

NO NAME KITCHEN

**SUBMISSION FOR THE
UNIVERSAL PERIODIC
REVIEW OF
BULGARIA IN
NOVEMBER
2025**



1. SUBMITTING ORGANISATION

No Name Kitchen (NNK) is an independent organization working to document and monitor border violence perpetrated by police and state officials. Founded in 2017, NNK collaborates closely with affected communities to report human rights violations, including pushbacks, collective expulsions, systemic neglect, and administrative and judicial misconduct. NNK has been present in Bulgaria since 2023. For inquiries, please contact: press@nonamekitchen.org.

2. INTRODUCTION

This submission for the Universal Periodic Review of Bulgaria in November 2025 summarizes No Name Kitchen's (NNK) findings and concerns regarding violence against people on the move in Bulgaria. It highlights key issues, including the systematic use of pushbacks and pullbacks (Sections 3 and 4), the widespread use of migration detention (Section 5), and inhumane conditions in detention and reception centers (Section 6). These violations are compounded by rampant physical and psychological abuse (Section 7), lack of due process and abuse of power (Section 8), coercion into voluntary returns (Section 9), deaths and disappearances (Section 10), and the harassment and intimidation of human rights defenders (Section 11). Finally, we present urgent recommendations for actions the Bulgarian state must take to uphold the rights and dignity of affected individuals (Section 12).

3. PUSHBACKS

Despite repression limiting civil society actors' ability to document cases, pushbacks - forcibly returning migrants to the country they crossed from without access to international protection - by Bulgarian authorities likely number in the tens of thousands. From January to October 2023, Bulgarian Border Police reported preventing 170,000 "illegal border crossings" at the Bulgarian-Turkish border.¹ The Bulgarian Helsinki Committee estimated at least 5,270 pushbacks in 2022 (double the number in 2021)² while acknowledging the actual figure is likely higher.³ Pushbacks continue to rise, along with increasing violence, which raises serious concerns over Bulgaria's compliance with the international prohibition on torture and other inhuman and

¹ Source: <https://11.be/sites/default/files/2024-02/20240214-Pushback-Report-2023-eng.pdf>

² Source: <https://www.infomigrants.net/en/post/51197/bulgaria-migrant-pushbacks-whats-behind-the-rise-in-violence-at-the-bulgarianturkish-border-14>

³ Source: <https://11.be/sites/default/files/2024-02/20240214-Pushback-Report-2023-eng.pdf>

degrading treatment (Article 5 UDHR, Article 7 ICCPR, Article 2 UNCAT, Article 3 ECHR, Article 37(a) CRC), the prohibition of collective expulsions (Article 4 of Protocol No. 4 to the ECHR), the right to due process in expulsion procedures (Article 13 ICCPR), and the principle of non-refoulement (Article 33 of the 1951 Refugee Convention, Article 3 UNCAT, Article 7 ICCPR).

These pushbacks are frequently violent. An Afghan man who experienced three pushbacks, with the most recent in September 2024, described that the group he was traveling with, including children, was insulted and threatened by police. The police told them that they would be shot if they didn't run fast enough.⁴ In March 2024, a respondent reported a pushback where he was forced to undress, the group's belongings were taken, they were beaten with rubber batons, and forced to cross the Maritsa River into Turkey in their underwear.⁵ In December 2024, a respondent reported lasting physical and psychological harm from a pushback, where his belongings were taken, he was kicked and beaten with sticks, given documents without translation, and forced to run back to Turkey, chased by dogs.⁶ Another respondent pushed back in September 2023 suffered a severe beating that left him unable to properly walk for over a week.⁷

These are just a few examples of many other similar testimonies that highlight systematic and widespread violations of international human rights law by Bulgarian border police.⁸ The number of expulsions is especially concerning, and in January 2025, a respondent in Harmanli, Bulgaria, informed NNK that he had experienced over 20 consecutive pushbacks from Bulgaria to Turkey.⁹ These unlawful and violent expulsions expose a deliberate policy undermining fundamental protections for asylum seekers.

4. PULLBACKS

In addition to pushbacks, 'pullbacks' - forcibly preventing individuals from leaving Bulgarian territory - are a growing concern. These practices also often involve excessive force, violating the prohibition of torture and other forms of inhuman and degrading treatment. For example, on 3rd March 2024, an Afghan man was pulled back

⁴ Source:

<https://bloodyborders.org/testimonials/they-have-been-pushed-back-from-bulgaria-to-turkey-three-times/>

⁵ Source:

<https://bloodyborders.org/testimonials/the-moment-when-we-crossed-they-were-waiting-for-us-in-cars/>

⁶ Source:

<https://bloodyborders.org/testimonials/beaten-and-pushed-back-in-the-cold-and-snow/>

⁷ Source:

<https://bloodyborders.org/testimonials/a-nightmare-in-strandzha-forest-the-horror-at-the-border-between-bulgaria-and-turkey/>

⁸ Available at www.bloodyborders.org

⁹ Testimony not publicly available.

by Bulgarian border police with 19 others. They were beaten and attacked by police dogs, leaving the group with several leg bites and physical injuries. The respondent still experiences pain walking and lost two incisor teeth:



On 25th January 2024, an Algerian man and his friend were stopped by police near the North Macedonian border.¹⁰ He was attacked by a police dog, and the officers repeatedly beat his head with their hands and his phone. They also beat his feet with a baton and forced him to sign documents without translation. His head and leg were injured, and his phone was broken (see pictures below).

More testimonies are available on our website.¹¹ The use of police dogs, excessive force, and forced signing of documents without translation reflects an institutionalized pattern of abuse that warrants urgent scrutiny and accountability. These pullbacks further violate the freedom of movement enshrined in Article 13 UDHR and Article 2 Protocol 4 ECHR, trapping them in Bulgaria and stripping them of their right to leave the country (Article 13.2 UDHR).



¹⁰ Source:

<https://bloodyborders.org/testimonials/he-felt-very-dizzy-and-was-almost-falling-on-the-floor/>

¹¹ Bloody Borders: www.bloodyborders.org

5. WIDESPREAD USE OF MIGRATION DETENTION

Detention plays a significant role in Bulgaria's asylum process, raising concerns about its widespread and often arbitrary use. Asylum seekers who enter "irregularly" are typically issued removal orders and placed in detention while awaiting deportation - many file their asylum claims from these facilities and remain there until formally accepted into the asylum procedure.¹² Those deported to Bulgaria may also face immediate detention under new removal orders. While the State Agency for Refugees claims detention should be used minimally,¹³ as legislated by the EU Reception Conditions Directive,¹⁴ a recent UNHCR report highlights that detention is often applied for the entire asylum process (rather than on a case-by-case basis) without individual assessments of necessity and proportionality.¹⁵

In addition to being widespread, detention in Bulgaria is also often arbitrary. Bulgarian law allows detention for the purpose of removal for up to six months (extendable to eighteen months),¹⁶ but authorities often extend detention with classified reports, preventing detainees from challenging these decisions.¹⁷ NNK frequently hears from detainees who were not informed of the reasons for their detention. One respondent, detained in February 2025, reported being held in solitary confinement for three months without knowing why. He was also told he would never see his children again and was threatened with being handed over to the Assad regime.¹⁸

This lack of transparency and failure to inform detainees violates many international human rights instruments, including Article 9 of the ICCPR, Article 9 of the UDHR, and Article 5 of the ECHR, which protect the right to liberty and prohibit arbitrary detention. These practices also hinder due process, violating Article 14 of the ICCPR and other due process rights. The absence of clear time limits for the detention of

¹² Source:

<https://eumigrationlawblog.eu/detention-of-asylum-seekers-interaction-between-the-return-and-reception-conditions-directives-in-bulgaria/>

¹³ Id.

¹⁴ Source:

<https://eumigrationlawblog.eu/detention-of-asylum-seekers-interaction-between-the-return-and-reception-conditions-directives-in-bulgaria/>

¹⁵ Source <https://data.unhcr.org/en/documents/details/111495>

¹⁶ Source:

<https://asylumineurope.org/reports/country/bulgaria/detention-asylum-seekers/legal-frame-work-detention/duration-detention>

¹⁷ Source:

<https://www.infomigrants.net/en/post/58185/migrants-deprived-of-their-fundamental-human-rights-in-bulgarian-detention-centers>

¹⁸ "The Bulgarian Trap: How European Countries Force Asylum Seekers into Abuse". NNK Report, March 2025. Page 16.

<https://bloodyborders.org/wp-content/uploads/2025/03/The-Bulgaria-Trap.pdf>

asylum seekers in Bulgarian law and the recast Reception Conditions Directive enables their prolonged and arbitrary detention.¹⁹

6. CONDITIONS IN DETENTION AND RECEPTION CENTERS

CENTERS

Testimonies collected by NNK describe the degrading conditions faced by asylum seekers in Bulgarian detention and reception centers.²⁰ Respondents have described being denied access to toilets,²¹ as well as overcrowding, poor hygiene, and infestations - so severe that some rely on spiders to control bed bugs - cause infections and wounds.²²



Busmantsi Detention Center, 2024 (NNK)

¹⁹ Source:

<https://eumigrationlawblog.eu/detention-of-asylum-seekers-interaction-between-the-return-and-reception-conditions-directives-in-bulgaria/>

²⁰ Check report at

<https://bloodyborders.org/wp-content/uploads/2025/03/The-Bulgaria-Trap.pdf>

²¹ “The Bulgarian Trap: How European Countries Force Asylum Seekers into Abuse”. NNK Report, March 2025. Page 14.

<https://bloodyborders.org/wp-content/uploads/2025/03/The-Bulgaria-Trap.pdf>

²² “The Bulgarian Trap: How European Countries Force Asylum Seekers into Abuse”. NNK Report, March 2025. Pages 12 to 14.

<https://bloodyborders.org/wp-content/uploads/2025/03/The-Bulgaria-Trap.pdf>

In March 2025, one detainee reported that the camp had lacked heating and hot water since early February, leaving residents in freezing temperatures for at least a month.²³ Meals are often reduced, and dinner is sometimes canceled, causing constant hunger among detainees.²⁴ One interviewee recounted how storing food was prohibited, and those caught hiding it faced physical punishment.²⁵ An asylum seeker deported from Germany faced food deprivation for days as punishment for leaving Bulgaria,²⁶ and a 19-year-old woman was deprived of food after receiving her second asylum rejection in Harmanli, relying on aid from NNK. Two respondents deported to Bulgaria reported being confined in an unfurnished room in Harmanli for 15 days without food, receiving only occasional provisions from other detainees.²⁷

Detainees also face inadequate healthcare and lack psychological support. At Busmantsi, interviewees report that medical care is limited to painkillers, with only one doctor available and no healthcare services when the doctor is absent.²⁸ The Bulgarian Helsinki Committee and the Committee for the Prevention of Torture have confirmed these issues, citing insufficient nutrition, medical care, and psychiatric support.²⁹ A detainee with cancer reported being systematically denied medical attention and essential medications; his requests for specialist consultations were dismissed, and any attempt to seek medical attention was met with threats.³⁰ With the progression of his disease, authorities accused him of feigning illness to avoid detention, pressuring him to return to Turkey. He compared his experience to Saydnaya prison in Syria.³¹ Another detainee with a chronic illness faced neglect and was denied essential healthcare and medication, causing the deterioration of his health. The only doctor, available once a week, refused to treat him, citing bureaucratic delays in registering new arrivals.³²

Even in so-called "open" reception centers like Harmanli, conditions are dire. Asylum seekers have provided videos and photos showing collapsing ceilings due to dampness and mold; exposed insulation wool (known to be harmful with prolonged exposure); overcrowded rooms with moldy mattresses; holes in windows, doors, floors, and walls; filthy living spaces; and broken, flooded toilets. Rat, cockroach, bedbug, and scabies infestations have also been widely reported. The appalling conditions reported in detention and reception centers violate human dignity and likely violate the

²³ Id., page 31

²⁴ Id., pages 13 and 14

²⁵ Id., page 14

²⁶ Id., page 31

²⁷ Id., page 19

²⁸ Id.

²⁹ Sources: <https://www.coe.int/en/web/cpt/-/the-cpt-publishes-report-on-bulgar-1> and <https://asylumineurope.org/reports/country/bulgaria/detention-asylum-seekers/detention-conditions/conditions-detention-facilities/>

³⁰ "The Bulgarian Trap: How European Countries Force Asylum Seekers into Abuse". NNK Report, March 2025. Page 14.

<https://bloodyborders.org/wp-content/uploads/2025/03/The-Bulgaria-Trap.pdf>

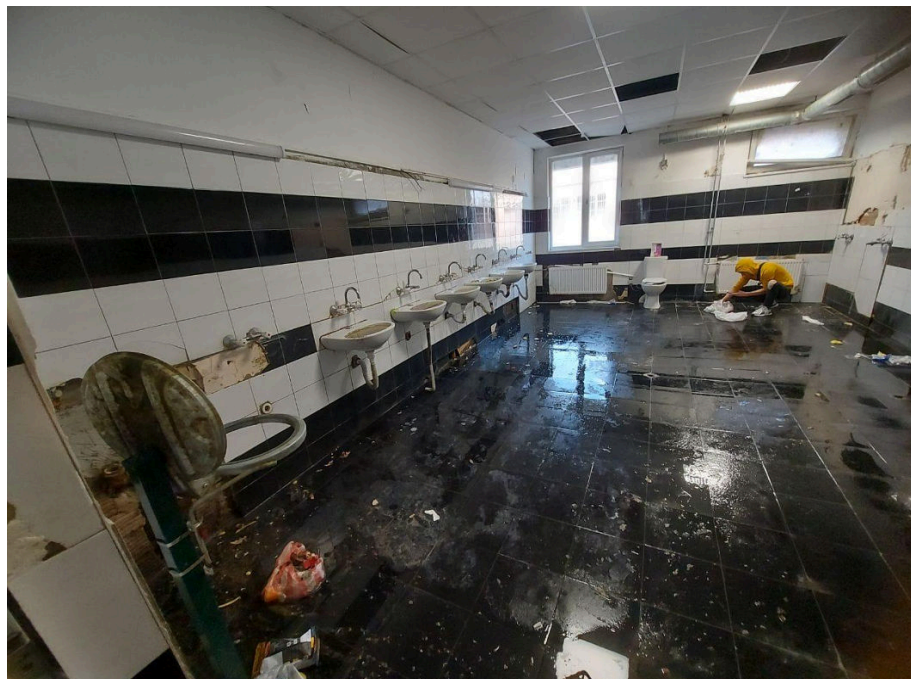
³¹ Id., pages 14 and 15

³² Id.

prohibition of inhuman and degrading treatment under Article 5 UDHR, Article 7 ICCPR, and Article 1 UNCAT (see also: *Neshkov and Others v. Bulgaria*, 2015).³³ Despite past court rulings halting deportations to Bulgaria due to the high risk of inhuman and degrading treatment,³⁴ conditions remain unchanged.



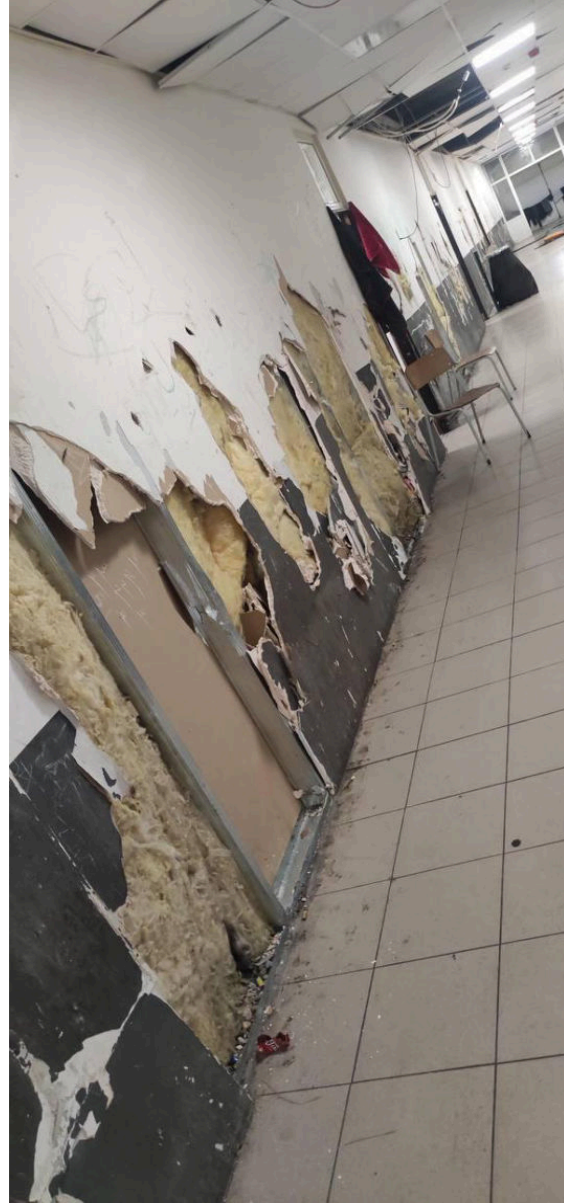
Harmanli Reception Center, 2024 (NNK)



Harmanli Reception Center, 2024 (NNK)

³³ Source: [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22001-150771%22\]}](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-150771%22]})

³⁴ Source: <https://ecre.org/wp-content/uploads/2016/12/The-Right-to-housing-for-beneficiaries-of-international-protection.pdf>



Harmanli Reception Center, 2024 (NNK)

7. PHYSICAL AND PSYCHOLOGICAL VIOLENCE

Testimonies collected by NNK highlight systemic abuse in Bulgarian detention centers. Detainees face regular police beatings,³⁵ and one respondent described experiencing such severe and repeated violence in detention that he was left with a broken nose.³⁶ Another detainee, held for two years, was placed in solitary confinement for three

³⁵ Source:

<https://www.infomigrants.net/en/post/58185/migrants-deprived-of-their-fundamental-human-rights-in-bulgarian-detention-centers>

³⁶ “The Bulgarian Trap: How European Countries Force Asylum Seekers into Abuse”. NNK Report, March 2025. Page 16.

<https://bloodyborders.org/wp-content/uploads/2025/03/The-Bulgaria-Trap.pdf>

months without explanation and was threatened with being handed over to the Assad regime. He described being beaten for not understanding Bulgarian instructions and told that he would never see his family again.³⁷ A Moroccan detainee described frequent, unprovoked police beatings.³⁸ Another respondent reported being beaten for possessing cookies in his room and later denied a visit from his lawyer to conceal his injuries.³⁹

Violence also extended to the Harmanli Reception Center, where police beat two innocent men (one of whom suffered a serious eye injury)⁴⁰ during a November 2024 incident, and routine nighttime beatings by masked officers occurred.⁴¹ One asylum-seeker explained that violence was common in unmonitored areas, such as bathrooms.⁴² These testimonies illustrate a pattern of systemic abuse that violates several international human rights standards, such as the minimum rules for the treatment of prisoners,⁴³ the basic principles on the use of force by law enforcement officials,⁴⁴ and the prohibition of inhuman and degrading treatment - in some cases, it may meet the threshold for torture, as defined by Art. 1 of the UNCAT.

8. LACK OF DUE PROCESS AND ABUSE OF POWER

We raise serious concerns about the mismanagement of asylum claims, particularly with procedures appearing to discriminate based on nationality. NNK shared evidence with *The Guardian* in December 2024 of Syrian asylum rejections following the fall of Bashar al-Assad, and we have since documented further rejections based on the assumption that Syria is now a safe country.⁴⁵ The rejection documents we've seen rely on broad, inaccurate assumptions about Syria's political situation, and asylum seekers report that the transcripts do not reflect the information they provided during

³⁷ Id.

³⁸ Id., page 17

³⁹ Id.

⁴⁰ Id., page 18

⁴¹ Id., pages 18 and 19

⁴² Id., page 18

⁴³ Source:

https://www.unodc.org/documents/justice-and-prison-reform/Nelson_Mandela_Rules-E-book.pdf

⁴⁴ Source:

<https://www.ohchr.org/en/instruments-mechanisms/instruments/basic-principles-use-force-and-firearms-law-enforcement>

⁴⁵ Source:

<https://www.theguardian.com/world/2024/dec/18/bulgaria-syrian-asylum-seekers-return-fall-of-assad>

interviews.⁴⁶ Similarly, *Forced Migration Review* has highlighted how the wide discretion granted to state officials in asylum registration has led to corruption.⁴⁷

This lack of a fair, individualized procedure results in multiple violations of international and European human rights law, particularly regarding the right to due process (Article 6 ECHR, Article 14 ICCPR), the right to asylum (Article 14 UDHR, Article 18 EUCFR), and the right to non-discrimination in asylum procedures (Article 3 of the 1951 Refugee Convention). Testimonies also highlight the abuse of power in Bulgaria's criminal and asylum systems. In February 2024, a respondent with international protection reported that Harmanli police tried to coerce him into signing testimony against an alleged smuggler he did not know - a clear abuse of power. He later learned that two other residents of his reception center had also been coerced into signing.⁴⁸

9. COERCION INTO VOLUNTARY RETURNS

NNK's investigations reveal a systematic pattern of coercion used by Bulgarian authorities to force asylum seekers into signing "voluntary" return agreements. In our recent investigation, 71% of respondents reported such pressure during their asylum procedures.⁴⁹ Many respondents reported being subjected to threats, psychological abuse, and misleading information regarding their asylum claims. Authorities frequently use prolonged detention, inhumane conditions, lack of legal clarity, and direct intimidation to create a sense of hopelessness, compelling individuals to return despite the risks they face in their home countries.⁵⁰ In many cases, asylum seekers were made to sign documents without understanding their contents and were denied access to copies. These coercive tactics appear to be a deliberate strategy to facilitate refoulement while maintaining the facade of voluntary return. The evidence gathered by NNK indicates that these practices may amount to torture under Article 1 of the UNCAT, as they intentionally cause severe mental and physical suffering intending to force individuals to renounce their right to asylum.

⁴⁶ "The Bulgarian Trap: How European Countries Force Asylum Seekers into Abuse". NNK Report, March 2025. Page 24.

<https://bloodyborders.org/wp-content/uploads/2025/03/The-Bulgaria-Trap.pdf>

⁴⁷ Source: <https://www.fmreview.org/ilareva/>

⁴⁸ Source:

<https://bloodyborders.org/testimonials/they-asked-him-to-sign-a-testimony-against-a-person-that-he-didnt-even-know/>

⁴⁹ "The Bulgarian Trap: How European Countries Force Asylum Seekers into Abuse". NNK Report, March 2025. Page 6.

<https://bloodyborders.org/wp-content/uploads/2025/03/The-Bulgaria-Trap.pdf>

⁵⁰ Id., page 39

10. DEATHS AND DISAPPEARANCES

The reality of systemic human rights abuses is reflected in the deaths of 93 people attempting to cross Bulgaria between 2022 and 2023.⁵¹ NNK field reporters, often firsthand witnesses to the violence and neglect behind these deaths, documented a particularly harrowing case in the *Frozen Lives* report (January 2025).⁵² It details how three Egyptian minors were abandoned to die in a Bulgarian forest, despite repeated warnings from human rights defenders. Authorities ignored distress calls and obstructed rescue efforts.⁵³ Evidence suggests border guards were present while one child was still alive. Between July 1, 2024, and January 16, 2025, an independent emergency helpline received 96 distress calls reporting 589 people at risk. Human rights defenders responding discovered nine fatalities (including the three Egyptian boys), though the actual toll is likely higher. Five of the victims were children.

11. HARASSMENT AND INTIMIDATION OF HUMAN RIGHTS DEFENDERS

Activists connected to NNK and other local organizations face severe intimidation when assisting people on the move in Bulgaria, especially when attempting to prevent illegal pushbacks by authorities. Between September and December 2024, 23 activists supporting NNK and Collettivo Rotte Balcaniche were detained.⁵⁴ These detentions involved verbal, psychological, and physical violence, with over 70% lacking access to interpreters or legal counsel. Detainees were often held incommunicado, their devices confiscated, and subjected to abuse without knowing the reasons for their arrest.⁵⁵

In December 2024, during a rescue mission, two female members who were menstruating were denied toilet paper, and one of them was also strip-searched.⁵⁶

⁵¹ Source:

<https://bulgaria.bordermonitoring.eu/2023/12/02/almost-100-people-died-on-their-way-through-bulgaria-within-2-years/>

⁵² “Frozen Lives: an investigation into how Bulgarian authorities put the lives of people on the move at risk of death”. NNK Report, January 2025.

https://bloodyborders.org/wp-content/uploads/2025/01/NNK_Frozen-Lives_25-01-20_2.pdf

⁵³ Id.

⁵⁴ “Frozen Lives: an investigation into how Bulgarian authorities put the lives of people on the move at risk of death”. NNK Report, January 2025.

https://bloodyborders.org/wp-content/uploads/2025/01/NNK_Frozen-Lives_25-01-20_2.pdf

⁵⁵ Id.

⁵⁶ Id.

Another activist was physically attacked while calling their lawyer.⁵⁷ In January 2025, four team members were detained for over 25 hours after calling emergency services to report a group of people in critical condition. Their phones and computers were seized without proper documentation. Coupled with frequent strategic lawsuits against public participation (SLAAPs) that seek to drain resources of civil society actors (including NNK), these actions by Bulgarian authorities aim to silence free speech and hinder lifesaving efforts.

12. RECOMMENDATIONS FOR THE STATE

No Name Kitchen calls upon the Government of Bulgaria to:

1. End violent expulsions and ensure individuals can exercise their right to claim asylum in line with the principle of non-refoulement.
2. Stop the use of police dogs, excessive force, beatings, destruction of property, and coerced signings of documents without translation.
3. Guarantee that asylum seekers have access to fair, transparent, and non-discriminatory asylum procedures that consider individual circumstances.
4. Eradicate torture and other means used to coerce 'voluntary' returns and provide psychological support for those considering a return.
5. Ensure individuals facing expulsion or detention are informed of their rights and reasons for detention, with access to interpreters and legal counsel.
6. Ensure migration detention is used only as a last resort, based on individual and transparent assessments of necessity and proportionality.
7. Improve detention and reception center conditions to meet international and regional standards, including adequate health and social services.
8. End harassment and intimidation of human rights defenders and organizations working on reporting and preventing border violence, ensuring they can work freely without retaliation or violence.
9. Investigate and hold authorities accountable for unlawful actions against asylum seekers and human rights defenders. That includes unlawful actions to obstruct rescue efforts and ill-treatment by staff and police in reception and detention centers.
10. Refuse complicity in European deterrence policies that encourage violations of international human rights standards within Bulgarian territory.

⁵⁷ Id.