

17 November 2025

Dear Mr. Donchev, Deputy Prime Minister, and Mrs. Petkova, Minister of Finance,

We, the undersigned civil society organisations, submit the attached Report on Barriers to CSO Participation in EU-Funded Programmes in Bulgaria (2021–2027), endorsed by 11 CSOs. The report documents two national-level practices - the restrictive application of the *de minimis* (state aid) regime and the effective elimination of advance payments for CSOs - that are not required by EU law but significantly curtail fair participation, depress competition in open calls, and slow implementation.

1) **De minimis.** Bulgaria's current approach treats non-economic, public-benefit activities (education, inclusion, community work, rights) as market activities, capping CSO participation over a three-year period. At the EU level, such non-market activities are exempt from state aid rules; Commission representatives have indicated that applying *de minimis* here is unjustified and avoidable. We ask you to formally recognise these activities as non-economic, harmonise practice across all programmes, and, if needed, use the partial PO approach (limiting *de minimis* to staff/operational costs) as a temporary measure.

2) **Advance payments.** Since 2022, advances to CSOs have been effectively withdrawn unless backed by full bank guarantees or insurance, terms that most CSOs cannot meet. This creates cash-flow barriers, delays projects, and results in unequal treatment versus public bodies that still receive advances. We ask you to reinstate advances of at least 20%, reintroduce promissory notes ("запис на заповед") as acceptable security, and monitor access and treatment across programmes.

These issues are matters of political choice, not EU regulatory constraint. We urge coordinated action by the Managing Authorities and the Ministry of Finance, with renewed commitment to the Partnership Principle and the Code of Conduct on Partnership under the Common Provisions Regulation. Addressing them will enhance effectiveness, ensure equal access, and help EU resources reach the communities that need them most.

Attachments to the letter:

1. *Report on Barriers to CSO Participation in EU-Funded Programmes in Bulgaria — Findings and Recommendations*
2. *Report on Good Practices in CSO Involvement by Managing Authorities* (for reference)





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Respectfully,

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[CEDAR Foundation](#)

[CONCORDIA Bulgaria](#)

[Equilibrium](#)

[Eurochild](#)

[Integro](#)

[Karin Dom](#)

[Know-How Centre for Alternative Child Care](#)

[National Network for Children](#)

[Radost Foundation](#)

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