

# **Coronavirus pandemic in the EU – Fundamental Rights implications**

## **National vaccine deployment**

**Bulgaria**

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# 1 National vaccine deployment – planning and overview of priority groups

Specific groups identified in the national vaccine deployment plan	Date of plan	Date of new/revised plans
	07/12/2020  National Plan for Vaccination against COVID-19  <a href="#"><u>(Национален план за ваксиниране срещу COVID-19)</u></a>	03/02/2021  19/02/2021  22/02/2021  Revised National Plan for Vaccination against COVID-19  <a href="#"><u>(Национален план за ваксиниране срещу COVID-19)</u></a>
<i>older persons; indicate age groups specified</i>	YES  Age group 65+ (4)	No change
<i>persons with underlying health problems</i>	YES  Reference given to persons aged 45-65 with underlying chronic diseases including immunocompromised or persons with secondary immune deficiencies (4)	No change
<i>persons with disabilities</i>	YES  Reference given only to users of social services (2)	No change
<i>key workers (on the basis of their job not their personal characteristics) – e.g. health workers; persons working in care homes; teachers</i>	YES  Reference given to health workers (1), staff of social services (2), teachers (2), staff of milk farms (2), and workers involved in maintaining essential services (3)	YES  Persons directly involved in the organisation and carrying out of the parliamentary elections scheduled for 4 April 2021 introduced as a new group for prioritisation (3)
<i>persons belonging to ethnic/national minorities</i>	NO	No change
<i>persons experiencing homelessness</i>	NO	No change
<i>persons with drug addiction dependencies</i>	NO	No change

<i>persons with low literacy levels</i>	NO	No change
<i>persons deprived of their liberty</i>	NO	No change
<i>persons without residence or with insecure legal status (such as refugees, asylum seekers, and undocumented migrants)</i>	NO	No change
<b><i>OTHER</i></b> – not specified above; e.g. ‘Persons living in crowded accommodation’; etc. Please insert . . .	YES  Reference given to vulnerable groups of the population at high epidemiological risk of infection related to their conditions and way of life (5)	No change

In **Bulgaria**, the national vaccine deployment plan was adopted in December 2020.<sup>1</sup> The implementation of the plan is coordinated by National Vaccination Headquarters (NVH) (*Национален ваксинационен щаб, НВЦ*) chaired by the general director of the Bulgarian Red Cross (BRC) (*Български червен кръст, БЧК*).<sup>2</sup> Since its adoption, the plan was revised three times. The first revision, adopted 3 February 2021, introduced as a new group for prioritisation (under priority phase 3) all persons involved in the organisation and carrying out of the parliamentary elections scheduled for and held on 4 April 2021.<sup>3</sup> The reason for the change was that, at the time when the plan was adopted, the elections were

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<sup>1</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), National Plan for Vaccination against COVID-19 ([Национален план за ваксиниране срещу COVID-19 в Република България](#)), 7 December 2020, last amended 22 February 2021.

<sup>2</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), Decision No 896 of 7 December 2020 for adopting the National Plan for Vaccination against COVID-19 ([Решение № 896 от 7 декември 2021 г. за приемане на Националния план за ваксиниране срещу COVID-19 в Република България](#)), 7 December 2020.

<sup>3</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), Decision No 91 of 3 February 2021 for supplementing the National Plan for Vaccination against COVID-19 ([Решение № 91 от 3 февруари 2021 г. за допълнение на Националния план за ваксиниране срещу COVID-19 в Република България](#)), 3 February 2021.

not yet scheduled. The second revision<sup>4</sup> and the third revision,<sup>5</sup> also adopted in February 2021, did not introduce any changes to the priority groups, but allowed persons not belonging to these groups to get vaccinated, provided that there were enough vaccines (a practice that became known as the “green corridors”).

In **Bulgaria**, the national vaccine deployment plan included five priority groups (called phases), each defined on the basis of different criteria. According to the plan, the definition of the groups was based on “the risk of infection and the need to maintain the infrastructure that is critical for the functioning of the society”.<sup>6</sup> Phase 1 (medical personnel, pharmacists, dentists), part of Phase 2 (teachers and other pedagogical specialists), and Phase 3 (workers involved in the maintenance of essential activities) were defined on the basis of the increased exposure of these persons to the risk of infection and/or the essential nature of their work. The other part of Phase 2 (staff and users of social services) and Phase 4 (older persons and persons with underlying health problems) were defined on the basis of the greater likelihood of “more severe course of the disease and higher risk of complications and death”. Phase 5 (vulnerable groups at high epidemiological risk of infection related to their conditions and way of life) was introduced as a more general category encompassing different vulnerable groups of the population. These groups, however, had not been specifically defined yet.

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<sup>4</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), Decision No 144 of 19 February 2021 for supplementing the National Plan for Vaccination against COVID-19 ([Решение № 144 от 19 февруари 2021 г. за допълнение на Националния план за ваксиниране срещу COVID-19 в Република България](#)), 19 February 2021. The amendment allowed persons not belonging to the priority groups to get vaccinated during weekends.

<sup>5</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), Decision No 145 of 22 February 2021 for amending the National Plan for Vaccination against COVID-19 ([Решение № 145 от 22 февруари 2021 г. за изменение на Националния план за ваксиниране срещу COVID-19 в Република България](#)), 22 February 2021. The amendment allowed persons not belonging to the priority groups to get vaccinated during weekends and in the afternoon hours of working days.

<sup>6</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), National Plan for Vaccination against COVID-19 ([Национален план за ваксиниране срещу COVID-19 в Република България](#)), 7 December 2020, last amended 22 February 2021.

## 2 Vaccination rollout – communication, targeted outreach, registration, and administration of vaccinations

### 2.1 What are the (pre-) registration channels for vaccination put in place?

- a) Registration channels for vaccination in place e.g., websites, apps, hotlines/call centres, letters, via family doctors, etc.

In **Bulgaria**, the national vaccine deployment plan did not specify the registration channels for vaccination.<sup>7</sup> The rules on registration were laid down in an order issued by the Minister of Health. According to this order, persons wishing to receive a vaccine could register in person with their general practitioner or at one of the temporary vaccination centres set up at different medical establishments and at the Regional Health Inspectorates (RHI) (*Регионални здравни инспекции, РЗИ*), or online through the internet-based [vaccination registration platform](#).<sup>8</sup> The online registration platform is part of the National Healthcare Information System (*Национална здравно-информационна система*) and is available only in Bulgarian.

- b) Alternatives to digital access to vaccine registration in place e.g., appropriate support for those who need it (such as the elderly; those without access to the internet); physical locations for registration, etc.

In **Bulgaria**, persons wishing to receive a vaccine could choose whether to register online or in person. Those who were not able or did not wish to register online could register in person either with their general practitioner or at one of the temporary vaccination centres set up at different medical establishments and the Regional Health Inspectorates (RHI) (*Регионални здравни инспекции, РЗИ*).<sup>9</sup>

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<sup>7</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), National Plan for Vaccination against COVID-19 ([Национален план за ваксиниране срещу COVID-19 в Република България](#)), 7 December 2020, last amended 22 February 2021.

<sup>8</sup> Bulgaria, Ministry of Health (*Министерство на здравеопазването*) (2021), Order No РД-01-726 on the organisation of the immunisation campaign against COVID-19 ([Заповед № РД-01-726 за организацията на имунизационната кампания срещу COVID-19](#)), 23 December 2020, last amended 16 April 2021, Articles 7a and 7b. The full list of temporary vaccination centres is annexed to the order.

<sup>9</sup> Bulgaria, Ministry of Health (*Министерство на здравеопазването*) (2021), Order No РД-01-726 on the organisation of the immunisation campaign against COVID-19 ([Заповед № РД-01-726 за организацията на имунизационната кампания срещу COVID-19](#)), 23 December 2020, last amended 16 April 2021, Articles 7a. The full list of temporary vaccination centres is annexed to the order.

Many general practitioners and most of the temporary vaccination centres also registered persons by phone. Other alternatives, specifically aimed at persons in need, were not available.

## 2.2 How are the vaccinations administered?

- a) Places where the vaccinations are administered e.g., vaccination centres, via mobile units, via family doctors, etc.

In **Bulgaria**, according to the national vaccine deployment plan, vaccines had to be administered by doctors in hospitals and outpatient care facilities (including general practitioners), Regional Health Inspectorates (RHI) (*Регионални здравни инспекции, РЗИ*), doctors in specialised units of the Ministry of the Interior (MoI) (*Министерство на вътрешните работи, МВР*) and the Ministry of Defence (MD) (*Министерство на отбраната, МО*), and specialised vaccination teams, including mobile teams.<sup>10</sup> More detailed rules on the places for administering the vaccinations were laid down in an order issued by the Minister of Health. According to this order, there were two main channels for receiving a vaccine: through the general practitioners, who are obliged to vaccinate the persons from their patient lists wishing to receive a vaccine; and at the temporary vaccination centres set up at medical establishments and Regional Health Inspectorates (RHI) (*Регионални здравни инспекции, РЗИ*), which were available to everyone upon registration.<sup>11</sup>

- b) Provision of information for those being vaccinated about the actual vaccination process, the vaccine and any potential side effects

In **Bulgaria**, the national vaccine deployment plan envisaged that the general practitioners and the persons administering the vaccine should inform the persons being vaccinated about “the indications of the medical product, its method of application, its contraindications, as well as possible side effects and adverse events”.<sup>12</sup> Detailed information about the vaccination process, including a selection of frequently asked questions and an online form for reporting side

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<sup>10</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), National Plan for Vaccination against COVID-19 ([Национален план за ваксиниране срещу COVID-19 в Република България](#)), 7 December 2020, last amended 22 February 2021.

<sup>11</sup> Bulgaria, Ministry of Health (*Министерство на здравеопазването*) (2021), Order No РД-01-726 on the organisation of the immunisation campaign against COVID-19 ([Заповед № РД-01-726 за организацията на имунизационната кампания срещу COVID-19](#)), 23 December 2020, last amended 16 April 2021, Articles 3a and 3b.

<sup>12</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), National Plan for Vaccination against COVID-19 ([Национален план за ваксиниране срещу COVID-19 в Република България](#)), 7 December 2020, last amended 22 February 2021.

effects, was uploaded on the [vaccination section](#) of the official COVID-19 Uniform Information Portal (available only in Bulgarian).

- c) Circumstances where fees are applicable for receiving the vaccine e.g., for third country nationals

In **Bulgaria**, the vaccination was free of charge in line with the national vaccine deployment plan, which envisaged that the vaccines against COVID-19 and their application should be “free for the population, irrespective of the persons’ health insurance status”.<sup>13</sup>

## 3 Challenges and promising practices

### 3.1 Challenges

In **Bulgaria**, the biggest challenge was related to the opening of the so-called “green corridors”, which allowed all adult citizens, who did not fall within the priority groups, to receive a vaccine. To incorporate the new approach into the national vaccine deployment plan, the government revised the plan adding an explicit provision allowing persons not belonging to the priority groups to receive a vaccine, provided that there were enough vaccines. In the beginning, the green corridors operated only on Saturday and Sunday,<sup>14</sup> but afterwards they were also made available in the afternoon hours of working days.<sup>15</sup> More than 130 temporary vaccination centres were opened across the country for servicing the “green corridors”, including in the main city of each administrative district and in some

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<sup>13</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), National Plan for Vaccination against COVID-19 ([Национален план за ваксиниране срещу COVID-19 в Република България](#)), 7 December 2020, last amended 22 February 2021.

<sup>14</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), Decision No 144 of 19 February 2021 for supplementing the National Plan for Vaccination against COVID-19 ([Решение № 144 от 19 февруари 2021 г. за допълнение на Националния план за ваксиниране срещу COVID-19 в Република България](#)), 19 February 2021. The amendment allowed persons not belonging to the priority groups to get vaccinated during weekends.

<sup>15</sup> Bulgaria, Council of Ministers (*Министерски съвет*) (2021), Decision No 145 of 22 February 2021 for amending the National Plan for Vaccination against COVID-19 ([Решение № 145 от 22 февруари 2021 г. за изменение на Националния план за ваксиниране срещу COVID-19 в Република България](#)), 22 February 2021. The amendment allowed persons not belonging to the priority groups to get vaccinated during weekends and in the afternoon hours of working days.



smaller towns.<sup>16</sup> People living in other locations, including in rural areas, could also benefit from the “green corridors” by visiting the closest city or town with an operating temporary vaccination centre. The government promoted the “green corridors” as a promising practice aimed at speeding up the vaccination process in the country.<sup>17</sup> At the same time, the measure was criticised for being in apparent contradiction with the initial plan and for prioritising random vaccination over the vaccination of priority groups. In an open letter to the parliament, a group of four civil society organisations, led by the Bulgarian Helsinki Committee (BHC) (*Български хелзинкски комитет, БХК*) described the national vaccination policy as unfair and discriminatory, and called for its urgent revision for facilitating the access to vaccines for the most vulnerable groups of the population.<sup>18</sup> In the letter, the organisations pointed out that the most vulnerable groups of the population, namely the older persons and the persons with serious chronic diseases, were discriminated against, because they were left only in the fourth phase of the plan and no specific procedures were provided to ensure their access to vaccination points and appropriate vaccines.

In **Bulgaria**, general practitioners complained that random vaccination through the green corridors was prioritised over the vaccination through the general practitioners leaving the latter with insufficient number of vaccines for their registered patients. In the beginning of March 2021, the National Association of General Practitioners in Bulgaria (NAGPB) (*Национално сдружение на общопрактикуващите лекари в България, НСОПЛБ*) sent an official letter to the Minister of Health pointing out that due to the random vaccination through the green corridors the general practitioners had received less than 25% of the requested quantities of vaccines, which prevented them to vaccinate many of their patients, including those belonging to the priority groups defined in the national vaccine deployment plan.<sup>19</sup>

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<sup>16</sup> The full list of temporary vaccination centres operating as of 30 April 2021 is available on the [website](#) of the Ministry of Health.

<sup>17</sup> Bulgaria, Ministry of Health (*Министерство на здравеопазването*) (2021), ‘Minister Angelov: I am satisfied with the pace of the vaccination campaign against COVID-19 in the country’ ([‘Министър Ангелов: Удовлетворен съм от темпа, с който върви ваксинационната кампания срещу COVID-19 в страната’](#)), press release, 23 February 2021.

<sup>18</sup> Bulgarian Helsinki Committee (*Български хелзинкски комитет*) (2021), ‘Address to the MPs in the 45th National Assembly for fairness of the vaccination process in Bulgaria’ ([‘Обръщение до народните представители в 45-ото Народно събрание за справедливост на ваксинационния процес в България’](#)), press release, 7 April 2021.

<sup>19</sup> National Association of General Practitioners in Bulgaria (*Национално сдружение на общопрактикуващите лекари в България*) (2021), Letter No 4/01.03.2021 to the Minister of Health ([‘Писмо № 4/01.03.2021 г. до министъра на здравеопазването’](#)), 1 March 2021.

The problems with the distribution of vaccines among general practitioners were confirmed by a study published by the National Association of General Practitioners in Bulgaria (NAGPB) (*Национално сдружение на общопрактикуващите лекари в България*, НСОПЛБ). The survey was conducted in the period 12-15 March 2021 among 607 general practitioners from all districts of the country (approximately 15% of all general practitioners). The results showed that almost 69% of the general practitioners had to visit the local health inspectorate more than once before receiving vaccines, about 50% had visited the local health inspectorate between one and three times without receiving any vaccines, for 70% the time for receiving the vaccines had taken more than two hours (including travel and waiting), and about 78% had not received daily notifications (by phone or e-mail) about the available vaccines and how to receive them. To improve the situation with the distribution of vaccines, the study recommended, among other things, publishing and daily updating of information on the available quantities of vaccines on the websites of the Ministry of Health (MH) (*Министерство на здравеопазването*, МЗ) and the Regional Health Inspectorates (RHI) (*Регионални здравни инспекции*, РЗИ) and undertaking measures for speeding up the delivery of vaccines, such as permitting one doctor to receive the vaccines for some of their colleagues with whom they work in close proximity or delivering the vaccines to the doctor's offices through other public authorities (the police) or through a courier service.<sup>20</sup>

After the incident, the general practitioners continued to blame the government for the poor and ineffective organisation of the vaccination process, the lack of regularly updated information on the available types and quantities of vaccines, and the prioritisation of random vaccination through the green corridors.<sup>21</sup> The government responded to the criticism by announcing plans for the launch of a new electronic system allowing general practitioners to submit their requests for vaccines electronically. The system is expected to become operational in May 2021.<sup>22</sup>

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<sup>20</sup> National Association of General Practitioners in Bulgaria (*Национално сдружение на общопрактикуващите лекари в България*) (2021), Results of a survey of general practitioners related to vaccination against COVID-19 ([Резултати от Анкета на сред общопрактикуващите лекари, свързана с ваксинацията срещу КОВИД-19](#)), 18 March 2021.

<sup>21</sup> Bulgarian National Television (*Българска национална телевизия*) (2021), 'Dr Georgi Mindov: We now have to fight for vaccines' (['Д-р Георги Миндов: Вече трябва да се бием за ваксини'](#)), 27 April 2021.

<sup>22</sup> Zehirova, Z. (2021), 'An e-system could solve the problem of queues of doctors for COVID vaccines after the holidays' (['Е-система можела след празниците да реши проблема с опашки от лекари за COVID ваксини'](#)), *Dnevnik.bg*, 29 April 2021.

## 3.2 Promising practices

In **Bulgaria**, mobile teams were set up to vaccinate persons living in remote and hard-to-reach locations. Before the start of the vaccination campaign, the government announced that a total of 47 mobile teams were planned for the whole territory of the country.<sup>23</sup> There is no publicly available information how many mobile teams were actually deployed after the start of the campaign, but based on media reports such teams were operating in across the entire country.<sup>24</sup> Their operation was coordinated by the Ministry of Health (*Министерство на здравеопазването*, МЗ), which was responsible, in cooperation with the National Association of Municipalities in the Republic of Bulgaria (NAMRB) (*Национално сдружение на общините в Република България*, НСОПБ), for identifying the locations that were hard to reach for the general practitioners and ensure access to vaccines for the people living there.<sup>25</sup>

In **Bulgaria**, in the city of Ruse, the Bulgarian Red Cross (BRC) (*Български червен кръст*, БЧК) in cooperation with the local Regional Health Inspectorate (RHI) (*Регионална здравна инспекция*, РЗИ) set up the first temporary vaccination centre for homeless persons in the country. Before receiving the vaccine, each person was examined by a doctor, informed about the vaccination process and advised to contact the team of the Bulgarian Red Cross (BRC) (*Български червен кръст*, БЧК) in case of side effects.<sup>26</sup>

In **Bulgaria**, the government did not undertake special measures to facilitate the provision of information on the vaccination process to persons with intellectual impairments. To fill this gap, the Bulgarian Association for Persons with Intellectual Disabilities (BAPID) (*Българска асоциация за лица с интелектуални затруднения*, БАЛИЗ) translated in Bulgarian the easy-to-read information about

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<sup>23</sup> Bulgaria, Ministry of Health (*Министерство на здравеопазването*) (2021), '47 mobile vaccination teams will operate across the country' (['47 мобилни екипа за ваксинация ще работят в цялата страна'](#)), press release, 14 December 2020.

<sup>24</sup> For example, see: Balabanova, D. (2021), 'As of today, two mobile immunisation teams have been formed for the Lovech region' (['От днес за Ловешка област са сформирани два мобилни екипа за имунизирание'](#)), *Bulgarian New Agency*, 1 March 2021; Ivanova, E. (2021), 'Mobile teams carry out vaccinations in the villages in Kyustendil municipality' (['Мобилни екипи извършват ваксинация в селата в Кюстендилска община'](#)), *Bulgarian New Agency*, 9 March 2021; Bekriev, B. (2021), 'Mobile vaccination teams are entering the fight against the the coronavirus' (['Мобилни екипи за ваксинация влизат в битката с коронавируса'](#)), *Nova TV*, 11 March 2021.

<sup>25</sup> Bulgaria, Ministry of Health (*Министерство на здравеопазването*) (2021), 'Mobile vaccination teams against COVID-19 will immunise those wishing to receive the vaccine in remote and hard-to-reach places' (['Мобилни екипи за ваксиниране срещу COVID-19 ще имунизират желаещите да получат ваксина в отдалечените и труднодостъпни места'](#)), press release, 22 February 2021.

<sup>26</sup> Angelova, I. (2021), 'Generosity during the pandemic: Homeless people are vaccinated in Ruse' (['Благородност в пандемията: В Русе ваксинират бездомни хора'](#)), *Bulgaria On Air*, 9 April 2021.

the vaccine developed by the European Association of Societies of Persons with Intellectual Disability and their Families (Inclusion Europe) and the European Association of Service Providers for Persons with Disabilities (EASPD).<sup>27</sup>

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<sup>27</sup> Bulgarian Association for Persons with Intellectual Disabilities (*Българска асоциация за лица с интелектуални затруднения*) (2021), 'Consent and support in the vaccination process' (['Съгласие и подкрепа в процеса на ваксиниране'](#)), press release, 9 April 2021.