

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

2nd European Round Table
Bologna, 27 March 2025

Review of AI at the National Level: the case of Bulgaria



National policies

- Despite the numerous national strategic documents for speeding up the AI deployment, there is no tripartite group for managing the AI transition and monitoring the effects of it. Sector- level initiatives emerge (like 1) VELES Excellence Hub on elevating healthcare innovation excellence in South-East Europe and 2) development of Rules for AI application in the secondary schools) but no large-scale government led action occurs.
- Since 2024 the Labour Code amendments regulate algorithms used for remote workers (right to challenge automated decisions and an obligation for human control over all automated decisions). Yet, no large scale (to all employees) rights guaranteed with regard to algorithms. No Labour Code amendments made in terms of AI deployment at the workplace.



Social partners' policies

- Sector- level collective agreements still do not deal explicitly with the application of AI. Indirect reference to regulations can be found in the Collective Labor Agreement for the brewing industry (requiring Change Management Teams establishment for dealing with digitalization). CBA clauses also in bank sector when digitalization leads to lay-offs. First steps towards AI regulations taken by the Light Industry CITUB union as well (draft CBA clauses under discussion with company unions).
- No social partners' large-scale initiatives observed (after the failure of signing a bipartite agreement between national level employers and workers' organizations under the CITUB initiative). Implementation of such initiatives is questionable as AI and Algorithms is not yet well studied by sector level union organizations while employers count mainly on government mediated dialogue (especially with regard to forthcoming AI regulations like the AI Act).



Social partners' policies: preliminary findings

Challenges out of AI deployment:

- Data collection and aggregation is not fast and sustainable enough to ensure greater AI deployment.
- AI can ease work processes (lower workload) and compensate for missing workforce. Creative potential can be unleashed but problems may arise as well (lower wages and no need of less qualified workers).
- AI does not impact employment level at the moment but already leads to changes in occupation structure within companies.
- HR Algorithms are still costly and mainly deployed by big companies within certain sectors. Algorithms are mainly integrated in hiring processes. AI can be very useful in on-boarding practices and education practices in companies. However it is not yet capable of taking decisions and humans shall monitor and verify its decisions.
- AI shall be regulated but no tripartite government led initiatives are observed.



Social partners' policies: preliminary findings

Policy pointers:

- Social partners can start a campaign towards establishment of a tripartite group and having a national level AI policies (not fragmented actions by sectors). It is of utmost importance in terms of the AI Act proper and timely transposition.
- AI ambassador can be elected to guarantee Bulgarian AI initiatives are competitive to international ones.
- AI generated unemployment is a possible future scenario and government strategies for tackling unemployment are highly needed.

Social partners' policies: preliminary findings

Policy pointers:

- Importance of regulations to be put in place in terms of collecting, aggregating and sharing data for developing AI models. That way profitable business initiatives can be encouraged and economy profit seen. AI regulation can be perceived as a competitive advantage among other EU players.
- AI education programs shall be equally made available to anyone on company level so that no one is left behind. HR managers shall guarantee education opportunities to everyone. Education programs can address cyber security threats and data privacy risks as well. Moreover, AI is not perfect and thus greater knowledge is needed on how to properly use it and find the mistakes it makes.



Social partners' policies: preliminary findings

Policy pointers:

- Social dialogue on AI regulation in early phases. Legal framework can support it by laying down the main principles on negotiations. Possible areas to be covered by CBA: information procedures (with confidentiality presumption determined in advance), measures towards negative employment outcomes, education outreach and etc.
- Social dialogue can address the black box matter too: adaptive AI models or automated decisions? If algorithms are capable to go beyond the data they are trained on then how do they judge? Possible establishment of a monitoring body for a) AI induced discrimination and higher work pressure and b) categorization of risky AI applications where the potential for harm is high.
- Not only CBA advancements needed but an overall regulation of the negotiation process towards CBA conclusion. If AI is potentially applicable in CBA negotiations there is a need to regulate communication between bargaining parties (especially when negotiating algorithms are adopted).