



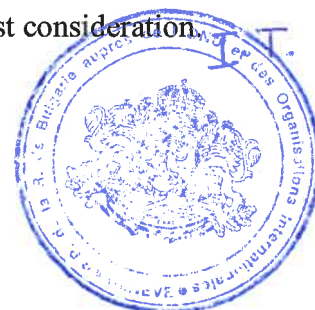
No 47

August 23rd, 2022

The Permanent Mission of the Republic of Bulgaria to the United Nations Office and other international organizations in Geneva presents its compliments to the Secretariat of the United Nations (Office of the United Nations High Commissioner for Human Rights) and with regard to the joint communication under reference AL BGR 01/2022, dated May 26, 2022, issued by the Independent Expert on the enjoyment of all human rights by older persons; the Special Rapporteur on extrajudicial, summary or arbitrary executions and the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health, has the honour to communicate the response provided by the competent Bulgarian authorities (herewith attached).

The Permanent Mission of the Republic of Bulgaria to the United Nations Office and other international organizations in Geneva avails itself of this opportunity to renew to the Secretariat of the United Nations (Office of the United Nations High Commissioner for Human Rights) the assurances of its highest consideration.

Annex: according to text (6 pages).



**OFFICE OF THE HIGH COMMISSIONER
FOR HUMAN RIGHTS**

Special Procedures Branch

Thematic Engagement, Special Procedures and Right to Development Division

GENEVA

INFORMATION BY THE REPUBLIC OF BULGARIA

Regarding Joint Communication from Independent Expert on the enjoyment of all human rights by older persons; the Special Rapporteur on extrajudicial, summary or arbitrary executions and the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health

The Republic of Bulgaria expresses its appreciation to the work of the Independent Expert on the enjoyment of all human rights by older persons; the Special Rapporteur on extrajudicial, summary or arbitrary executions and the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health. The information has been sent to the responsible government bodies. Their views are taken into consideration in the preparation of the present reply.

In response to Communication AL BGR 1/2022, the Government of the Republic of Bulgaria would like to convey the following information:

I. Measures taken by the Bulgarian government to ensure COVID-19 vaccination

1. With Decision № 896/07.12.2020, the Council of Ministers adopted a National Vaccination Plan against COVID-19 in the Republic of Bulgaria. The most at-risk groups of the population were prioritized into five target groups for coverage with the first quantities of vaccines as vaccination is recommended and voluntary. Elderly persons 65 years old and above and persons with underlying medical conditions were included in the Plan as the 4th group due to the more severe course of COVID-19 and the higher risk of developing complications and death, including immunocompromised persons and persons with secondary immune deficiencies.
2. With an Order of the Minister of Health, dated December 27, 2020, national-wide immunisation campaign against COVID-19 was launched. All types of medical and health facilities were included, including the specialised structures of the Ministry of Internal Affairs (MoI) and the Ministry of Defence (MoD). The campaign was essentially organised by the regional health inspectorates at the regional level. The regional governors and the municipal administration, including the health mediators, the Bulgarian Medical Union, the National Health Insurance Fund and the directors of the medical facilities in the territory of the respective regions were obliged to provide assistance in the implementation of the immunisation campaign. In addition, mobile immunisation teams were formed.
3. By decision of the European Commission, the vaccination against COVID-19 in the EU Member States began with quite symbolic quantities of vaccine delivered to Bulgaria on December 27, 2020. Politicians and members of the National Operational Staff for COVID-19 and the National Vaccination Staff were publicly vaccinated in order to urge the population to follow.
4. In January 2021, the quantities of delivered vaccines increased gradually and thus managed to cover the prioritised groups under Phase 1 and 2 according to the Plan

(medical staff, teaching staff and users and social services staff). At the beginning of February 2021, simultaneous vaccination of persons from Phase 2 and Phase 3 (*teaching staff and staff from structures essential to the functioning of society and the state*) were initiated.

5. Vaccination of persons from Phase 4 of the Plan began on February 19, 2021 when sufficient quantities of vaccine were finally available and when the situation allowed for the vaccination of persons aged 65 and over and those with accompanying chronic diseases. It is noteworthy that in the period leading up to the launch of Phase 4, by order of the Ministry of Health, movement restrictions had been imposed at certain times while green corridors were designated specifically for people over 65 years so as to preserve their health and life.
6. With the increased supplies, Decision of the Council of Ministers No. 144/19.02.2021 provided for the opening of other type of green corridors. An opportunity to pre-register for the vaccine was provided to all interested persons in 369 temporary immunisation points. At the time, COVID-19 vaccines were distributed to all regional health inspectorates, based on the number of population and from there to every temporary immunisation point in the country, to ensure equal access to vaccine for everyone, regardless of their residence.
7. In line with domestic legislation, all vaccines, including those against COVID-19, are administered in strict compliance with the requirements of the product's characteristics regarding method of administration, dosage, intervals between administrations, compatibilities, potential reactions with other medicinal products, etc.
8. According to data from the vaccination register, as of April 30, 2020 about 46% of the doses of the vaccine against COVID-19 administered in the country had been given to people over 60 years old. The data published on the website of the European Centre for Disease Prevention and Control (ECDC), since the beginning of the supply of vaccines against COVID-19, shows that they have also been administered to persons aged 60 and over¹.
9. At present, 61.7% of the population over 60 years of age has completed the vaccination course². In comparison, by the end of 2021, the scope of completed vaccination course in this age group was 35.2%. The rising number shows that the measures taken the Bulgarian government have an effect and lead to an increase in vaccination of the elderly.
10. Achieving high vaccination coverage is a priority national goal, recognized by all political forces, administrative agencies, private business and society. Targeted and coordinated efforts will continue to be taken by all state institutions to increase the coverage and protection of the most at-risk groups of the population - the elderly and persons with underlying medical conditions.

¹ Data_sheet_ECDC_2020-2021 in the Annex.

² Source: <https://vaccinetracker.ecdc.europa.eu/public/extensions/COVID-19/vaccine-tracker.html#age-group-tab>

II. Information on the steps being taken by the Government to ensure that older persons and people with underlying health conditions be effectively and efficiently protected against the coronavirus, including through access to COVID-19 vaccines, in line with Bulgaria's obligations under international human rights law

11. At the time of preparation of the National Vaccination Plan, the existing strategic documents of the World Health Organisation (WHO) and the European Centre for Disease Prevention and Control (ECDC) served as reference documents, namely:
 - Strategic considerations in preparing for the deployment of a vaccine against COVID-19 and vaccination in the WHO European Region³;
 - Framework for vaccine allocation and prioritization of vaccination against COVID-19, prepared by the WHO Strategic Advisory Group on Immunization⁴.
12. The adopted document stipulated that due to (by that time) insufficient production capacity and unprecedented global demand, availability of and access to COVID-19 vaccines is expected to be limited in the initial stages after vaccine licensure. Therefore, it was crucial for vaccines to be distributed equitably on evidence-based decisions and considering national specificities. In addition to the general principles (*general well-being, equality, etc.*), the differentiating healthcare systems between countries and their respective needs (*societal, geographic, etc.*) were taken into account.
13. Additionally, as greater vaccine availability was achieved, vaccination strategies and their targets were adjusted accordingly. Initially, the applied strategies focused on the need to reduce mortality and protect the health and socio-economic burden of the COVID-19 pandemic and on ensuring continuity of essential services.
14. The National Vaccination Plan defines priority groups of the population, based on epidemiological and ethical criteria:
 - increased risk of infection due to the nature of the activity performed;
 - increased risk of severe course or death due to accompanying chronic diseases, related or not with advanced age;
 - increased risk for the functioning of activities and sectors essential to public life due to high morbidity;
 - absence of workers in the abovementioned sectors.
15. The decisions for priority access were based on two criteria: *protection of the most vulnerable groups and individuals and slowing down and eventually stopping the spread*

³ More information: <https://www.euro.who.int/en/health-topics/disease-prevention/vaccines-and-immunization/publications/2020/strategic-considerations-in-preparing-for-deployment-of-covid-19-vaccine-and-vaccination-in-the-who-european-region-9-october-2020-produced-by-who-europe>

⁴ More information: https://apps.who.int/iris/bitstream/handle/10665/334299/WHO-2019-nCoV-SAGE_Framework-Allocation_and_prioritization-2020.1-eng.pdf?sequence=1&isAllowed=y

of the disease. For instance, persons with accompanying chronic diseases were included in phase IV of the Plan, as EU recommendations and scientific data had been used to support this decision.

16. On October 15, 2020, the European Commission published a communication to the European Parliament and the Council on preparedness for strategies and deployment of vaccines against COVID-19, which presents the key elements for Member States to consider when preparing their vaccination plans. As of November 30, 2020, nine out of 31 countries have published interim recommendations for priority groups for vaccination, with the most common target groups being the elderly, healthcare workers and people with co-morbidities⁵. Item 4 lists the possible priority groups of the population in the initial stages of vaccine implementation.
17. Scientifically substantiated until the present day remains the statement that chronically ill persons with cardiovascular and pulmonary diseases, metabolic diseases, etc. are most at risk of severe course and lethal end.
18. However, it cannot be argued that persons over 60 years of age were discriminated against and had their rights violated due to the fact that the focus has been put on those, who have the greatest potential to spread the infection due to their occupation (*medical, pedagogical and social staff*) among persons from vulnerable groups (*persons with accompanying diseases, elderly persons and children, for whom data on their participation in the epidemic chain was accumulated much later*).
19. The pace of vaccination has depended on three main prerequisites, which are interrelated:
 - availability of safe and effective vaccines and their rhythmic delivery in the country, according to the agreed quantities and terms;
 - conditions and possibilities for the application of the delivered vaccines against COVID-19;
 - conducting a targeted communication campaign based on scientific facts and evidence and sending clear messages to different groups of society about the importance and benefit of vaccination against COVID-19 For the formation of individual and collective immunity.

III. Information on measures being taken by the Government to advertise the website "Plus Me" and share evidence and scientific based information about available health goods,, incl. vaccines, against the coronavirus, incl. in view of the detailed information mentioned in the Government's reply to the European Committee of Social Rights

20. The Ministry of Health has been conducting an information campaign "Plus me" regarding the health risks of contracting SARS-CoV-2 and getting sick, the benefits of vaccination against the coronavirus infection and the stimulation of the vaccination

⁵ More information: <https://eur-lex.europa.eu/legal-content/BG/TXT/PDF/?uri=CELEX:52020DC0680&from=EN>

process in the country. The campaign started on March 21, 2022, in implementation of the National Operational Plan to deal with the COVID-19 pandemic, approved by the Council of Ministers on January 13, 2022, and will continue until the WHO declares the end of the pandemic.

21. The campaign has been fully supported by healthcare sector. Experts, academics, associations and unions, the media and the non-governmental sector, the Bulgarian Red Cross, the National Network of Health Mediators, the National Council of Religious Communities in Bulgaria, the National Association of Municipalities and many more – all came together to promote awareness of Bulgarian citizens towards the safety and efficiency of vaccines, the risk of the occurrence of complications after a relapse of COVID-19, which could be prevented through vaccination.
22. The campaign is already recognisable by Bulgarian citizens due to the collective efforts of the partners, social networks and the official website, where scientific-based information about the disease and vaccine prevention is available and subject to daily updating. Statistical data on the administered vaccines by age group and place of is also available.
23. Quick and easy access is ensured to facilitate the making of informed choices regarding vaccination informed choices about vaccination. Targeted information is available in the form of articles, scientific publications, interviews, videos, digital brochures, infographics, etc. It is intended primarily for people at increased risk of severe illness.⁶
24. Digital brochures and texts are prepared by Ministry of Health experts concerning health conditions, as well as answer citizens' vaccination questions. In order to reach general practitioners, the Ministry of Health together with the National Platform for Health Communication CredoWeb are organizing a series of thematic discussions, for example, the virtual meeting on the topic "*Vaccines against COVID-19 in chronically ill and children - science-based facts*", in which nearly 600 general practitioners participated. Further discussions on the vaccination of people with autoimmune diseases, diabetes and other conditions are also in the making.
25. Regarding the work with vulnerable groups, discussions with the National Network of Health Mediators are being organised to dispel fears and myths about vaccination in the community.
26. Additionally, more than 30 video materials have been filmed so far where prominent Bulgarian doctors explain the benefits of vaccination for the various risk groups.⁷ Spreading the recovered from COVID-19 persons perspective is essential in order to give publicity to the real stories of affected persons, as a counterpoint to the false information spread mainly on the Internet and social networks. On the other hand,

⁶ e.g. those suffering from specific underlying/co-morbidities – chronic lung or cardiovascular diseases, diabetes, etc., for women planning a pregnancy, pregnant, lactating women, performing in vitro procedures, for the elderly, for children and young people, for persons in whose professions the risk of infection is higher due to the nature of the work performed, etc.

⁷ Over 10 materials are actually personal stories. Apart from them, the MoH team also conducts in-depth interviews with doctors.

discourse with GPs and those working in the emergency care system better equip the medical personnel for answering patients' questions.

27. Discussions with students within the framework of cooperation between the Ministry of Health and the Higher Education Institution are being held as well.
28. Audio-visual materials have been provided to the Metropolitan Railway and the National Association of Municipalities in the Republic of Bulgaria to attract people's attention to the cause. Another video material is currently in the making.
29. Other sources of information recognised by society as reliable⁸ are also being updated and upgraded on a regular basis.

IV. Statistical information and data

30. Statistical information and data is available in the Annex of the present reply. The document presents the latest available data as of June 2022, regarding persons over 60 years of age vaccinated in Bulgaria since the beginning of the campaign (including the ratio among vaccinated adults over 60 in cities and villages), as well as deaths among vaccinated and unvaccinated elderly from March 2020 to date.

Sofia
August 2022

⁸ More information: www.coronavirus.bg