[BG] The code of conduct for the protection of children entered into force

IRIS 2023-4:1/18

Nikola Stoychev
Dimitrov, Petrov & Co., Law Firm

On 1 February 2023, *Кодексът за поведение относно мерките за оценка, означаване и ограничаване на достъпа до предавания, които са неблагоприятни или създават опасност от увреждане на физическото, психическото, нравственото и/или социалното развитие на децата* (the Code of Conduct on Measures to Assess, Label and Restrict Access to Programmes which are Harmful or Pose a Risk to Affect Adversely the Physical, Mental, Moral and/or Social Development of Children – the Code) entered into force. The Code was adopted by CEM pursuant to Decision No. RD-05-7 dated 12 January 2023.

The Code has been prepared jointly by *Съветът за електронни медии* (the Council for Electronic Media – CEM) and the Association of Bulgarian Radio and Television Broadcasters (ABBRO), the Bulgarian National Television (BNT) and the Bulgarian National Radio (BNR) in accordance with the Radio and Television Act.

The Code is a form of co-regulation and its aim is to protect child audiences within the meaning of the Radio and Television Act and Directive 2018/1808. It does not limit the application of other legislative acts in the field of child protection (such as the Child Protection Act, for example).

The Code is binding on all media service providers – linear and non-linear, under the jurisdiction of the Republic of Bulgaria. It replaces all secondary legal acts in the field concerning child protection and adds some novelties arising from the AVMSD. Effective measures to assess, label/categorize content and restrict access of children to broadcasts and user-generated videos which may be harmful or pose risks whichadversely affect children's development are implemented in the newly-adopted Code.

All media service providers remain obliged to observe special rules concerning the participation of children in programmes (except for movies and series). There is a list of 25 points indicating what types of activities including children are restricted.

There are no significant changes for linear services within the Code – they should still categorize/place pictograms for programmes (with specific provisions stipulated in the Code), and comply with all restrictions concerning advertising, etc.

© European Audiovisual Observatory (Council of Europe) 2026

Non-linear service providers will be obliged for the first time to categorize programmes in accordance with the Code. They may adopt additional measures for the protection of children and upon assessment may restrict access to the services to persons above the age of 18 to guarantee that only adults have access, etc.

Special provisions of the Code will also be mandatory for video-sharing platform services (VSPs) under Bulgarian jurisdiction. For example: VSPs's general terms and conditions (GTC) will be subject to pre-approval of the CEM and these GTC will have to include restrictions for users to play, upload or in any way distribute certain content (e.g. pornographic content, victims bodies, content which violates the law, content which shows violence and others). The GTC should also include an obligation for users to immediately notify the VSPs about content which is in breach of the Code and the GTC. Among other things, the GTC should also oblige users to indicate when content includes audiovisual commercial communications - e.g. product placement, sponsorship, etc.

Кодекс за поведение относно мерките за оценка, означаване и ограничаване на достъпа до предавания, които са неблагоприятни или създават опасност от увреждане на физическото, психическото, нравственото и/или социалното развитие на децата

https://cem.bg/files/1673946952_code__17a.pdf

Code of Conduct on Measures to Assess, Label and Restrict Access to Programmes which are Harmful or Pose a Risk to Affect Adversely the Physical, Mental, Moral and/or Social Development of Children – the Code of Conduct

Решение № РД-05-7 от 12 януари 2023 г. на СЕМ

https://www.cem.bg/actbg/6228

Decision No. RD-05-7 dated 12 January 2023 adopted by CEM

© European Audiovisual Observatory (Council of Europe) 2026

© European Audiovisual Observatory (Council of Europe) 2026