with a focus on the experience of various supreme administrative jurisdictions and the impact of this transformation on the organisation and conduct of judicial activity.

Part B - Automated administrative decision-making and judicial review by administrative courts, particularly issues of technical discretion, automation and the delimitation of judicial powers.

Part C - The role of the administrative judge and the use of artificial intelligence in the performance of judicial functions and in the decision-making process, particularly in light of Regulation (EU) 2024/1689, known as the 'AI Act', as well as other European Union standards and regulations, such as Regulation (EU) 2016/679, known as the 'GDPR', Regulation (EU) 2022/2065, known as the 'DSA', and Regulation (EU) 2022/1925, known as the 'DMA'.

Part A

The digitalisation of administrative proceedings and the use of artificial intelligence

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tools by the administrative justice system

A.I – Infrastructure and technological organisation

A.I.1 – Digital equipment and resources

1. What is the level of digital equipment available to judges and administrative staff?

☐ Non-existent
☐ Limited
☐ Intermediate
x☐ High
x☐ Complete
Please explain if necessary:

2. Is the technological infrastructure (networks, servers, equipment, connectivity) suited to the day-to-day operational needs of the administrative jurisdictions?

☐ Strongly disagree
☐ Somewhat disagree
☐ Neither agree nor disagree
☐ Somewhat agree
x☐ Strongly agree

Please explain if necessary:

The hardware and network equipment currently in use at the Supreme Administrative Court (and at most other administrative courts) is up to date. Over the next three years their parameters will meet the operational needs of judges, including remote court hearings.

A.I.2 – Cloud solutions, remote access and interoperability

3. To what extent does your jurisdiction use cloud-based solutions for its information systems?

x☐ Not at all
☐ To a limited extent
☐ Moderately
☐ Extensively
☐ Completely
Please explain, where applicable, and, in the absence of cloud solutions, specify the alternative infrastructure solutions implemented:

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There are several reasons why cloud solutions are not used. The Supreme Administrative Court (along with the Prosecutor's Office and the Supreme Judicial Council) has two data centres, both of which are located in Sofia. The court's information systems are installed in these centres, with one serving as the main centre and the other as a backup. Other important reason is related to the nature of the court's work and the accepted practice of storing data in its own storage facilities rather than in an external cloud.

3a. Do the adopted technical solutions enable judges and staff to perform their duties remotely using the institutional equipment made available to them? If so, please specify any limitations.

Yes, judges and court staff can perform their duties remotely. They have secure remote access to all key court information systems, and all necessary security measures for remote working have been taken.

3b. Are the applications being used interoperable with other national or cross-border judicial IT systems? If so, please specify the extent of this interoperability.

All administrative courts in Bulgaria use a unified case management information system (EDIS). In this sense, it can be considered national. The system is also linked to the country's unified electronic justice portal (EPEP), enabling the electronic submission of documents, case tracking and electronic summonses, including via the state administration's Secure Electronic Delivery System (SSED).

A.II – Digitalisation and dematerialisation of judicial administrative proceedings

A.II.1 – Dematerialised administrative proceedings

4. Is a dematerialised judicial administrative proceedings system in place within your jurisdiction?

☐ No
☐ Yes, at an initial stage
☐ Yes, at an intermediate stage
x☐ Yes, at an advanced stage
☐ Yes, on a fully integrated basis

Please explain if necessary:

Digital technologies for case management have been implemented. This includes electronic filing systems (e-filing), remote hearings via videoconferencing, and the automated processing of court work.
In terms of digitisation, the court's systems operate using documents that can be electronically signed and submitted in docx and pdf formats. There are no blank forms to fill out, but there is the option of fully electronic submission.

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The same applies to the dematerialisation process, subject to certain conditions. Information systems allow all documents - starting from statements of claim to court decisions, to be created, stored and exchanged in digital format with relevant legal validity (e.g. electronic signatures). Despite this technological capability of the Supreme Administrative Court and other administrative courts in Bulgaria, physical information in paper form has not yet been eliminated.

4a. When this system exists at least at an initial stage, do judges and staff process and sign documents exclusively in digital format in their everyday working practice?

x☐ Never
☐ Rarely
☐ Occasionally
☐ Frequently
☐ Always
Please explain if necessary:

The updated version of the information system for administrative court cases, including those of the Supreme Administrative Court of Bulgaria, will very soon allow documents to be digitally signed electronically.

4b. Percentage of paper files prior to the implementation of dematerialised administrative proceedings that have been digitised:

☐ 0–20%

☐ 20–40%

☐ 40–65%

☐ 60–80%

☐ 80–100%

Currently, the Supreme Administrative Court does not have statistics on the number of paper files that have been digitised. However, all documents held by the court are scanned and stored digitally in its information systems. These systems provide the technological capability to create and use fully digital documents.

A.II.2 – Digital services for members of the public, lawyers and public authorities
5. Are digital services available for filing documents, consulting files, notifications, payments or other related services? If so, please specify which ones.

Yes, as described above.

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Enquiries are made via the unified case management system (EDIS), while citizens and administrations are given the opportunity to submit enquiries via the court's public website.
Notifications and summonses are carried out via the SSEC.
The SAC provides various payment methods. The introduction of virtual POS via the internet in all administrative courts is underway.
Also, with funding from the National Recovery and Resilience Plan, the Supreme Administrative Court is implementing a project entitled 'Digitisation of key judicial processes in the administrative justice system'. The project's primary goal is to optimise the work of magistrates and court officials within the administrative justice system by introducing digital technologies into its processes.
These objectives are directly related to the accompanying measures that support the implementation of reforms identified as a priority for the Republic of Bulgaria, in line with national and European guidelines and strategies. The project will support the digitisation process, contribute to environmental efficiency and protection policies, and help magistrates and court officials to acquire and improve their skills.
This investment aims to increase digitisation in administrative courts by modernising the Unified Case Management and Information System.
This will enable new system functionalities, including serving summonses by email, providing citizens with remote access to documents and the option to submit them electronically, and conducting remote court hearings in the 28 administrative courts and the SAC. The project involves investing in and commissioning data storage hardware in a data centre.
The main results to be achieved through implementation of the investment will be:
- optimisation of the work of magistrates and court officials in the administrative justice system by developing the skills and knowledge of magistrates and court officials, and by introducing new digital processes. This will lead to an improved service for citizens and businesses;
- improving the business environment by ensuring a judicial process that is significantly more independent of extraordinary circumstances. Together with electronic summonses and the possibility of submitting electronic documents, this should lead to an even faster process;
- improved services for citizens and businesses, providing the option to conduct remote open court hearings and submit and receive documents electronically;
- facilitating summonses and notifications in administrative cases by introducing an electronic summons and notification system.

6. Do these digital services guarantee an adequate level of accessibility for people with disabilities?

x☐ 0–20%

☐ 20–40%

☐ 40–65%

☐ 60–80%

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☐ 80 - 100%

6. Do these digital services guarantee an adequate level of accessibility for people with disabilities?

With the exception of the court's public website, the use of these services is not designed to be carried out by persons with disabilities.

7. Are lawyers involved in the design, development and implementation of digital platforms and tools intended for their use?
If so, please specify the terms of this involvement.

No, there is no legal requirement. Lawyers are parties to the proceedings, and they comply with national platforms and established identification technologies when working with the systems. These technologies are also used in court to enable the parties to identify themselves and perform their tasks in accordance with their role in the proceedings.

8. Are there any support and training measures in place for users outside the court system (lawyers, members of the public, government agencies) regarding the use of the digital tools available to them?
□ YES

x□ NO

If so, please specify which ones

A.III – Security of information systems and data protection

A.III.1 – Compliance with the regulatory framework

9. Do your jurisdiction's information systems comply with European and national standards on security, data protection and digital preservation?

☐ Strongly disagree
☐ Agree only slightly
☐ Indifferent
☐ Somewhat agree
x☐ Strongly agree

Please explain if necessary:

A.III.2 – Incident management and business continuity

10. Are IT security incidents dealt with promptly and effectively?
☐ Never

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☐ Rarely
☐ Occasionally
☐ Frequently
x☐ Always

11. Are business continuity and disaster recovery plans regularly updated and tested?

☐ Never
☐ Rarely
x☐ Occasionally
☐ Frequently
☐ Always

A.III.3 – Publicity and dissemination of court decisions

12. Are court decisions available online in their entirety?

☐ Never
☐ Rarely (only for the most significant decisions)
☐ Occasionally
x☐ Frequently
☐ Always

Please add any additional information and explain if necessary:

13. Where a system for publishing decisions online is in place, is there an internal policy to ensure the protection of personal data and respect for the right to be forgotten?

☐ No
☐ No formalised policy; anonymisation is carried out by the registry services on a case-by-case basis
☐ No formalised policy; anonymisation is decided on a case-by-case basis on the instructions of judges
☐ Yes, personal data are systematically anonymised
x☐ Yes, personal data are anonymised in accordance with an internal policy providing for targeted exceptions
☐ Other (please specify)

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A.IV – Training and digital skills

14. Does your jurisdiction offer structured and regularly updated digital technology training courses for judges and staff?

Not very often

If so, please specify which ones.

A.V – Involvement of judges in digital transformation

15. To what extent are judges involved in decision-making and design processes relating to technological innovation and digital transformation in the judiciary? If applicable, please provide details.

To some extent.

A.VI – Use of AI systems in administrative justice

A.VI.1 – Tools and level of deployment

16. Are artificial intelligence systems currently used to assist in judicial or administrative activities?

16a. If so, which ones are used? (Please tick all that apply)

☐ Chatbots

☐ Semantic search tools

☐ Automated anonymisation of decisions

☐ Text analysis and assistance with legal research

☐ Tools to assist with organisation and court management

☐ Other (please specify)

No.

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16b. Overall level of internal deployment of AI systems:

☐ **Occasional or isolated use**
☐ Trial phase
☐ Development phase
☐ Widespread use
☐ Full integration

Please explain if necessary:

A.VII – Governance, regulation and ethical framework for AI

A.VII.1 – Internal guidelines and regulatory compliance

17. Has your jurisdiction adopted any internal guidelines, charters or policies governing the use of AI systems, in particular in application of Regulation (EU) 2024/1689 (the AI Act), the GDPR and other relevant European instruments?

X□ YES

□ NO

If so, please specify which ones.

The Supreme Administrative Court has approved and adopted internal rules for deleting personal data from court documents and publications on its website, or intended for publication in the State Gazette. These rules cover the procedure for erasing personal data as defined in Article 4(1) of Regulation (EU) 2016/679 of the European parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation). Personal data in court acts and protocols is deleted interactively before publication on the Supreme Administrative Court's website, using a special module that does not alter the original text of the document proposed for anonymisation.

18. Are AI systems subject to prior risk assessments?
x□ YES

□ NO

If so, please specify the terms of these assessments

Yes, but artificial intelligence solutions have yet to be implemented in administrative justice.

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19. Are there specific requirements in terms of transparency for the use of AI systems? If so, please provide details.

20. Is the use of AI systems accompanied by human oversight mechanisms?

x□ YES

□ NO

If so, please provide details

Yes, human oversight is required, and decisions must be made by a judge or judicial panel.

21. Are specific methodologies implemented during the design, development and deployment of AI systems to ensure their traceability, reliability, integrity and accuracy? If so, please provide details.

Currently, artificial intelligence is not designed for use in the administrative justice.

A.VIII – Innovation, prospects and future needs

A.VIII.1 – Current innovation projects

22. Are there any innovation projects currently under way in the following areas? (please tick all that apply)

☐ Process automation
☐ System interoperability
x☐ Modernisation of existing systems
x☐ Advanced digital services for external users
☐ AI systems
☐ Other (please specify)

A.VIII.2 – Barriers to digital transformation

23 What do you consider to be the main barriers to the digital transformation of administrative justice? (please tick all that apply)

☐ Complexity of the regulatory framework
x☐ Insufficient financial resources

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x☐ Lack of specialised human resources
x☐ Organisational complexity
x☐ Resistance to change and digital skills gap
☐ Cybersecurity risks and challenges
☐ Other (please specify)

A.VIII.3 – Investment priorities

24. What do you think should be the priority areas for investment over the next few years? (please tick all that apply)

x☐ Modernisation of infrastructure
x☐ Cybersecurity
x☐ Training and skills development
x☐ Deployment of AI systems
x☐ Interoperability at European level
x☐ Complete digitalisation of administrative procedures
☐ Other (please specify)

25. Please describe one or more good practices in digitalisation that have been implemented or are planned within your jurisdiction.

Part B
Automated administrative decisions and judicial review

B.I – Automated administrative decisions: substantive legality and procedure

1. Are there provisions in your legal system that authorise public administrations to use digital or algorithmic technologies in the exercise of their powers?

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x□ YES

□ NO

If so:

1.a. According to these provisions, what are the authorised tools and the objectives pursued by their use?

Generally, In Bulgaria the evolution of digitalisation started in 2018 with the amendments to the Administrative Procedure Code, which first introduced the possibility of electronic filing of requests before administrative authorities.
A significant change occurred with the amendments adopted in August 2025, to be in force on 1 July 2026. This marked a decisive step towards full digitalisation. Key highlights include:
- Mandatory electronic case files (e-dossiers): from 1 July 2026, administrative bodies must open and maintain an electronic file for every proceeding, regardless of how it was initiated. Parties will have access to the e-dossier throughout the proceedings.
- Electronic filing will be mandatory for institutions and professionals, while citizens will still have the option to file on paper or electronically. However, administrative authorities, judicial authorities, the ombudsman, public service organisations and lawyers participating in proceedings will be required to file electronically.
New rules on electronic service mean that documents will be served through the Secure Electronic Delivery System. Electronic logs will provide legal proof of transmission and receipt. If a document is not downloaded within seven days, it will be deemed duly served.
It is important to note that the delayed entry into force (almost one year after promulgation) is intended to allow both businesses and administrative bodies time to adapt their systems, procure the necessary hardware and software, and reorganise their internal processes.

1.b. What types of acts can be adopted using these technologies?
In particular, is the use of algorithms permitted for the adoption of administrative decisions involving discretionary powers?

2. Are there provisions in your legal system governing the design, deployment and use of artificial intelligence systems employed by public administrations?

□ YES

□ NO

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If so,

Comment:
I. At present, the draft law on the use and development of artificial intelligence (51-554-01-183/08.10.2025) is available to view at https://www.parliament.bg/bg/bills/ID/166661. The subject matter of the draft law is set out in Article 1 and states that it regulates public relations in connection with the use and development of artificial intelligence, including:
1. the introduction of measures for the implementation of Regulation (EU) 2024/1689 of the European Parliament and of the Council of 13 June 2024, which lays down harmonised rules on artificial intelligence and amending Regulations (EC) No 300/2008, (EU) No 167/2013, (EU) No 168/2013, (EU) 2018/858, (EU) 2018/1139 and (EU) 2019/2144, as well as Directives 2014/90/EU, (EU) 2016/797 and (EU) 2020/1828;
2. limiting the risks to national security arising from the malicious use of artificial intelligence;
3. developing the skills of workers and employees, including civil servants, in the use of artificial intelligence;
4 the use of AI in the public sector, including for the provision of electronic administrative services;
5. promoting investment in the development and use of artificial intelligence;
6. mitigating risks to children and vulnerable groups arising from the use of artificial intelligence.

II. On 21 November 2025, amendments to the Electronic Communications Act (ECA) of Bulgaria, which implement the EU Digital Services Act (DSA), were published in the State Gazette.
The Communications Regulation Commission (CRC) was designated as the national Digital Services Coordinator and was given responsibility for monitoring compliance with the DSA by all providers of intermediary services, with the exception of video-sharing platforms, which remain under the supervisory authority of the Council for Electronic Media. The Commission for Personal Data Protection is responsible for monitoring advertising based on profiling and protecting minors from targeted advertising, in line with the DSA's requirements for a safer and more transparent online environment.
The amendments empower the CRC to certify out-of-court dispute resolution bodies, award the status of trusted flaggers and vetted researchers, and collect information from a broader range of digital ecosystem actors (DNS providers, hosting companies, cloud services and online platforms, etc.) in Bulgaria. A new procedural regime will apply to inspections, evidence collection, and the application of urgent interim measures to prevent serious harm, including the temporary restriction of access to digital services. Together, these amendments complete the national framework for implementing the DSA in Bulgaria.

III.The digital transformation is a necessary process of technological development of Bulgaria in order to create conditions for innovation and business growth, increase the efficiency of the workforce, a competitive digital economy, and a high citizens' standard. Guided by the strategic goals of our country for accelerated economic development, demographic growth and reduction of social inequalities, set in the "National

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Development Program of Bulgaria 2030", by 2030 Bulgaria should build a functioning and secure environment to unlock the full potential of digital technologies for the digital transformation of all key sectors, reaching the average European values under the Digital Economy and Society Index DESI (digital_transformation_of_bulgaria_for_the_period_2020-2030_f.pdf).

2.a. what type of implementation measures are these? (for example, legislative or soft law):

2.b. Is there an obligation for public administrations to inform the public or individuals about the use of AI systems?

2.c. Are any authorities or bodies responsible for developing general rules or standards for the use of artificial intelligence within public administrations?

3. What conditions must be met to ensure the legality of administrative procedures involving the use of artificial intelligence systems?

In particular:

3.a. Is the decision-making administration required to indicate the type of algorithmic system used and its principal characteristics?

3.b. At what stage of the procedure must the administration provide information about the use of an algorithmic system and its characteristics?

3.c. Does the interested party have the opportunity to comment on or challenge the use or operation of the AI system before the final decision is made?

4. Are specific areas of administrative law in your country subject to express authorisation for the use of administrative decisions based on artificial intelligence systems?

5. Are there specific areas of administrative law in which the use of artificial intelligence systems for issuing administrative decisions is expressly prohibited?

B.II – Judicial review of automated administrative decisions

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6. Does national case-law recognise the legality of automated administrative decisions?

□ YES

□ **NO**

Please explain if necessary:

If so:

6.a. What principles and conditions have been identified by national case-law as necessary for these decisions to be legally valid?

6.b. Have any limitations been identified with regard to the possibility of delegating the administration's decision-making power to algorithmic systems?

6.c. In particular, which of the following principles must be respected, according to national case-law, when adopting an automated administrative decision? (Please tick all that apply)

□ Principle of transparency
□ Principle of non-exclusivity of human intervention ('human in the loop')
□ Principle of non-discrimination
□ Principle of knowledge and comprehensibility of algorithmic functioning
□ Principle of attributing the decision to an authority vested with power
□ Other (please specify)

7. Has national case-law ruled on the nature and legal classification of the algorithm or AI system used for administrative decision-making?

8. What are the limits of the judicial review that administrative judges can exercise over automated administrative decisions?

9. According to national case-law, is the right of access to the algorithmic process that led to the automated administrative decision recognised?

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□ YES
□ NO

If so:
9.a. What information relating to the AI system (data, logic, key parameters) must be made available to the party concerned?

Part C
Administrative judges and the use of artificial intelligence in the performance of judicial functions and in the decision-making process, in light of Regulation (EU) 2024/1689 (the 'AI Act') and other European Union standards and regulations, such as the GDPR, the DSA, the DMA, etc.

1. Does your country recognise, at constitutional level, principles that expressly refer to the use of artificial intelligence in the performance of judicial functions?

□ YES

x□ NO

If so, please specify which ones

2. Has your country adopted or is it in the process of adopting national measures to implement Regulation (EU) 2024/1689 (the AI Act) concerning the use of artificial intelligence to support judicial decision-making, which is classified as a 'high-risk' activity (Annex III, point 8(a))?

□ YES

x□ NO

If so:

2.a. What is the nature of these measures (legislative, regulatory, guidelines, soft-law instruments)?

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2.b. For what purposes is the use of AI permitted? (Please tick all that apply)

□ Research and interpretation of the law

□ Research and assessment of the facts

□ Application of the law to a specific factual situation

□ Administrative activities that are purely ancillary (recital 61 of Regulation (EU) 2024/1689)

Please explain if necessary:

2.c. What measures are taken to ensure human oversight (Article 14 of Regulation (EU) 2024/1689)? In particular, under what conditions is the user able to ignore, cancel or override the result produced by the artificial intelligence system (Article 14(4)(d) of the AI Act), or to suspend or interrupt its use (Article 14(4)(d) of the AI Act)?

2.d. What regulatory measures have been adopted to ensure the transparency, accuracy and robustness of the artificial intelligence system used (Articles 13 and 15 of Regulation (EU) 2024/1689 – the AI Act)?

3. Are there any official forms of testing or use of artificial intelligence systems for decision-making or generating judicial decisions currently in place in your country?

□ YES

□ NO

Please explain if necessary:

If so:

3.a What do they consist of?

3.b. What data sets are used?

3.c. Is the software used publicly owned or provided by private operators?

3.d. Have any biases been identified in its operation? If so, what kind?

4. Are measures planned in your country to ensure a sufficient level of artificial intelligence literacy specifically for judges (Article 4 of Regulation (EU) 2024/1689)?

x□ YES

□ NO

If so:

Magistrates have the opportunity to participate in training seminars on the application of artificial intelligence. These courses are typically designed for lawyers and legal experts who wish to gain an understanding of artificial intelligence in technical and legal contexts, the new obligations and responsibilities under the AI Act, and the risks and opportunities that the regulation brings to business, public administration and society. Analysis of training courses offered at the national and EU levels shows that they most often include a combination of legal considerations, technological fundamentals and practical guidelines, focusing on contracts, personal data protection, copyright and the implementation of AI systems.

4.a. What do these measures consist of?

4.b. Is specific training planned to prevent or limit the phenomenon known as 'automation bias' (Article 14(4)(b) of the AI Act)?

□ YES

x□ NO

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Please explain if necessary:

5. Is the use of generative or agentic artificial intelligence systems permitted in your country to assist in the drafting of procedural documents or court decisions?

To help you understand the question better: **generative artificial intelligence (AI)** is a category of AI models which, thanks to machine learning and training on vast amounts of data, are capable of creating original content (text, images, videos, music, etc.). **Agentic AI** is described as a system capable of autonomously planning, making decisions and executing complex tasks with minimal human intervention to achieve a defined objective [source: OECD].

6. Has the national case law of your country addressed issues concerning the interpretation and application of EU Regulation 2024/1689?

□ YES

x□ NO

Please explain if necessary:

To date, Bulgarian case law has not addressed issues concerning the interpretation or application of EU Regulation 2024/1689.

6.a. If yes, which principles have been established?

7. Have national courts of your country submitted preliminary rulings to the Court of Justice of the European Union regarding EU Regulation 2024/1689?

□ YES

x□ NO

Please explain if necessary:

To date, Bulgarian case law has not submitted any preliminary rulings to the Court of Justice of the European Union regarding EU Regulation 2024/1689.

7.a. If yes, which questions were referred? What answers has the Court of Justice of the European Union provided?

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