

# TransFormWork 2 / Project 101145650

Social partners together towards a better and effective regulation of Artificial Intelligence for a just transition to the work of the future

**First European Round Table  
Dublin, 15 October 2024**

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# Review of AI at the National levels: the case of Bulgaria



## National policies

- The main coordinator of the activities related to the introduction of digital technologies in the economy and society is the Ministry of Transport, Information Technologies and Communications (MTITS).
- A number of national strategic documents exist and they point to different AI related actions:
  1. Under the "Digital Bulgaria 2025" program educational content on information technology in secondary and vocational schools was updated, including the study of AI
  2. Under the National Strategic Document "Digital Transformation of Bulgaria for the period 2020-2030 an analysis will be held in order to outline the challenges for the development of AI in Bulgaria. Following its implementation, a number of interventions will be applied at all levels of the education system to overcome the low level of digital competences and skills of human resources in the country.



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3. The National Strategy for the Development of Scientific Research 2017 – 2030 is connected with the European Roadmap for Scientific Infrastructure research infrastructures which identifies artificial intelligence (AI) as a priority area for analysis and scientific collaborations. That way further initiatives on AI can arise at national level.

4. The "Concept for the development of artificial intelligence (AI) in Bulgaria until 2030." envisages the establishment of a regulatory framework for the development and use of reliable AI in accordance with international regulatory and ethical standards. This Concept emphasizes the need to implement the requirements of EU law in national legislation, including in the area of product safety and legal liability, as well as to ensure mechanisms for their effective compliance. Therefore, after the adoption of the EU regulation on AI, Bulgaria will apply the main principles laid down in the European legislative act, such as respect for fundamental rights, non-discrimination and protection of personal data.

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4. The "Concept for the development of artificial intelligence (AI) in Bulgaria until 2030" also envisages the establishment of an Interdepartmental Working Group to include representatives of key state institutions, regional administrations, the academic community, business and professional associations, as well as related non-governmental organizations. Its task will be to analyze the overall state of the sector and prepare an operational National Plan/road map for the implementation of AI.

5. The government's initiatives to regulate AI are also envisaged under the Digital Decade Council, which is operational since 2022. The Council is "a body of the Council of Ministers for the implementation of comprehensive coordination, cooperation and consultation in the development, implementation, monitoring and evaluation of the state policy in the field of digital transformation".

6. ... and many more sector level initiatives (the most prominent multi- sector business initiative is the AI Cluster Bulgaria which is among the creators of the EU level AI Forum (to be presented during the Discussion part of the panel); another recent sector level initiative is the development of Rules for AI application in the secondary schools).



# Legal advancements

Since March 2024 the Labour code amendments guarantee:

- Improved remote work regime, including better working time tracking through automated system and regulation of occupational health and safety for remote workers.
- Introduction of the right to disconnect for all workers.
- Regulations on algorithms used for remote workers by introducing the right for employees to challenge automated decisions followed by an obligation for human control over all automated decisions.



# Positives and negatives out of the AI deployment

## Positives:

- New AI-based products and services in enterprises can accelerate the digitization of the economy;
- Optimizing the work of employees;
- Eliminating repetitive and monotonous tasks and directing employees to more significant ones;
- Improving customer satisfaction;
- Business process forecasting; quick response to user applications and complaints, but also customization of responses

## Negatives:

- Artificial intelligence and algorithms pose the risk of biased decisions, discrimination and lack of transparency. The presence of discriminatory practices (e.g. against minorities and other vulnerable groups) stem from the set of data underlying the developed algorithm.
- A number of autonomous and intelligent systems are practically constantly online and exposed to new types of attacks and vulnerabilities.
- No sufficient number of applied research activities which can increase the security of the ICT systems used.

# Role of social partners

At the sectoral and branch level, there is still no collective labor agreement dealing explicitly with the application of AI. Indirect reference to regulations can be found in the Collective Labor Agreement for the brewing industry. It envisages employers and trade unions to implement policies and exchange knowledge on the digital transformation of enterprises. In this regard, the envisaged Change Management Teams, which can support information and consultation in connection with digitalization.

However, the existing arrangements in a number of CLAs can be upgraded in order to cover the problem areas in the implementation of AI (e.g. the sections dedicated to (re)qualification of workers, dismissal procedures, implementation of OSH, regulation of trade union activities incl. targeted leaves of trade union leaders for AI trainings/conferences, creation of AI Working Groups/Committees).