



European Commission

**DUBRAVKA ŠUICA**  
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Brussels, 2 February 2021

Dear Mr Bogdanov,

I would like to thank you, and your co-signatories, for your open letter of 10 December 2020, on behalf of 70 civil society organisations in Bulgaria. Please accept my apologies for the delay in replying to you. I am replying on behalf of all the members of the European Commission who were addressed in your open letter.

You refer to the submission to the Bulgarian Parliament, on 4 December 2020, of a draft law for the amendment of the Child Protection Act, which, if passed and adopted, would be detrimental in your view, to the Bulgarian child protection legal system and practice. You consider that some of the proposed provisions are contrary to the United Nations Convention on the Rights of the Child, as well as international and European standards.

While the European Commission, as a matter of policy, does not comment on draft laws, I would like to emphasise that EU action on the rights of the child is guided by the EU Charter of Fundamental Rights, which is applicable to EU institutions, and to Member States in the implementation of EU law. All EU policies that have an impact on children should be designed in line with the best interests of the child. EU action in this area is also guided by international human rights standards<sup>1</sup>, such as the UN Convention on the Rights of the Child that all EU Member States have ratified.

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<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52011DC0060>

*Mr George Bogdanov*  
*Executive Director*  
*National Network for Children – Bulgaria*

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While EU Member States are responsible for child protection systems in general, some individual elements of child protection systems are regulated by EU instruments. Moreover, the EU has been promoting the need for a holistic and integrated approach to child protection, to ensure that such systems – and their components – meet the needs of all children. The 2015 European Forum on the rights of the child focussed on coordination and cooperation in integrated child protection systems and proposed 10 principles for integrated child protection systems.

Under the Rights, Equality and Citizenship Programme (2014-2020), the Commission has funded capacity building for judicial authorities and other practitioners (such as child protection professionals) on child-friendly justice and children's rights in alternative care.

This year, the Commission will adopt an EU Strategy on the rights of the child, which will encourage EU Member States to adopt or reinforce strategies and targeted policies on the rights of the child, and will put forward actions to reinforce integrated child protection systems across the European Union.

Thank you for your commitment to the promotion and protection of the rights of the child.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Šuica', written in a cursive style.

Dubravka Šuica