To
The Scientific Jury
at the Institute for the State and the Law
at the Bulgarian Academy of Sciences
Sofia

R E V I E W

by Assoc. Prof. Rayna Moskova Koycheva, PhD, scientific specialty "Labour Law and Social Security", Faculty of Law, University of National and World Economy, Sofia, appointed by Order No. RD-09-45/01.04.2026 of the Director of the Institute for the State and the Law at the Bulgarian Academy of Sciences as a member of the scientific jury in the competition for the academic position of
"Professor"
in professional field 3.6 "Law", scientific specialty 05.05.10 "Labour Law and Social Security", with the sole candidate **Andrey Sashov Alexandrov**

Dear Members of the Scientific Jury,

Having familiarized myself with the materials submitted by the candidate, I hereby present my review for your consideration.

1. Information about the competition

The competition was announced for the needs of the "Civil Law Studies" Section of the Institute for the State and the Law at the Bulgarian Academy of Sciences in State Gazette, issue No. 24 of 06.03.2026.

2. Information about the candidates in the competition

Only one candidate submitted documents for participation in the competition within the prescribed time limit – Assoc. Prof. Andrey Sashov Alexandrov, PhD,

from the “Civil Law Studies” Section of the Institute for the State and the Law at the Bulgarian Academy of Sciences. He submitted all necessary documents for participation in the competition within the prescribed time limit.

Andrey Alexandrov graduated in Law from the Faculty of Law of Sofia University “St. Kliment Ohridski” in 2005.

In 2011, he acquired the educational and scientific degree “Doctor” as a full-time doctoral student at the Department of Labour and Social Security Law of the Faculty of Law of Sofia University “St. Kliment Ohridski”.

During the period 2011–2015, he was a part-time lecturer at Sofia University “St. Kliment Ohridski”, Faculty of Law, Department of Labour and Social Security Law.

Since 2017, he has been an Associate Professor under a primary employment contract at the Institute for the State and the Law at the Bulgarian Academy of Sciences.

Since 2020, he has also been an Associate Professor of Labour Law and Social Security at South-West University “Neofit Rilski” under an employment contract for external secondary employment.

Assoc. Prof. Andrey Alexandrov, PhD, combines his academic work with legal practice, initially as legal counsel at the State Commission on Information Security, and since 2008 to date – as Director of the Labour Law and Migration Directorate at Kambourov & Partners Law Firm.

For more than ten years now, Assoc. Prof. Andrey Alexandrov, PhD, has participated as a lecturer in numerous practical training courses on topical issues of labour and social security law, organized by various training organizations.

3. Fulfilment of the Requirements for the Academic Position of Professor

Based on the submitted documents, Assoc. Prof. Andrey Sashov Alexandrov, PhD, satisfies the quantitative and qualitative requirements for appointment to the academic position of Professor under Articles 2b, 29 and 29b of the Academic Staff Development in the Republic of Bulgaria Act (ASDRBA), Articles

1a and 60 of the Regulations for the Implementation of the ASDRBA, as well as the requirements set forth in the Rules and Procedures for the Acquisition of Academic Degrees and Appointment to Academic Positions at the Institute for the State and the Law.

3.1. Assessment of Compliance with the Requirements of the ASDRBA and its Implementing Regulations

According to the declaration submitted by the candidate regarding the minimum scientific requirements for appointment to the academic position of Professor, he significantly exceeds the minimum requirements established by the ASDRBA and its Implementing Regulations. While a total of 450 points is required under indicator groups A to E, the candidate has accumulated a total of 2,325 points.

For the purposes of this competition, Assoc. Prof. Andrey Alexandrov has submitted one monograph, fifty-two articles, seven studies, and four chapters in collective monographs. None of the submitted publications was used in the procedure for his appointment to the academic position of Associate Professor.

Assoc. Prof. Andrey Alexandrov has recorded 111 citations in monographs and peer-reviewed collective volumes, as well as 47 citations in non-indexed peer-reviewed journals.

Assoc. Prof. Andrey Alexandrov has supervised two successfully defended doctoral candidates and has participated in six national research projects and one international educational project.

3.2. Assessment of Compliance with the Additional Indicators under Article 71(12) of the Rules and Procedures for the Acquisition of Academic Degrees and Appointment to Academic Positions at the Institute for the State and the Law

The report submitted by the candidate regarding compliance with the additional indicators under Article 71(12) of the Rules and Procedures for the Acquisition of Academic Degrees and Appointment to Academic Positions at the Institute for the State and the Law demonstrates that he also fulfils a substantial portion of these additional criteria.

Although the Rules provide that these additional indicators are to be taken into consideration only in the event of equal results among candidates, which is not the case here since Assoc. Prof. Andrey Alexandrov is the sole candidate in the competition, I nevertheless wish to draw the attention of the esteemed Scientific Jury to my assessment of his overall scholarly activity in light of these additional indicators, in order to further substantiate my positive evaluation of his candidacy for the academic position of Professor.

(a) Supervision of doctoral candidates – Assoc. Prof. Andrey Alexandrov, PhD, has supervised and continues to supervise a total of eleven doctoral candidates, two of whom have already successfully defended their dissertations – Rumen Antonov and Paola Klassa.

(b) Participation in scientific juries – Assoc. Prof. Andrey Alexandrov has served on ten scientific juries for the award of the educational and scientific degree "Doctor", one scientific jury for the award of the scientific degree "Doctor of Sciences", and nine scientific juries for appointments to the academic positions of Assistant Professor, Associate Professor, and Professor (a total of twenty participations in scientific juries).

(c) Membership in professional organizations and expert committees – Assoc. Prof. Andrey Alexandrov is a member of the Management Board of the Bulgarian Association of Labour Law and Social Security (BALLSS) and serves as its Scientific Secretary.

In 2020, Assoc. Prof. Andrey Alexandrov served as a member of the Temporary Scientific and Expert Committee of the National Science Fund in a competition

for funding research addressing societal challenges related to the COVID-19 pandemic, as well as a member of the Temporary Scientific and Expert Committee of the National Science Fund in the field of Social Sciences.

During the period 2021–2022, he was a member of various expert committees of the National Evaluation and Accreditation Agency.

(d) Participation in scientific conferences – During the period 2016–2025, Assoc. Prof. Andrey Alexandrov participated with scholarly papers in twenty-five scientific conferences, including four international and twenty-one national scientific conferences.

(e) Membership in editorial boards – Assoc. Prof. Andrey Alexandrov is a member of the Editorial Board of the journal Legal Thought (Pravna Misal) and a member of the Editorial Council of the journal Labour and Law (Trud i Pravo).

(f) Participation in organizing committees of scientific forums and scientific editorial boards – Assoc. Prof. Andrey Alexandrov served as Secretary of the Organizing Committee of the scientific forum "The ILO and Bulgaria – 100 Years and Beyond" and has participated as a member of the scientific editorial board of five conference proceedings volumes.

(g) Reviews of monographs and collected volumes – During the relevant period, Assoc. Prof. Andrey Alexandrov prepared seven scholarly book reviews.

4. Assessment of the Scientific and Applied Scientific Contributions

In my opinion, Assoc. Prof. Andrey Alexandrov, PhD, has made numerous and significant scientific and applied scientific contributions in the field of labour law and social security law. These contributions possess both academic value and practical relevance.

4.1. Assessment of the Scientific and Applied Scientific Contributions of the Habilitation Monograph "Problems of Employment Relations under a Declared State of Emergency or Declared Epidemic Emergency Situation"

The habilitation work submitted by the candidate is a monograph comprising 195 pages, structured into an introduction, three chapters, and a conclusion entitled "Conclusions and Recommendations." It is the first, and to the best of my knowledge the only, attempt at the monographic level to take stock of and assess the advantages and shortcomings of Bulgarian anti-crisis legislation adopted during the COVID-19 pandemic. This in itself constitutes a contribution to legal scholarship.

The first chapter examines the new sources of labour rights and obligations introduced with the aim of mitigating the negative labour-law consequences of the pandemic. It also contains a comparative legal analysis of the legislation of other countries.

The second chapter is devoted to the institutions of Bulgarian labour law affected by the legislative amendments related to the state of emergency and the epidemic emergency situation. Here, the author analyses the principal practical issues arising from the introduction of remote forms of work, part-time work arrangements, overtime work, the use of paid and unpaid leave, the payment of remuneration, the suspension of employers' activities, and other related matters. The relevant legal provisions are subjected to critical analysis, and a number of de lege ferenda proposals are advanced with a view to their refinement and improvement.

The third chapter is dedicated to what Assoc. Prof. Andrey Alexandrov refers to as the "changes that never happened" in Bulgarian labour legislation. In this part, he addresses a number of important issues for which either no explicit legal regulation exists or the existing regulation lacks sufficient clarity and certainty. It is to the author's credit that he does not shy away from discussing controversial, sensitive, and, to some extent, politically charged issues on which neither

legislation nor practice has succeeded in providing definitive answers. Such issues include, for example, who should bear the costs of PCR and antigen tests for employees, whether employers may introduce financial incentives for vaccinated employees, and questions relating to the processing of data concerning individuals' vaccination status (so-called "sensitive personal data"), among others. Although I do not share some of the positions expressed by the author, I consider the discussion of these issues to constitute a contribution to legal scholarship.

In the conclusion, the author sets out the findings he has reached and the de lege ferenda recommendations he proposes. It is precisely these recommendations that constitute the principal scientific contributions of Assoc. Prof. Andrey Alexandrov's habilitation work.

4.2. Assessment of the Scientific and Applied Scientific Contributions of the Studies, Articles, and Chapters in Collective Monographs Submitted for the Competition

What is particularly striking about the submitted scholarly publications is the exceptionally broad range of topics they cover. Without exaggeration, it may be said that there is hardly any significant issue in the field of labour law on which Assoc. Prof. Andrey Alexandrov has not written.

Andrey Alexandrov has authored numerous publications on both traditional labour-law topics—such as working time, rest periods and leave, disciplinary and pecuniary liability, remuneration, termination of employment relationships, judicial protection of labour rights, and others—and on relatively new and less extensively explored subjects within labour-law scholarship that nevertheless possess considerable contemporary relevance and practical significance. These include personal data protection, protection against discrimination of persons with disabilities, protection against workplace harassment, the digitalization of employment documentation and the legal effects of electronic declarations by

the parties to an employment relationship, the legal and ethical limits of employer monitoring through technical means, mediation in labour disputes, and other related issues.

Particular attention should be paid to Assoc. Prof. Andrey Alexandrov's publications on the highly important and pressing issue of the quality of labour legislation. These works are not confined to narrow labour-law problems but rather address fundamental questions of substantial public significance. For example, Assoc. Prof. Andrey Alexandrov has repeatedly drawn attention to the fact that the adoption of numerous separate labour laws constitutes an unjustified departure from a long-standing tradition of labour-law codification that has demonstrated its advantages over decades. The issue, however, is not merely theoretical; it has serious practical implications. Such legislative developments may lead to the establishment of "parallel" and, at times, mutually contradictory legal regimes governing the same legal relationships. Moreover, these are legislative acts of equal legal force, in relation to which it is not always easy to determine whether a later statute supersedes an earlier one or whether the relationship between a general and a special law should apply. The broader the scope for divergent interpretations, the greater the likelihood of inconsistent judicial and administrative practice. Ultimately, this negatively affects both employees and employers by undermining legal certainty. The criticism directed by Assoc. Prof. Andrey Alexandrov at deficient legislative solutions is not an end in itself but rather constructive in nature, as he consistently accompanies his critique with de lege ferenda proposals aimed at improving the legal framework. This constitutes his principal contribution to labour-law scholarship. This contribution could also have a practical dimension, provided that the legislator is willing to "hear" it. Unfortunately, however, in Bulgaria the legislator rarely takes into account the views expressed in legal scholarship, and the relationship between legislation and legal science remains largely one-directional.

In the field of social security law, Assoc. Prof. Andrey Alexandrov has produced fewer publications, yet these also possess considerable scholarly value and constitute meaningful contributions to legal science. Particularly noteworthy is his study devoted to long-term care for elderly persons as an insured social risk, a concept recognised in other European legal systems. He argues that long-term care should be removed from the scope of social assistance, as its current treatment presupposes that only socially disadvantaged individuals require such care, which is not the case. I fully support the view expressed by Assoc. Prof. Andrey Alexandrov that, despite the inevitable increase in the social insurance burden, the introduction of long-term care as a new insured social risk within the Bulgarian social security system deserves serious consideration.

Another of Assoc. Prof. Andrey Alexandrov's studies in the field of social security law provides a general overview of the Bulgarian pension insurance model, the different types of pensions, and the situations in which the social insurance system proves incapable of meeting the needs of elderly persons, thereby necessitating the involvement of the social assistance system.

Assoc. Prof. Andrey Alexandrov has also repeatedly addressed issues related to the maximum insurable income threshold.

In summary, it may be concluded that the scientific articles and studies submitted by the candidate in this competition make significant contributions both to labour-law and social-security-law scholarship and to legal practice.

Conclusion

In view of the foregoing:

I consider that Assoc. Prof. Andrey Alexandrov, PhD, fully satisfies the requirements of Article 29(1) and Article 29b(1) and (2) of the Academic Staff Development in the Republic of Bulgaria Act (ASDRBA), Article 60(1) of the Regulations for the Implementation of the ASDRBA, and the Rules and Procedures

for the Acquisition of Academic Degrees and Appointment to Academic Positions at the Institute for the State and the Law for appointment to the academic position of Professor.

I confidently give a positive assessment of the candidacy of Assoc. Prof. Andrey Alexandrov, PhD, for appointment to the academic position of Professor.

I recommend that the members of the Scientific Jury propose to the Scientific Council of the Institute for the State and the Law at the Bulgarian Academy of Sciences that Assoc. Prof. Andrey Sashov Alexandrov, PhD, be elected to the academic position of Professor in professional field 3.6 Law, scientific specialty 05.05.10 Labour Law and Social Security.

29 June 2026 .....

Sofia Assoc. Prof. Rayna Koycheva, PhD