



Raphaelswerk e.V.

BULGARIA: Information for refugees who are returned to Bulgaria

Drawn up in November 2019

Under the Dublin Regulation, refugees may be transferred to the EU country responsible (in most cases, the country of first entry), so that the asylum procedure is carried out there. Refugees who have already been recognised in another EU country will be returned to that country on the basis of the safe third country clause because their asylum application is not admissible in Germany.

For many refugees, their imminent return to another EU country creates great uncertainty.

Our guide is intended for advisers, voluntary support groups and people who are affected. It is supposed to show existing services and contacts. Refugees will be given information about their situation after being returned as well as addresses of organisations they may contact locally for support. However, no assessment of these organisations and services is made.

Many services offering help in Bulgaria are short-term projects and not subsidised on a regular basis. At the time when the information provided herein was compiled (November 2019), there was only a small number of permanent support structures. We therefore do not claim that the list is exhaustive.

This report must not be used as general proof of existing services offering help. As regards the current situation for asylum seekers in Bulgaria, we especially refer to the report of the Swiss Refugee Council: "*Bulgarien: Aktuelle Situation für Asylsuchende und Personen mit Schutzstatus*" (Bulgaria: Current situation for asylum seekers and beneficiaries of protection), *Auskunft Bereich Recht Schweizerische Flüchtlingshilfe* (legal department of the Swiss Refugee Council), 30/08/2019, <https://www.fluechtlingshilfe.ch/assets/asylrecht/stellungnahmen/190829-bulgarien-auskunft.pdf>

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Procedure after re-entry into Bulgaria

The State Agency for Refugees (SAR) informs the border police of the arrival of returnees. The Agency specifies whether the returnees are to be taken to a reception centre for refugees or to a detention centre. That depends on the stage of the returnee's asylum procedure.

What needs to be done first?

That depends on whether the person concerned left Bulgaria while the asylum procedure was in progress or whether he/she had not yet initiated an asylum procedure in Bulgaria before his/her departure. Depending on the situation, different steps must be taken.

The person concerned has not lodged an application for asylum in Bulgaria yet:

The person concerned applies for asylum in accordance with the procedure described below.

The person concerned has already lodged an application for asylum in Bulgaria and left Bulgaria during the asylum procedure:

A decision in favour of granting the asylum application has been taken:

Protection status has been granted. The person concerned has residence status in Bulgaria.

No decision has yet been taken on the asylum application:

The asylum procedure was suspended because of the refugee's absence and is now resumed.

By law, a procedure that was not completed must be resumed; in the event of problems, the person concerned should contact a legal adviser.

The State Agency for Refugees may discontinue a procedure if asylum seekers do not keep their appointments. If a corresponding notice was delivered to the address in Bulgaria, such discontinuation is final and absolute and the procedure cannot be resumed. In that case, asylum seekers may lodge a new application for asylum, which is regarded as an initial application.

If the procedure was discontinued with final and binding effect, the person concerned is not entitled to accommodation and health care. In that case, the returnee may be detained pending deportation.

The asylum application was rejected:

If the asylum application was rejected with final and binding effect, the returnee may be detained pending deportation, mostly in the detention centres in Busmantsi near Sofia or in Lyubimets near the Turkish border.

An asylum application is deemed rejected with final and binding effect if and when the notice of rejection was delivered and no appeal was lodged within the prescribed time limit. The person concerned is not entitled to accommodation and health care.

If the asylum application was rejected during the applicant's absence and the decision could not be served on the asylum seeker, the returnee is taken to a reception centre for refugees.

Residence status in Bulgaria

International protection:

- **Refugee status** (*статум на бежанец*): unlimited residence status. The person concerned is granted a residence permit ("card of a refugee") that is valid for 5 years and may be extended. He/she is entitled to family reunification. With a few exceptions, recognised refugees have the same rights as Bulgarian citizens.
- **Subsidiary protection** (humanitarian status – *хуманитарен статум*): unlimited residence status. The person concerned is granted a residence permit ("card of an alien with humanitarian status") that is valid for 3 years and may be extended. He/she is entitled to family reunification. Persons entitled to subsidiary protection have the same rights as third-country nationals with a permanent residence permit.

Procedures under the law of residence/asylum procedures

The wish to apply for asylum may be expressed vis-à-vis the State Agency for Refugees or other state authorities, either in the country or on the border. Subsequently, asylum seekers are registered by the State Agency for Refugees and file their application for asylum in person.

After entering the country illegally, most asylum seekers are detained at first until they are taken to a reception centre for asylum seekers. There they are registered by the State Agency for Refugees and their asylum application is recorded formally.

After registration, they are given a provisional identification document, the "registration card".

Subsequently, asylum seekers are invited to an interview. During the interview, the flight as well as the reasons for the asylum application are described. If further clarification is required, a second interview may take place. An interpreter is present during the interview. Before the interview, asylum seekers are asked whether they wish to deal with a person of the same sex during the interview and for interpreting.

According to various reports¹, there are problems with interpreting during asylum procedures because for many languages there are no interpreters and the quality is often poor. This concerns registration, the interview in the asylum procedure and the appeal procedure. Moreover, the authorities do not always inform asylum seekers of the asylum procedure and their rights in a language they understand. Often, this is only done by NGOs.

A decision on lodged asylum applications is to be taken within six months. This period may be extended by another 9 months. The total duration of the asylum procedure is not supposed to exceed 21 months.

An accelerated procedure may be carried out in the case of manifestly unfounded applications. In such cases, a decision must be taken within 10 days of lodging the application.

¹ Country Report: Bulgaria; aida Asylum Information Database, 2018 update; <http://www.asylumineurope.org/reports/country/bulgaria> and "Report of the fact-finding mission by Ambassador Tomáš Boček, Special Representative of the Secretary General on migration and refugees, to Bulgaria, 13-17 November 2017", Council of Europe, Information Documents SG/Inf(2018),18, 19/4/2018, <https://rm.coe.int/report-of-the-fact-finding-mission-by-ambassador-tomas-bocek-special-r/16807be041>

Decision:

The decision on the asylum application is given in writing and communicated in a personal talk, during which the result is explained.

If the asylum application was granted, the applicant is given a residence permit, depending on the status granted (refugee status or subsidiary protection).

If the asylum application is rejected, the applicant loses the right of residence in Bulgaria and may be deported to the country of origin.

Appeal:

If a decision against the application is taken, an appeal may be lodged with the competent Regional Administrative Court. The time limit is 14 days for the normal procedure and 7 days for the accelerated procedure. An appeal has a suspensive effect, so that no asylum seeker may be deported until a decision is taken.

Legal assistance:

The law provides for a right to free legal assistance in asylum procedures; however, there are no publicly funded services. Only for vulnerable persons, support by the National Legal Aid Bureau was introduced in 2018 as part of a pilot project. Other asylum seekers should contact an NGO such as the Bulgarian Helsinki Committee in order to obtain legal assistance.

In appeal procedures, a lawyer is provided. However, the lawyer only takes action during the procedure and does not provide any support in connection with lodging the appeal.

Subsequent application:

After the initial asylum application was rejected with final and binding effect, a subsequent application may be lodged. Only if there are new reasons indicating that the refugee is in need of protection or if there is new evidence will a new asylum procedure be carried out.

Asylum seekers who have lodged a subsequent application for asylum are not entitled to accommodation and provision of food and they are not issued with a registration card. Exceptions apply to vulnerable persons.

Detention

Detention prior to deportation

Asylum seekers may be held in detention for illegal entry for an initial period of up to 30 days. Further reasons for detention are missing identification documents or a risk of absconding. After expiry of the 30-day period, a decision on continuing reasons for detention must be taken or the person concerned must be transferred to an open refugee centre. The maximum term of detention for refugees who are detained pending deportation is 18 months. The detention centres (Busmantsi and Lyubimets) are run by the police.

If the detained persons are not transferred to an open refugee centre in time, access to the asylum procedure is often only possible later.

Detention conditions are poor as regards hygiene, food, security and access to health care, interpreters and legal advice.

Closed refugee centres

The person concerned may be placed in closed refugee centres (detention) for the entire duration of the asylum procedure. If, for example, the person's identity must be established or if there is a risk of absconding, the person concerned may be placed there. The centres are operated by the State Agency for Refugees. An action may be brought before the courts against placement in a closed refugee centre.

Competent authorities

Stage of the procedure	Competent authority	English name of the authority
Application	Държавна агенция за бежанците (ДАБ) и друг държавен орган	State Agency for Refugees (SAR) & any state authority
National security clearance	Държавна агенция "Национална сигурност"	State Agency for National Security (SANS)
Dublin procedure	Държавна агенция за бежанците (ДАБ)	State Agency for Refugees (SAR)
Admissibility procedure	Държавна агенция за бежанците (ДАБ)	State Agency for Refugees (SAR)
Accelerated procedure	Държавна агенция за бежанците (ДАБ)	State Agency for Refugees (SAR)
Refugee status determination	Държавна агенция за бежанците (ДАБ)	State Agency for Refugees (SAR)
First appeal	административен съд по местоживееене	Regional Administrative Court
Onward appeal	Върховен административен съд	Supreme Administrative Court

Source: Country Report: Bulgaria; aida Asylum Information Database; 2018 update

Contact with the State Agency for Refugees:

State Agency for Refugees with the Council of Ministers
Държавна агенция за бежанците при Министерския Съвет
1233 Sofia
Serdika District
114-B, Maria Luiza Blvd.
Tel. +359 (0)2 80 80 923/24/25
E-mail: sar@saref.government.bg
<https://aref.government.bg/en>

What duties do asylum seekers have in Bulgaria?

Asylum seekers are obliged

- to remain in Bulgaria until a decision on the asylum application is taken;
- not to leave the area specified on their registration card ("movement zone") unless this has been approved by the management of their accommodation facility;
- to live at the address approved by the State Agency for Refugees; it is only possible to leave refugee accommodation overnight with the permission of the management of the facility;
- to inform the State Agency for Refugees of any changes in their contact details;
- to attend the interviews at the State Agency for Refugees.

What rights do asylum seekers have in Bulgaria?

As soon as an application for asylum is lodged, asylum seekers are entitled

- to remain in Bulgaria until a decision on the application is taken;
- to remain in Bulgaria until the court gives a decision if an action is brought against a rejected application;
- to accommodation, provision of food and health care;
- to an interpreter during the interviews;
- to free legal assistance.

By law, asylum seekers are entitled to accommodation, food, financial support, health care and psychological support. However, according to the AIDA Report², only accommodation, food and basic health care are provided in practice.

If asylum seekers are discriminated against or if their rights are infringed, they should contact an advisory centre of an NGO (see addresses in the annex).

Return to the country of origin

Refugees who want to return to their country of origin may receive financial support on certain conditions. Information may be obtained from IOM Bulgaria.

² Country Report: Bulgaria; aida Asylum Information Database, 2018 update;
<http://www.asylumineurope.org/reports/country/bulgaria>, S. 45-46

Further information:

<http://refugeelife.bg/assisted-voluntary-return-and-reintegration>

Residence document for asylum seekers (registration card)

After their registration with the State Agency for Refugees, asylum seekers are given a provisional document, the registration card. This card counts as proof of their right of residence in Bulgaria during the asylum procedure. It shows the address at which the asylum seekers are accommodated and in the vicinity of which they may stay. Normally, the card is valid for 3 months and must be extended on a regular basis.

The registration card is required so that asylum seekers may avail themselves of their rights (right of residence, accommodation, financial support, health care).

Entry in the population register

Recognised refugees and persons entitled to subsidiary protection must be entered in the electronic population register (ЕЦПАОН). To do so, the registration card, the decision on the refugee status or humanitarian status and proof of residence must be presented.

After registration, the identification number EGN (единен граждански номер, ЕГН) is assigned.

Entry in the population register is required so that the residence permit may be issued.

It is a problem that a place of residence must be proved in order to be entered in the population register. The refugee centre in which the person concerned stayed during the asylum procedure may not be given as a place of residence. However, a valid residence permit is required to rent an apartment or the like.

Moreover, a valid residence permit is required to get access to social services, health care, etc.

Accommodation after re-entry

The accommodation of **returnees** depends on their status:

Returnees whose application for asylum was rejected with final and binding effect are not entitled to accommodation. They run the risk of becoming homeless.

If the asylum procedure has not been completed yet, returnees may be accommodated in a refugee hostel. However, anyone who has left the hostel or Bulgaria may have lost his/her entitlement to accommodation. For that reason, it is possible that returnees under the Dublin Regulation are not admitted to refugee hostels and they run the risk of becoming homeless. Exceptions only apply to families with children and vulnerable persons, who are given food and accommodation. Other returnees must find a place to stay at their own expense or apply for a place in a shelter for the homeless.

Since the refugee hostels are currently not full, returnees may be placed there. However, there is no guarantee that approval is granted for accommodation in a refugee hostel.

If the asylum procedure was suspended or discontinued during the applicant's absence, there may be delays; it is possible that returnees are only placed in a refugee hostel if their asylum procedure was resumed.

Beneficiaries of protection in Bulgaria who were deported from another country to Bulgaria must find a place to stay on their own. It is not possible for them to be placed in a refugee centre again because they left it when leaving Bulgaria. Consequently, they run a serious risk of becoming homeless.

Moreover, without a registered address, they have no access to state support services such as receipt of social welfare benefits or registration as a job seeker with the Bulgarian employment office.

Asylum seekers who lodge an asylum application in Bulgaria for the first time are entitled to accommodation. In most cases, they are placed in refugee hostels. Families have the right to be accommodated together.

Asylum seekers going through the regular procedure who have means of their own may also find a place to live outside the facilities at their own expense. As a result, they lose their entitlement to food and financial support. They generally have no right any more to be admitted to a refugee hostel at a later point in time.

In the case of subsequent applications, there is no right to accommodation. Exceptions apply to vulnerable persons.

Asylum seekers who are placed in refugee hostels are given meals there.

Asylum seekers who live outside the refugee hostels or are not entitled to accommodation have no access to food and psychological support.

The conditions in the refugee hostels, above all the hygienic conditions, are often poor. Moreover, the safety of the occupants is not guaranteed in every facility. In addition, there is not enough qualified personnel, for example with regard to interpreting or psychological support. Access to information about the rights of asylum seekers is often insufficient.

The period of accommodation in facilities for refugees during the asylum procedure is unlimited. Asylum seekers may also stay there during the appeal procedure.

Persons granted international protection may stay in the refugee centre for another six months after the decision on their asylum application has been taken, provided there is a place available.

The Integration Act provides for financial support for rent for persons granted international protection for a period of six months; however, in practice it is not paid out because the legal provisions on state integration support are not implemented.

For beneficiaries of protection, access to housing is more difficult because valid identification papers are required to sign a lease. As described above, a place of residence is necessary to be issued with such a paper.

In order to rent social housing, it is usually necessary that the person concerned has previously resided in the relevant municipality for a period of 5 to 10 years. The exact requirements vary from town to town.

Voluntary support groups in Germany can support returnees by collecting money as an initial aid for them and transferring it to them as soon as they arrive in Bulgaria. They should not take cash with them.

Cash payments to asylum seekers

By law, asylum seekers who are placed in refugee accommodation are entitled to financial support in cash. However, cash payments to asylum seekers were suspended in 2015. Besides, the amount provided by law was too low to meet the basic needs.

Asylum seekers in refugee accommodation only receive packages of hygiene products. Cost of medication and medical examinations that are not covered by the health service as well as baby products are not covered.

The law does not provide for financial support for asylum seekers who live outside refugee hostels.

Social services

Persons granted international protection are entitled to all support services that the law provides for Bulgarian citizens.

The competent authority is the local social welfare office (Agency for Social Assistance, ASA).

In practice, most beneficiaries of protection who have returned from abroad do not have access to social services, especially when they have no accommodation. To receive social welfare benefits, a place of residence and a valid identity card are required. Often registration with the local employment office is another requirement.

In addition, for many benefits it is required that the person concerned has previously resided locally for a certain period of time.

Besides, the formalities of applying for social welfare benefits are complicated. Support and advice are only offered by NGOs.

Information on social services for beneficiaries of protection:

<https://www.refugee-integration.bg/en> – Social assistance.

Access to health care

Asylum seekers have health insurance free of charge during the asylum procedure. They are entitled to health care on the same terms as Bulgarian citizens. They choose a general practitioner who will transfer them to a specialist if necessary. Some treatments such as dental treatments are not covered by the insurance and must be paid by the asylum seeker.

The refugee hostels have their own medical practices where basic health care is provided. If necessary, asylum seekers must undergo specialist treatments outside the facilities; however, because they often lack the financial means for co-payments, this is not always possible.

Returnees under the Dublin Regulation who left Bulgaria in 2019 are normally covered again by health insurance if their asylum procedure is continued. As regards persons who left Bulgaria before 2019, the asylum authority must inform the social security authority in writing; as a result, there are often delays in these cases when it comes to readmitting the person concerned to the health insurance scheme.

If an asylum application was rejected with final and binding effect, there is no access to health care.

There are no special treatments for victims of torture or persons with mental disorders. Some NGOs offer psychological help.

In practice, access to health care is often insufficient; the Bulgarian health care system does not have sufficient funds and there are not enough doctors and nursing staff.

Beneficiaries of protection must pay the health insurance premium themselves as soon as their status is recognised. For unemployed persons who do not receive any unemployment benefit, the health insurance premium amounts to approx. 10 euro per month. Excess must be paid for visits to the doctor. As a result, many people without means have no health insurance. Access to health care is difficult because of the shortage of doctors. A lack of language skills represents another obstacle.

Access to educational institutions

Children seeking asylum and children of beneficiaries of protection are entitled to school education at regular schools and to vocational training. The State Agency for Refugees generally organises the way from the refugee hostels to the schools. If the refugee hostel is in a remote area, it may be difficult to get to school.

There are no preparatory classes before enrolling in a regular school.

Children who are placed in a closed refugee centre together with their parents often do not have the chance to attend school.

Adult asylum seekers and beneficiaries of protection may take up vocational training and go to state schools and universities. Since qualifications gained in the country of origin are often not recognised, access to university is difficult.

Language courses

Bulgarian courses are only offered by NGOs. In some refugee hostels, Caritas organises language courses given by volunteers. Bulgarian courses are also offered at the integration centres of Caritas and the Bulgarian Red Cross in Sofia.

Access to the labour market

Asylum seekers in possession of a registration card are allowed to work 3 months after their registration in Bulgaria. They must apply to the State Agency for Refugees for a work permit. With that permit, they have unrestricted access to the labour market. If they lose their job, they are entitled to unemployment benefit if they fulfil the requirements for receiving such benefit.

Asylum seekers may also take up vocational training.

Beneficiaries of protection have unrestricted access to the labour market and do not need a work permit. They may register with the Bulgarian employment office as a job seeker and take part in training and employment measures.

In practice, it is difficult for asylum seekers and beneficiaries of protection to find a job due to a lack of language skills and a high level of unemployment in Bulgaria. The recognition of qualifications is problematic as well; often qualifications must be gained again in Bulgaria.

Access to the labour market is very limited for beneficiaries of protection returning from abroad as long as they do not have a registered address. They cannot register with the Bulgarian employment office as a job seeker.

Integration support for beneficiaries of international protection

In practice, there is no integration support for beneficiaries of international protection.

An Integration Act from 2017 provides for local support services; local authorities may offer integration agreements on a voluntary basis. However, this Act has not been put into practice yet.

As a result, access to basic social rights, to work and health care is extremely limited. Beneficiaries of international protection run a high risk of living in poverty.

Vulnerable persons

Among the vulnerable persons are minors, unaccompanied minors, pregnant women, disabled persons, older persons, single parents with under-age children, persons with serious physical diseases or severe mental disorders, victims of human trafficking as well as persons who were subject to torture, rape or other forms of severe psychological, physical or sexual violence.

There is no systematic identification of vulnerable asylum seekers by the State Agency for Refugees. The early identification of vulnerable persons is often done by NGOs.

There are no procedural guarantees for vulnerable persons in asylum procedures. One exception is a pilot project for free legal assistance for vulnerable persons by the National Legal Aid Bureau.

The special needs of vulnerable persons are supposed to be considered when accommodation is provided; however, this is often done at the discretion of the official and without any systematic requirements. No special accommodation is provided in the refugee centres for women, families or traumatised persons.

Psychological support in the reception centres is only offered by NGOs.

Before vulnerable persons are returned, e.g. families with small children, individual guarantees regarding the reception conditions are requested in advance. In most cases, these are obtained through the diplomatic missions in Bulgaria.

Annex: Where can I get advice and support?

Information material on Bulgaria for refugees in various languages

<http://asylum.bg/>: On-line portal containing information for asylum seekers about the asylum procedure, rights and duties, family reunification; in 8 languages (Bulgarian, English, French, Arabic, Dari, Farsi, Pashto, Urdu).

www.refugee-integration.bg/en/: Information platform of the "Bulgarian Council on Refugees and Migrants" containing information on the integration of vulnerable persons in Bulgaria: accommodation, health care, education, work, social services, family reunification; in Bulgarian and English.

<http://refugeelife.bg/>: Information platform of the "Foundation for Access to Rights FAR" in English, Arabic, Persian and Urdu, containing information for refugees about the asylum procedure and life in Bulgaria as well as a list of services offering help:

<http://refugeelife.bg/index.php/all-services>

Contacts / local advisory services

Caritas Sofia

St. Anna Center for Migration and Integration

1 Struma Str.

Sofia 1303

Tel. +359 2 869 63 35

E-mail: st.anna@caritas-sofia.org

www.caritas-sofia.org

Services to support integration of third-country nationals:
social counselling, support in dealing with the authorities, psychological support, language courses, educational opportunities for children and families, job application training and help with job search

Council of Refugee Women

95 Ekzarh Yosif str.

1000 Sofia

Tel.: +359 87 81 36 231; +359 87 66 55 402

office@crw-bg.org

<http://crw-bq.org/en/>

Services to support integration of third-country nationals:
social counselling, psychological support, support in dealing with the authorities, language courses, educational opportunities for children and families, job application training and help with job search

Bulgarian Red Cross

76 James Boucher blvd.

Sofia 1407

Tel. +359 2 81 64 700

<http://en.redcross.bg>

Social counselling and advice on integration issues

Legal advice

Bulgarian Helsinki Committee

<https://www.bghelsinki.org/en/>

Sofia: 1 Uzundjovska Street

Tel. +359 2 988 0057, +359 2 981 3318

E-mail: refunit@bghelsinki.org

Svilengrad: ul. "General Strukov" 5

Tel. +359 37963118

E-mail: refunit2@bghelsinki.org

Daily from 9 am to 5 pm

Legal advice for asylum seekers and refugees.

Advice is offered in the offices in Sofia and Svilengrad as well as in the reception centres in Ovcha Kupel, Voenna Rampa, Harmanli and Pastrogor.

Foundation for Access to Rights

E-mail: office@farbg.eu

Tel. +359 2 879 32 80

<http://www.farbg.eu/en/who-we-are/>

Advice by appointment

Legal advice for asylum seekers and refugees

National Legal Aid Bureau

1 Razvigor St.

1421 Sofia

Tel. +359 2 8193200

E-mail: nbpp@nbpp.government.bg

<https://www.nbpp.government.bg/en/>

Free legal assistance for vulnerable asylum seekers in asylum procedures

Information on return to the country of origin

IOM Bulgaria

Tzar Assen str. 77

1463 Sofia

Tel: + 359 2 93-94-774

www.iom.bg

iomsofia@iom.int

Sources

- Country Report: Bulgaria; aida Asylum Information Database, 2018 update; <http://www.asylumineurope.org/reports/country/bulgaria>
- State Agency for Refugees, <https://aref.government.bg/en>
- Bulgarian Helsinki Committee (BHC), <http://asylum.bg/>
- Bulgarian Council on Refugees and Migrants <https://www.refugee-integration.bg/en/>
- Caritas Sofia, <http://caritas-sofia.org/en>
- UNHCR Bulgaria
- "*Bulgarien: Aktuelle Situation für Asylsuchende und Personen mit Schutzstatus*" (Bulgaria: Current Situation for asylum seekers and beneficiaries of protection), *Auskunft Bereich Recht Schweizerische Flüchtlingshilfe* (legal department of the Swiss Refugee Council), 30/08/2019, <https://www.fluechtlingshilfe.ch/assets/asylrecht/stellungnahmen/190829-bulgarien-auskunft.pdf>
- "Report of the fact-finding mission by Ambassador Tomáš Boček, Special Representative of the Secretary General on migration and refugees, to Bulgaria, 13-17 November 2017", Council of Europe, Information Documents SG/Inf(2018),18, 19/4/.2018, <https://rm.coe.int/report-of-the-fact-finding-mission-by-ambassador-tomas-bocek-special-r/16807be041>
- "*Bulgarien: Flüchtlinge zwischen Haft und Obdachlosigkeit. Die Lage der Geflüchteten im Transit, ihre Unterbringung und Integrationsperspektiven in Bulgarien*" (Bulgaria: Refugees between detention and homelessness. The situation of refugees in transit, their accommodation and integration prospects in Bulgaria), Marc Speer, Mathias Fiedler, May 2019, <https://www.rosalux.de/publikation/id/40498/bulgarien-fluechtlinge-zwischen-haft-und-obdachlosigkeit/>