

CERHA HEMPEL

LEGAL ALERT

Bulgaria



New guidance on the price reporting obligations under the Euro Introduction Act

Following our client alert on the amended Euro Introduction Act and its new obligations for businesses ([read here](#)), this update provides further guidance in light of the Consumer Protection Commission's ("CPC") newly published Guidelines on the application of Article 55b of the Euro Introduction Act (the "**Guidelines**"), addressing the daily reporting obligations of large retailers and the submission of consumer price data.

Daily price reporting obligation for large retailers

Obligated entities: Large retailers (with an annual turnover exceeding BGN 10 million), who sell certain products included in the 'large consumer basket', as defined by the CPC, are required to submit data on the individual selling prices of these products. Currently, the large consumer basket consists of 101 essential goods, defined by the CPC. The CPC may further expand or amend this list.

Obligation period: From 8 August 2025 to 8 August 2026 (the "**Dual Display Period**")

Reporting deadlines: Pricing data for products in the large consumer basket must be published on the retailer's own website and submitted to the CPC portal daily, by 7:00 a.m., including

weekends and public holidays. A final submission deadline is set at 12:00 p.m., after which no updates are permitted. Failure to meet the deadlines may constitute a violation of the Euro Introduction Act and result in penalties.

Data format: Pricing data must be submitted in CSV (Comma Separated Values) format.

Submission method: Via a dedicated interface (API). The authentication requires a unique code (API token) supplied by the CPC. The Guidelines provide instructions for working with the API.

Additional requirements for price reporting

According to the Guidelines, pricing data must be submitted separately for each store location of the retailer, even if prices are identical across different locations. The pricing data for all locations of the retailer must be consolidated into a single daily CSV file, with only one submission allowed per day. Prices must reflect the final customer price, inclusive of all taxes, with any promotional prices reflecting the actual daily discount. Prices must be reported in Bulgarian leva (BGN) until 31 December 2025, and in euros (EUR) from 1 January 2026, applying the official conversion rate.

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Separate obligation to publish detailed price lists for large retailers

In addition to the daily price reporting obligation, the Euro Introduction Act (as interpreted by the CPC Guidelines) introduces a separate requirement for large retailers of food, alcoholic and non-alcoholic beverages, tobacco products, non-food goods, and pharmaceutical products (essentially, all large retailers are in scope). These retailers are required to publish detailed price lists on their websites throughout the Dual Display Period.

The price lists must include information on the specific store location, product name and brand, net quantity, retail price, product category, and where applicable, information on price reductions (reference price, reduced price, duration of reduction, and percentage change).

Currently, there is uncertainty regarding the scope of this requirement, as the CPC has issued conflicting statements on whether this requirement applies to all products offered by large retailers or only to those included in the large consumer basket. CPC is expected to issue further guidance in this regard.

Sanctions

According to the Euro Introduction Act, non-compliance with both the daily price reporting obligation and the obligation to publish detailed price lists may result in fines up to BGN 100,000, and in case of a repeated violation – up to BGN 200,000.

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