To

The Scientific Jury for the Procedure for Appointment to the Academic Position of "Professor" in Professional Field 3.6 Law, Scientific Specialty "Labour Law and Social Security Law," Institute for the State and the Law at the Bulgarian Academy of Sciences, announced in State Gazette, issue No. 24 of 06.03.2026

OPINION

by

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Dear Colleagues,

Pursuant to Article 4 in conjunction with Article 29a, paragraph 1 of the Act on the Development of Academic Staff in the Republic of Bulgaria and Article 71 of the Rules and Regulations for the Acquisition of Academic Degrees and the Occupation of Academic Positions at the Institute for the State and the Law at the Bulgarian Academy of Sciences, I have been appointed as a member of the scientific jury for the procedure announced in State Gazette, issue No. 24 of 06.03.2026 for appointment to the academic position of "Professor" in Professional Field 3.6 "Law," Scientific Specialty "Labour Law and Social Security Law." On 07.05.2026, the first meeting of the scientific jury for the announced procedure was held, at which I was assigned the preparation of the present opinion.

I. General Remarks

1. One candidate is participating in the announced procedure for appointment to the academic position of "Professor": Assoc. Prof. Andrey Sashov Alexandrov, PhD, Civil Law Sciences Section, Institute for the State and the Law – BAS.

2. Assoc. Prof. Alexandrov graduated in "Law" in 2005 from Sofia University "St. Kliment Ohridski". In 2011, at the same higher education institution, he obtained the educational and scientific degree "Doctor" in Labour Law and Social Security Law. In 2016, he was appointed as Chief Assistant at the Institute for the State and the Law – BAS, and in the following year

he was elected Associate Professor. Since 2020, he has been teaching the academic disciplines "Labour Law" and "Social Security Law" at South-West University "Neofit Rilski". He practices as an attorney-at-law, successfully combining theoretical knowledge with practical experience.

3. For participation in the procedure, the candidate has submitted numerous scholarly works, including monographs, studies and articles, reports, and chapters in collective monographs. The monograph **Problems of Labour Relations under a Declared State of Emergency or a Declared Emergency Epidemic Situation**, Sofia: Spotinov Print, 2022, 196 pages, ISBN (print) 978-619-188-795-8, has been submitted as the habilitation thesis. The present opinion will focus on the habilitation thesis, while also addressing other scholarly works by Assoc. Prof. Alexandrov, without any claim to exhaustiveness.

II. Personal Characteristics of the Candidate

I have personally known Assoc. Prof. Andrey Alexandrov for years, which is an easily verifiable and ascertainable fact. This is confirmed both by our joint participation in research projects and by articles and studies published in co-authorship, as well as by a number of my scholarly works in which he participated in the capacity of reviewer. My impressions from our professional and academic collaboration are exceptionally positive. In his work, Assoc. Prof. Alexandrov has invariably demonstrated a high degree of integrity, academic conscientiousness, and responsibility, always fulfilling his commitments with quality and within the established deadlines. His ability to conduct independent and in-depth scholarly research is beyond any doubt in my view. He possesses a distinctly analytical approach, the ability to critically assess existing scholarly positions, and the capacity to formulate original and well-reasoned academic theses. His research in the field of labour law is distinguished by consistency, relevance, and a high degree of scholarly substantiation, which naturally establishes him as a recognizable and authoritative specialist within professional and academic circles.

The scholarly expertise of Assoc. Prof. Alexandrov is also reflected in his substantial scientific output in terms of both volume and content, including monographs, studies, articles, and participation in collective scholarly works devoted to current and significant issues in labour law scholarship. In his publications, he demonstrates profound knowledge of both the national legal framework and judicial practice, as well as European and international standards in the field of labour law. His scholarly contributions are characterized by a high professional standard, consistency in research interests, and a commitment to the development of contemporary legal doctrine.

A particularly valuable aspect of his work is the successful combination of scholarly activity with the practical application of legal knowledge. In his research, Assoc. Prof. Alexandrov does not limit himself solely to theoretical analysis, but consistently seeks the connection between legal theory, legislative developments, and the needs of legal practice. It is precisely this ability to integrate the scholarly approach with the practical dimensions of labour law that gives his works significant practical value and makes them useful both to the academic community and to practicing lawyers, institutions, and specialists in the field of labour relations.

III. Fulfilment of the Legal Requirements for Occupying the Academic Position of "Professor"

Andrey Alexandrov fulfils all requirements under the Act on the Development of Academic Staff in the Republic of Bulgaria for occupying the academic position of "Professor" – he has held the academic position of "Associate Professor" for more than two years and has obtained the educational and scientific degree "Doctor" in the scientific specialty "Labour Law and Social Security Law." He has served as the academic supervisor of a successfully defended doctoral candidate, thereby satisfying the specific requirement under Article 71, paragraph 3, item 4 of the Rules and Regulations for the Acquisition of Academic Degrees and the Occupation of Academic Positions at the Institute for the State and the Law at the Bulgarian Academy of Sciences. He has submitted a reference declaration regarding compliance with the minimum national requirements for occupying the academic position of "Professor." It demonstrates a significant exceeding of the minimum required indicators in all groups (often several times over, for example with regard to citations).

There has been no plagiarism or unreliability of the submitted scientific data in the scholarly works established in accordance with the legally prescribed procedure; nor have I identified any such indications in the course of reviewing the scholarly works submitted in the present procedure.

IV. Substantive Characteristics of the Submitted Monographic Work "Problems of Labour Relations under a Declared State of Emergency or a Declared Emergency Epidemic Situation"

The monograph comprises 196 pages and represents the first independent monographic study in Bulgarian legal literature devoted entirely to the legal problems of labour relations under a declared state of emergency and a declared emergency epidemic situation. Even at the time of its publication, the topic was distinguished by a particularly high degree of public and scholarly relevance, determined by the dynamic legislative changes, the need for the rapid

adaptation of labour law regulation to crisis conditions, and the serious practical difficulties arising in the application of the new normative solutions. It was precisely in this complex social and legal context that the research of Assoc. Prof. Andrey Alexandrov stood out as a timely, in-depth, and scientifically substantiated work, providing the necessary theoretical framework for understanding the processes taking place in labour law during the period 2020–2021. Rereading the work as of today, I continue to hold the opinion that it constitutes a valuable and enduringly significant part of Bulgarian labour law literature, having lost neither its scholarly value nor its practical applicability. Although at present society is not confronted with the immediate threat of a pandemic crisis, the development of contemporary social relations clearly demonstrates that the state and the legal order remain exposed to various risks and crisis situations — social, economic, military, technological, and demographic. In this sense, the study transcends the framework of the specific historical situation caused by COVID-19 and acquires broader significance as a scholarly analysis of the functioning of labour law under conditions of emergency and restriction of the normal social rhythm.

It is precisely here that the author's foresight becomes evident, as he does not limit himself to describing and analyzing temporary legislative solutions, but succeeds in deriving universally valid theoretical and practically applicable conclusions regarding the limits of permissible interference with labour rights, the balance between public interest and the protection of workers and employees, as well as the need for normative predictability under crisis conditions. Quite reasonably, Assoc. Prof. Alexandrov characterizes part of the adopted legislative solutions as a manifestation of "anti-crisis" labour legislation, the weaknesses of which should be acknowledged in order to avoid their reproduction in future emergency situations.

The work is properly structured, logically coherent, and methodologically sound. It clearly formulates the principal scholarly objectives, which correspond directly to the applied research methodology and allow for their comprehensive fulfilment. The author successfully combines normative analysis, critical review of legislative solutions, examination of judicial practice, and a doctrinal approach, thereby providing the monograph with the necessary scholarly depth and persuasiveness. The consistency of the exposition and the precise systematization of the issues examined facilitate the understanding of the author's theses and contribute to the high quality of the scholarly research.

In my assessment, the analyses concerning remote forms of employment — home-based work and telework, the issues of part-time work and overtime work, the regime of paid annual leave, as well as the examination of unpaid leave under Article 160, paragraph 1 of the Labour Code,

are particularly contributory in nature. In these sections, the author not only analyzes the applicable legal framework but also persuasively reveals its contradictions, practical deficiencies, and the need for improvement. Particularly valuable is Assoc. Prof. Alexandrov's effort to propose specific de lege ferenda solutions regarding the provisions of the Labour Code adopted in connection with the state of emergency and the emergency epidemic situation. It is precisely these proposals that give the work significant practical value and demonstrate the author's ability to combine theoretical analysis with the practical needs of legal regulation.

I also fully share the author's conclusions regarding the need for modernization and digitalization of adjudication in labour disputes. Although scholarly discussion on these issues continues to this day, the monograph examines the problem from a particularly interesting and original perspective — that of a crisis situation in which the protection of labour rights simultaneously increases in importance and becomes more difficult due to the limited functioning of institutions and the complicated access to justice. It is precisely in this part that the author convincingly demonstrates his ability to derive principled and long-term valid conclusions from a specific and dynamic social situation.

For these reasons, the monograph should be assessed as an unquestionably valuable scholarly work both for the theory of labour law and for legal practice. It combines a high degree of scholarly depth, relevance of the research subject, practically useful conclusions, and a clear authorial position on a number of debatable issues, which places it among the significant contemporary studies in Bulgarian labour law doctrine.

V. Other Scholarly Research of Assoc. Prof. Andrey Alexandrov Submitted in the Procedure

The candidate has submitted a substantial body of scholarly work in the procedure (in addition to the monograph, a further 52 articles, 7 studies, and 4 chapters in collective monographs), which does not permit the review of each individual work. If such an analysis were attempted, at the very least the length of the opinion would significantly exceed generally accepted practice. I consider that Assoc. Prof. Alexandrov has appropriately grouped his research into thematic categories, which facilitates the work of the members of the scientific jury:

- Articles and studies devoted to the digitalization of documents of labour law significance;

- Articles devoted to various aspects of personal data protection;

• Research in the field of protection against discrimination and harassment in the workplace;

• Research devoted to other labour law issues such as the legal regime of remuneration for work, paid annual leave, and termination of employment relationships;

• Analyses of procedural aspects in the examination of labour disputes and adjudication in labour cases;

• A group of publications devoted to the "quality of legislation" (or rather to its absence).

The distinguished thematic groups clearly outline the breadth of the candidate's scholarly interests and at the same time demonstrate their internal consistency and logical interconnectedness. Particularly impressive are the publications devoted to the digitalization of documents of labour law significance, the various aspects of personal data protection, the problems of discrimination and harassment in the workplace, as well as the analyses related to remuneration for work, working time, leave, termination of employment relationships, and the procedural aspects of the examination of labour disputes. The publications devoted to the quality of legislation and to the problems arising from the inconsistency and insufficient precision of the normative framework are also of significant scholarly interest. It is noteworthy that the author's scholarly productivity directly corresponds to the principal and most topical labour law issues of the present day. His research pursuits are directed toward topics that are simultaneously theoretically significant and practically sensitive for contemporary labour relations — the digitalization of labour, the protection of the personality of workers and employees, new forms of employment, access to justice, and the effectiveness of legal protection. In this sense, the scholarly activity of Assoc. Prof. Alexandrov demonstrates a high degree of relevance, sensitivity to social processes, and the ability for timely scholarly interpretation of the dynamically changing legal environment.

At the same time, his orientation toward contemporary problems of labour law in no way signifies a departure from the traditions of Bulgarian legal doctrine. On the contrary, in his research the author clearly demonstrates profound knowledge of the classical achievements of labour law scholarship and consistently builds upon established doctrinal positions. It is precisely on this stable theoretical foundation that he develops his own scholarly theses, expanding, updating, and advancing them in accordance with contemporary social and legal realities. This continuity between tradition and modernity is particularly valuable, as it

demonstrates scholarly maturity, respect for what has already been achieved in legal theory, and at the same time the ability to develop and adapt it to new challenges.

All submitted publications are distinguished not only by theoretical contributions but also by clearly expressed practical contributions. The theses advanced by the author are consistently and convincingly substantiated, while the proposals for improving legislation are characterized by realism, balance, and sound consideration of the needs of legal practice. A particularly positive impression is created by the precise legal language employed, which in a number of publications is presented in a manner allowing the complex subject matter to be understood by a broader range of readers beyond the narrow professional circles.

His comparatively limited number of publications in the field of social security law reveal considerable scholarly potential and promise. Particular attention should be paid to the analyses concerning long-term care for the elderly as an insured social risk, as well as the research on the relationship between the minimum wage and the maximum social security income threshold. In these works, the ability of Assoc. Prof. Alexandrov continuously to expand his scholarly interests, enrich them with new problematic fields, and create scholarly output that undoubtedly contributes to the development and modernization of Bulgarian legal doctrine is clearly evident.

VI. Critical Remarks and Recommendations

It is customary for opinions to include certain critical remarks regarding the submitted works, as well as recommendations to the author.

My recommendation to the candidate is to direct his publication activity toward journals indexed in Scopus and Web of Science, so that his research activity may acquire even greater international visibility.

VII. General Assessment and Conclusion

The scholarly publications of Assoc. Prof. Andrey Alexandrov submitted for the purposes of the present procedure convincingly demonstrate his ability to study in depth, consistently, and with the necessary scholarly precision the issues toward which he has directed his research interests. The submitted works clearly reveal a high degree of theoretical preparation, excellent knowledge of the national and European legal framework, the ability to critically analyze legislation and judicial practice, as well as the capacity to formulate independent scholarly conclusions and well-reasoned de lege ferenda proposals.

The publications submitted for participation in the procedure not only formally satisfy the established quantitative indicators but significantly exceed them both in volume and in their scholarly quality, thematic relevance, and practical significance. They outline a candidate with clearly developed and sustained scholarly interests, a high degree of academic productivity, and a consistent presence within contemporary Bulgarian labour law doctrine. It is particularly important that the scholarly activity of Assoc. Prof. Alexandrov is not limited to the accumulation of publication activity, but reveals a consistently developed research concept within which the individual works are in logical and thematic interconnection and mutually complement one another.

The overall assessment of the set of indicators by which the candidate should be evaluated — scholarly output, scholarly contributions, relevance of the research, practical applicability, participation in academic life, and authority within the professional community — is unquestionably exceptionally high. The accumulated scholarly output testifies not only to intensive academic activity but also to scholarly maturity, consistency of research interests, and the ability for sustained development of legal theory in the field of labour and social security law. Significant importance should also be attached to the circumstance that the author's works consistently combine high theoretical value with a distinct practical orientation, which substantially increases their usefulness both for scholarship and for legal practice.

In addition, it should be emphasized that Assoc. Prof. Alexandrov has established himself as a recognizable and authoritative researcher whose scholarly works are distinguished by originality, sound argumentation, and relevance. His scholarly work demonstrates the ability not only to analyze existing problems of labour law but also to propose solutions consistent with the development of social relations, European trends, and the need for modernization of the Bulgarian legal framework.

On the basis of all the foregoing, I firmly and without hesitation express my opinion that the candidate fully satisfies, and to a significant extent exceeds, the requirements for occupying the academic position of "Professor" introduced by the Act on the Development of Academic Staff in the Republic of Bulgaria, the Regulations for its implementation, as well as the Rules and Regulations for the Acquisition of Academic Degrees and the Occupation of Academic Positions at the Institute for the State and the Law at the Bulgarian Academy of Sciences.

Having collectively assessed the candidate's research activity, in my capacity as a member of the scientific jury under Article 25 of the Act on the Development of Academic Staff in the Republic of Bulgaria, I give a POSITIVE ASSESSMENT of the candidacy of Assoc. Prof. Andrey Sashov Alexandrov, PhD, for occupying the academic position of "Professor" in

Professional Field 3.6 Law, Scientific Specialty "Labour Law and Social Security Law" for the needs of the Institute for the State and the Law – BAS, and I propose that the scientific jury adopt a decision proposing that the Scientific Council of the Institute for the State and the Law elect Assoc. Prof. Alexandrov as Professor.

20.05.2026

Varna

Respectfully, ...

Prof. Andriyana Andreeva, PhD