Dublin procedure - Bulgaria

Overview

Content updated and validated on: 27/08/2025

Relevant EU legislation

Bulgaria is bound by the Dublin III Regulation which is directly applicable.

National legislation

Specific provisions on the Dublin procedure can be found in the following national legislation:

- Section 1a of the Law on Asylum and Refugees, in force since 1st December 2002, amended by SG no. 39 of 1st May 2024 | ЗАКОН ЗА УБЕЖИЩЕТО И БЕЖАНЦИТЕ;
- Ordinance no 332 of 28 December 2007 on the responsibility and coordination of the state authorities carrying out administrative cooperation actions in the application of the Dublin regulation and the Eurodac Regulation, amended by SG no. 46/2022, in force since 21 June 2022 | НАРЕДБА ЗА ОТГОВОРНОСТТА И КООРДИНАЦИЯТА НА ДЪРЖАВНИТЕ ОРГАНИ, ОСЪЩЕСТВЯВАЩИ ДЕЙСТВИЯ ПО АДМИНИСТРАТИВНО СЪТРУДНИЧЕСТВО ПРИ ПРИЛАГАНЕТО НА РЕГЛАМЕНТ ДЪБЛИН И РЕГЛАМЕНТ ЕВРОДА.

Competent authority and stakeholders

Entity responsible for the Dublin procedure (the application of the criteria and mechanisms for determining the Member State responsible): Dublin Unit, State Agency for Refugees with the Council of Ministers (SAR) | Отдел „Дъблин“, Държавна агенция за бежанците при Министерския съвет

© European Union Agency for Asylum, 2026. Reproduction is authorised, provided the source is acknowledged.

Place in the institutional framework: The Dublin unit falls within the State Agency for Refugees, which is under the authority of the Council of Ministers.

Competencies of the entity:

No	Conducting the Dublin interview (specifically for the Dublin procedure, as part of the registration interview or handling the form to be completed during registration)
Yes	Organising Dublin transfers
No	Notifying the transfer decision
No	Accompanying/escorting applicants during a Dublin transfer
Yes	Sending and replying to take charge and take back requests to/from other Member States
No	Receiving applicants transferred under the Dublin procedure (meeting applicants at the airport/border crossing)
Yes	Sending and replying to information requests to/from other Member States

Stakeholders involved in the procedure:

Handing over the common leaflet on the Dublin procedure	State Agency for Refugees with the Council of Ministers | Държавна агенция за бежанците при Министерския съвет
Conducting the Dublin interview (specifically for the Dublin procedure, as part of the registration interview or handing the form to be completed during registration)	State Agency for Refugees with the Council of Ministers | Държавна агенция за бежанците при Министерския съвет

© European Union Agency for Asylum, 2026. Reproduction is authorised, provided the source is acknowledged.

Referral of cases to the Dublin unit	State Agency for Refugees with the Council of Ministers | Държавна агенция за бежанците при Министерския съвет Ministry of the Interior | Министерство на вътрешните работи State Agency for National Security | Държавна агенция Национална сигурност
Sending and replying to a take charge or take back request	Dublin Unit, State Agency for Refugees with the Council of Ministers |, Отдел „Дъблин“, Държавна агенция за бежанците при Министерския съвет
Sending and replying to information requests to/from another Member State	Dublin Unit, State Agency for Refugees with the Council of Ministers |, Отдел „Дъблин“, Държавна агенция за бежанците при Министерския съвет
Notification of the transfer decision	State Agency for Refugees with the Council of Ministers | Държавна агенция за бежанците при Министерския съвет
Free legal assistance during the appeal of a transfer decision	Legal assistance and representation can be provided against a transfer decision by state-funded lawyers registered on a list of the National Legal Aid Bureau | Национално бюро за правна помощ and by UNHCR and civil society organisations.
Representation of the asylum authority in an appeal against a transfer decision	State Agency for Refugees with the Council of Ministers | Държавна агенция за бежанците при Министерския съвет

© European Union Agency for Asylum, 2026. Reproduction is authorised, provided the source is acknowledged.

Organising the transfer to the responsible Member State	Dublin Unit, State Agency for Refugees with the Council of Ministers | Отдел „Дъблин“, Държавна агенция за бежанците при Министерския съвет Migration Directorate of the Ministry of the Interior | Дирекция Миграция Border Police | Главна дирекция „Гранична полиция“
Providing information on the transfer modalities to the applicant	State Agency for Refugees with the Council of Ministers | Държавна агенция за бежанците при Министерския съвет
Accompanying/escorting applicants during a Dublin transfer when necessary	Migration Directorate of the Ministry of the Interior | Дирекция Миграция
Receiving applicants transferred under the Dublin procedure (meeting applicants at the airport/border crossing)	Border Police | Главна дирекция „Гранична полиция“
Court/authority responsible for deciding on an appeal against a transfer decision	Administrative Court of Sofia | АДМИНИСТРАТИВЕН СЪД СОФИЯ

Provision of information on the Dublin procedure

The Dublin Unit of the State Agency for Refugees is responsible for providing information on the Dublin procedure. Information is provided before and during

© European Union Agency for Asylum, 2026. Reproduction is authorised, provided the source is acknowledged.

the Dublin interview. Article 67a(4) of the Law on Asylum and Refugees provides that the applicant shall be informed of the initiated proceedings under the Dublin III Regulation and the consequences of it.

The information is provided both orally and in writing, and covers information related to the Dublin procedure, as well as general information about the asylum procedure and the applicant's rights and obligations. The applicant must sign a declaration that he/she was provided with information on his/her rights as an asylum seeker. The applicant is also provided with the common information leaflet in their language, and they must also sign a copy of the leaflet which is kept in their file.

Right to legal counselling

Legal assistance is the same as for the regular procedure, namely the Law on Legal Aid mentions that state-funded legal assistance can be provided at first instance determination and on appeal, upon request and following a means test. Legal assistance and representation can be provided by state-funded lawyers registered in a dedicated list of the National Legal Aid Bureau pursuant to Article 22(8) of the Legal Aid Act and Article 23 of the Law on Asylum and Refugees, by UNHCR and civil society organisations.

In practice, legal assistance has only been provided to unaccompanied minors to facilitate their reunion with family members in another Member State.

Personal interview for determining the Member State responsible

Organisation of the interview: It is not obligatory to conduct a separate interview when the Dublin procedure is initiated. It is up to the interviewer to decide whether an interview is necessary or not in light of all relevant circumstances and evidence, pursuant to Article 67b (2) of the Law on Asylum and Refugees. A separate Dublin interview may be conducted after the registration of the application, combined with the admissibility interview. A full

© European Union Agency for Asylum, 2026. Reproduction is authorised, provided the source is acknowledged.

written transcript, as well as an audio recording of the personal interview, are made, as provided under Article 63a(3) of the Law on Asylum and Refugees. The applicant, a legal advisor or other counsellor representing the applicant have access to the transcript of the interview as soon as possible after the interview. The applicant has the right to make comments which will be written into the transcript. The interview is conducted by the Dublin Unit. The interview is conducted in the reception facility by the case worker who was been assigned with the case.

Persons present during interview: When the Dublin interview is conducted with an unaccompanied child, the representative is present as well. A social worker from the “Social Assistance” Directorate is also present during interviews with children.

Notification of the transfer decision

The State Agency for Refugees (SAR) notifies the applicant about the transfer decision in person in the presence of their advisor/representative and an interpreter. The applicant signs the decision which includes the grounds of the decision, a final date by which the transfer should be carried and instructions for an appeal.

Remedies

Competent authority/court	Administrative Court of Sofia - Article 84 (1) of the Law on Asylum and Refugees No cassation appeal is allowed before the Supreme Administrative Court – Article 85 (3) of the Law on Asylum and Refugees
Deadline for review/appeal	7 days since the receipt of the decision on a Dublin transfer - Article 84 (1) of the Law on Asylum and Refugees
Deadline for decision on the review/appeal	1 month – Article 85 (1) of the Law on Asylum and Refugees

© European Union Agency for Asylum, 2026. Reproduction is authorised, provided the source is acknowledged.

Suspensive effect of the review/appeal	A Dublin appeal does not have an automatic suspensive effect, but the applicant can request it from the court.

Transfer arrangements

The Dublin Unit of the State Agency for Refugees organises the transfer in coordination with the Migration Directorate of the Ministry of Interior and the border police.

When another Member State accepts the responsibility to examine the application of an asylum applicant who is in Bulgaria, the outgoing transfer is implemented within two months on average. For incoming transfers to be organised, the duration of actual implementation on average was 3.5 months in 2023 but can vary up to 15 months. The State Agency for Refugees published a report on the conduct of proceedings for international protection in 2024 and contains detailed information on the application of the Dublin procedure.

Transferred asylum applicants may be detained for up to 7 days before the transfer as a precautionary measure (e.g. to ensure timely boarding on the plane).

The transfer is supervised in all cases. Transfers with an escort are carried out for children under 14, elderly people or other vulnerable persons.

Guarantees for minors in the Dublin procedure

Assessment of the best interests of the child: There is no specific procedure to assess the best interests of the child within the Dublin procedure. The assessment of the best interests of the child is part of the general procedure. For unaccompanied minors, the State Agency for Refugees (SAR) has forms approved for an expeditious determination of the best interest of the child within up to 3 days from registration, and a full determination within up to 10 days in the event of a (high or medium) risk identified in respect of unaccompanied children by a

© European Union Agency for Asylum, 2026. Reproduction is authorised, provided the source is acknowledged.

social expert. The social worker prepares a social report of the applicant, which takes into account the best interests of the child. The social worker is appointed by the State Agency for Child Protection and is not the same person as the guardian/representative.

Legal Guardian: The representative appointed to an unaccompanied minor in the Dublin procedure is the same as the representative within the international protection procedure in general – pursuant to Article 25 of the Law on Asylum and Refugees. The representative takes part in the Dublin personal interview, but he/she is not involved in the assessment of the best interests of the child. The representative is entitled to take care of the unaccompanied minor's legal interests in the proceedings for granting international protection until the decision, to act as a procedural representative in all proceedings before the administrative authorities and take action to provide legal assistance.

Detection of potential family reunification cases: During the registration process, all applicants must inform SAR of their family members, their age and location. As such, SAR is given the opportunity to detect family reunification cases early on and provide the case worker with information whether additional questions during the interview could be asked in order to identify properly a Dublin case.

© European Union Agency for Asylum, 2026. Reproduction is authorised, provided the source is acknowledged.