

Joint contribution to the European Affordable Housing Plan call for evidence

This contribution is part of the implementation of Tanya's Dream Fund (TDF) project "Leveraging EU influence to deliver change for families in adversity in Bulgaria", led by Eurochild. The project aims to strengthen the prevention of child-family separation in Bulgaria by empowering civil society and influencing national policies. The project supports EU-level monitoring of the Child Guarantee – for example, advocating for disaggregated data on ethnicity - and works to equip policymakers and civil servants to redirect funding towards inclusive, community-based prevention measures. It also monitors the use of EU funds and gathers evidence to build accountability, while ensuring Bulgarian partners remain informed and engaged with EU-level developments relevant to families facing adversity, particularly Roma families.

As representatives of civil society organisations and the academic sector working with and for children in Bulgaria, we would like to contribute evidence to the ongoing call for the European Affordable Housing Plan and underscore the potential for synergies between this initiative and existing frameworks, particularly the European Child Guarantee (ECG). Specifically, the Bulgarian ECG National Action Plan (NAP)¹ identifies critical housing challenges affecting children from vulnerable groups, including who are raised by single parents, and children with a migrant and ethnic background, including Roma children.

According to Bulgaria's NAP, these groups often experience severe housing deprivation, overcrowding, and limited access to essential sanitation and hygiene infrastructure. A significant identified barrier is the lack of targeted housing policies and concrete measures specifically supporting families with children.

The NAP proposes addressing this gap through the development of a comprehensive National Housing Strategy and targeted programs that offer direct assistance to vulnerable households for necessary housing adaptations. However, according to Bulgaria's first biennial report,² such a strategy has not been developed, and no significant measures have been taken to address improving the housing situation for the most vulnerable children.

We strongly believe that aligning the European Affordable Housing Plan with the ECG framework will significantly enhance outcomes for vulnerable children and their families through more effective and integrated support. This alignment should be prioritised within other key upcoming policy and funding opportunities, including the EU Anti-Racism Strategy, the EU Anti-Poverty Strategy, and the new Action Plan of the European Pillar on Social Rights, the 2028-2034 Multiannual Financial Framework (MFF)³, the future European Social Fund Plus (ESF+), and the European Regional Development Fund (ERDF).

In this context, we urge the European Commission to consider these insights and integrate targeted measures and synergies with existing national commitments within the final formulation of the European Affordable Housing Plan.

Concretely, we would like to inform the Plan with the following evidence:

Poverty and Inequality

- According to data from Eurostat, in 2024, Bulgaria had the highest proportion of children at risk of poverty or social exclusion in the EU, 35.1%. However, this risk is not equally distributed.
- In 2023, the relative share of children with material deprivation (defined as lacking at least 1 of 13 indicators) varied significantly by ethnic background:

¹ Republic of Bulgaria. (2022). *Action Plan for Implementation of the Council Recommendation (EU) 2021/1004 Establishing a European Child Guarantee (2030)*. European Commission.

² Republic of Bulgaria. (2023). *Report on the implementation of the Council Recommendation (EU) 2021/1004 establishing a European Child Guarantee*. European Commission.

³ Eurochild. (2025, April). *Securing Europe's Future: Eurochild's Vision for Investing in Children in the 2028–2034 EU Multiannual Financial Framework*.

- 20.6% of the Bulgarian ethnic group,
- 29.9% of the Turkish ethnic group,
- 77% of the Roma ethnic group.

None of the needs can be provided for 0.9% of the Bulgarian ethnic group, for 0.8% of the Turkish ethnic group and for 5.3% of the Roma ethnic group.⁴

Housing Conditions

- Bulgaria is among the countries with overcrowding rates exceeding 50%⁵.
- The situation becomes even more severe for Roma communities. Roma people face severe housing inequalities, as highlighted by the stark contrast with the general population: 43.5% live in poor housing conditions compared to 8.6% overall, and 76.9% experience overcrowded housing, nearly double the rate (39.5%) of the general population.⁶

Informal settlements

- In Bulgaria, informal settlements are primarily the result of poverty, social exclusion, and the lack of affordable housing or regulated land for construction. These communities have long suffered from chronic deprivation and institutional neglect.
- A large proportion of households live in homes without any legal status or ownership documentation, particularly in neighbourhoods with predominantly Roma populations like “Nadezhda” in Sliven. This legal limbo places residents at constant risk of eviction and denies municipalities property taxes and maintenance funding. The resulting cycle makes state intervention and improvements nearly impossible.
- According to research done in 2020 in Sliven and Targovishte neighbourhoods with predominantly Roma populations, there is an extremely strong desire for homes to be legalised. Approximately 40% of households would legalise their home even if it involved significant costs.⁷

Lack of Affordable and Social Housing

- In Sofia, the number of available social housing units fell from 120,000 in 1993 to fewer than 9,000 in 2021.⁸

⁴ National Network for Children. (2025). *Beleznik 2025: What is the average grade of the state in caring for children?* Sofia, Bulgaria: National Network for Children.

⁵ Fondation Abbé Pierre & FEANTSA. (2024). Ninth overview of housing exclusion in Europe.

⁶ Network of Independent Experts-NIE Association. (2025). Fundamental rights violations in EU funds in Bulgaria: National research report – Bulgaria. Published in April 2025.

⁷ Habitat for Humanity Bulgaria. (2022). *Housing Conditions in Neighbourhoods with Concentrated Poverty and Policies for Their Improvement*. Sofia, Bulgaria: Habitat for Humanity Bulgaria, p.8

⁸ Krustev, S., Kratunkova, R., Venkov, N., Tsoneva, Zh., Popova, M., & Giacomo, S. (2022). *A Home for Everyone: Mission (Im)Possible? Housing Policies in Bulgaria for the Most Vulnerable*. Médecins du Monde – Sliven Branch, with support from Fondation Abbé Pierre., p. 9

- As of December 31, 2022, municipal housing in Bulgaria represents only 0.7% of the total housing stock, amounting to 32,225 units nationwide. This figure has been steadily declining⁹, primarily due to the legal right of tenants to purchase their dwellings, which gradually reduces the availability of public housing. The existing stock is characterised by significant age and depreciation, which leaves many units in disrepair and offered at rents approximately ten times lower than market rates. These low rental incomes are insufficient to finance major renovations, further exacerbating the degradation of the housing stock. Alarming, a survey reveals that 10% of municipal housing is in such poor condition that it is deemed unsafe for accommodating people in housing need.¹⁰
- Bulgaria experienced one of the most significant increases in house prices in the EU (+16.5%) in the third quarter of 2024¹¹, despite a 15% increase in the number of empty houses. According to census data, 31,7% of housing was declared empty in 2011, rising to 39% in 2021.¹²

Lack of a National Housing Strategy and coordination

- Bulgaria does not explicitly recognise the right to housing as a standalone constitutional or statutory right. However, certain legal provisions—such as the inviolability of the home (Art. 33 of the Constitution) and protections of private property (Art. 17)—offer indirect safeguards.
- Moreover, Bulgaria has not ratified Article 31 of the Revised European Social Charter, which outlines the right to housing. This legal gap highlights the need for stronger normative recognition of housing as a fundamental social right, particularly for vulnerable groups.
- The country does not have a national housing policy regulated in a strategic document, nor does it have unified legislation regulating public relations related to housing provision.¹³ A [draft](#) for a National Housing Strategy was developed in 2017 but has not been endorsed by the Government since.
- Municipalities are solely responsible for the management of social housing. However, they mostly rely on their own resources to maintain the housing stock, which in practice performs social functions. There is no legal and strategic framework to regulate social housing in the country, and the need for one has been expressed by almost all municipalities.¹⁴

⁹ Krustev, S., et al, *A Home for Everyone*, p. 26

¹⁰ Habitat for Humanity Bulgaria. (2023). *Report: Results and recommendations from an online survey among Bulgarian municipalities on social housing policy*. Sofia, Bulgaria: Habitat for Humanity Bulgaria.

¹¹ Eurostat. (n.d.). Housing price statistics - house price index. European Commission. Retrieved April 1, 2025

¹² Habitat for Humanity Bulgaria. (2023) Report: Results and recommendations

¹³ Habitat for Humanity Bulgaria. (2023) Report: Results and recommendations

¹⁴ Habitat for Humanity Bulgaria and MRDPW, Report on Social Housing Policy

- Bulgaria needs a clearer definition of social housing to enable better funding, amendments in the Territorial Law for housing unit construction criteria, and improved transparency in the Municipal Housing Fund and Municipal Property Law.¹⁵

Forced Evictions

- Despite a 2015 European Court of Human Rights ruling prohibiting the demolition of homes without providing alternatives, forced evictions continue in Bulgaria in 2025, particularly affecting Roma communities, such as in the recent case in Zaharna Fabrika¹⁶. While the 2015 European Court of Human Rights ruling sets an important legal precedent and is binding in the specific case, it does not by itself amend national legislation. For systemic change, its principles must be reflected in domestic legal reforms and consistently applied by national courts and authorities.
- Since November 2012, the power to issue orders for the removal of illegal constructions in Bulgaria has been transferred to municipal mayors. However, no national records or statistics have been collected on these administrative actions. In 2016, the Equal Opportunities Initiative gathered data by submitting requests for demolition orders under the Access to Information Act to all 265 municipalities mayors in Bulgaria. Of the 162 municipalities that responded, 114 reported issuing demolition orders for illegal structures between December 2012 and March 2016. Of the 2,000 orders identified, 444 concerned residential buildings, and of these, 399 (90%) affected the homes of Roma families. When the Roma houses were demolished, no alternative accommodation was provided to the occupants, leaving the families homeless.
- Forced evictions have continued beyond this period, and no legislative changes have been made to introduce the principles of necessity and proportionality in evictions from individuals' only homes. These measures disproportionately affect Roma living in housing that is formally illegal. In 2019-2020, hundreds of Roma, including children, the elderly, and people with disabilities, were evicted from their only homes without being provided with alternative accommodation¹⁷.
- A thematic study by the international NGO Medecins du Monde in 2022¹⁸ highlighted several issues related to the planning and construction of municipal housing: an overreliance on European funding under operational programmes; the postponement of social housing projects; the reluctance of many local communities to accept social housing due to the target beneficiaries being Roma; the impossibility of organising additional obligatory social services to be provided to beneficiaries; and the maintenance of buildings are among the key challenges identified.

¹⁵ Eurochild. (2025). *Advancing the Implementation of the European Child Guarantee in Bulgaria: Position Paper*. Eurochild.

¹⁶ Eurochild. (2025, April 25). *Forced evictions in Sofia threaten Roma children's rights*.

¹⁷ Tomova, I., & Stoychev, L. (2022). *Thematic report on the situation of Roma: Key indicators for social inclusion and fundamental rights in Bulgaria*.

¹⁸ Krüster, S., et al., *A Home for Everyone*

- In 2016, the Sofia Municipality issued an order for the removal of illegally constructed buildings on municipal land. In 2020, the then-mayor revoked the administrative address of the settlement, and the Ministry of Regional Development and Public Works cancelled more than 700 Roma address registrations. As a result, the number of officially registered Roma residents in the settlement is now significantly lower. In April 2025, a large-scale operation took place in Sofia's Zaharna Fabrika neighbourhood to demolish illegal dwellings inhabited by Roma families. Among those affected were children, elderly people, pregnant women, and people with disabilities.
- The demolition sparked serious criticism because it was carried out despite a ruling by the European Court of Human Rights (ECHR) on April 11, which prohibited the destruction of the dwellings without providing alternative housing. Nevertheless, the local administration proceeded with the actions, leaving most of the affected families homeless.
- In response, the Roma community organised protests, including blockades of Slivnitsa Boulevard and a tent camp in front of the "Ilinden" district administration. Protesters demanded suitable housing and social support.
- Local and international organisations expressed concern over the violation of the rights of the affected families and called on the Bulgarian authorities to take urgent measures to provide shelter and assistance.
- In May, the [National Network for Children](#) sent an official letter with an appeal for an immediate response from the State Agency for Child Protection to react urgently to the situation, to send psychologists trained in crisis response to provide support and ensure the protection of children's rights.
- As of the end of May 2025, many of the displaced families continue to live in precarious conditions.

Housing and Environmental Challenges

- Bulgaria suffers from poor air quality, holding the highest premature death rate from particulate matter as recorded in 2021, particularly affecting communities living in substandard housing.¹⁹
- It is worth noting that most of Bulgaria's housing -related measures are focused on lowering energy poverty. There is even a specific strategy addressing energy poverty and the Recovery and Resilience Plan (RRP) targets this issue directly. . However, recent studies show that energy poverty and general poverty (measured by income levels) are not the same issues in Bulgaria. People with relatively stable incomes can still be considered energy poor. While the issues appear to be similar, they should not be conflated.²⁰

¹⁹Organisation for Economic Co-operation and Development (OECD) & European Commission. (2024). [Health at a Glance: Europe 2024 – State of Health in the EU Cycle](#). OECD Publishing.

²⁰ Bulgarian Academy of Sciences. (2025, March 7). [Economists from BAS: Energy efficiency measures should consider territorial differences and household vulnerability](#).

Although Bulgaria lacks a significant number of best practices in the formalisation of informal housing and spatially isolated neighbourhoods, one initiative stands out as both innovative and successful, offering a valuable model for future replication.

- The Trust for Social Achievement in Bulgaria has developed a pragmatic, community-driven model for improving housing security. Implemented in several Bulgarian municipalities, the model works by facilitating zoning and regulation/legalisation of informal neighbourhoods, supporting local authorities in issuing forbearance certificates (as interim legal protections), and empowering communities to participate in planning processes.
- The Housing First model, successfully implemented in Member States such as Czechia, Finland and Slovakia, prioritises providing immediate, permanent housing to people experiencing homelessness, without requiring them to first address issues such as addiction or unemployment. Once housed, individuals receive tailored support services to help them stabilise and reintegrate. This approach has proven highly effective in reducing long-term homelessness in Finland and is widely recognised as a sustainable, dignity-centred model.

Recommendations to the EU Affordable and Sustainable Housing Plan – Aligned with the EU Child Guarantee

- **Embed Zoning and Planning Inclusion as a Child-Centred Strategy**
Prioritise inclusive urban and regional planning to prevent the spatial segregation of Roma and other marginalised families. Ensure zoning policies actively support the development of socially integrated neighbourhoods with guaranteed access to essential services for children, such as early childhood education and care, education, healthcare, and nutrition, in line with the Child Guarantee's goal of ending housing exclusion and segregation.
- **Enable Access to Financing for Underserved Communities**
Expand EU support for financing mechanisms, such as municipal investment funds, that are tailored to reach informal settlements and families without formal housing status. This will enhance access to safe and adequate housing for children currently growing up in insecure or unsafe conditions.
- **Promote Integrated, Community-Led Housing Solutions**
Facilitate structured knowledge exchange and technical assistance to Member States and local authorities implementing participatory housing models. Prioritise approaches that involve families, address intergenerational poverty, and ensure safe, child-friendly living environments.
- **Ensure Social Housing Policy Reaches Legally Invisible and Market-Excluded Families**
Mandate that social housing frameworks explicitly recognise and serve families living in informal housing or without residence registration, conditions that currently exclude many children from education, healthcare, and other rights protected under the Child Guarantee.

- **Adapt EU Funding Instruments to Include Spatially Isolated Neighbourhoods**
Revise funding eligibility criteria to allow targeted investments in isolated or informal Roma neighbourhoods. Respect the right of families to choose where they live, while ensuring access to public infrastructure, services, and child development opportunities.
- **Integrate the Housing First Model for Families with Complex Needs**
Apply the Housing First model—pioneered in Czechia, Finland, Slovakia and other EU Member States —within family-based interventions by:
 - Providing Immediate Access to Permanent Housing without preconditions, supporting the stability and development of children;
 - Offering Wrap-Around Support Services (case management, mental health care, educational support) tailored to families;
 - Focusing on Holistic Well-being, recognising that housing alone is insufficient to break cycles of poverty and exclusion.

For more information on the housing challenges faced by children in Europe, please refer to [Eurochild's extended contribution](#).

List of signatories:

- [Amalipe Center for Interethnic Dialogue and Tolerance](#)
- [Eurochild](#)
- [Integro Association](#)
- [Know-How Centre for the Alternative Care for Children](#)
- [National Network for Children](#)
- [Trust for Social Achievement](#)

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