

Review

by Prof. Dr. Mariana Atanasova Asenova, with scientific specialty: 3.9. Tourism

Subject: dissertation for awarding the educational and scientific degree "Doctor",
Professional field: 3.9. Tourism

Basis for submitting the review: Order No. 218 of 20.11.2025 of the Rector of the
International Business School on determining the composition of the scientific jury for
an open procedure for public defense

Author of the dissertation: Vanya Georgieva Manikateva

Topic of the dissertation: Tourism policy and regulations for sustainable development

I. Information about the candidate

Doctoral student Vanya Manikateva completed her secondary education at the Language School "Acad. L. Stoyanov" in Blagoevgrad and is fluent in English and German. At the South-West University "Neofit Rilski" she successively acquired a bachelor's degree in tourism (2011-2015) and a master's degree in international tourism (2015-2017). She has a short experience in the field of tourism, realized as an administrator at the "Dyuni" holiday village, and her professional development is as an administrator and expert in a number of organizations and institutions, including in municipal administration. Her most recent positions held are as a director and manager in companies dealing with real estate and trade.

Since 2018, Ms. Manikateva has been a doctoral student at the International Business School.

II. General characteristics of the dissertation work

The dissertation work submitted for review is 267 pages long and consists of an Introduction, 5 main chapters, Conclusion, Sources used and Appendices. The structure corresponds to the given algorithm in the form of sequential implementation of specific tasks to achieve the goal.

The Introduction justifies the relevance of the topic, briefly presents the methodological foundations of the study - the goal and tasks are formulated, the object and subject of the study are correctly defined, and a working hypothesis is presented. It is indicated that the theoretical framework of the study is based on the principles of sustainable tourism and the tourism policies and instruments applied for its development.

The first chapter of the dissertation work is dedicated to outlining the theoretical framework of the study, examining and clarifying the main concepts used in conducting

the study - tourism, environment, development and growth, sustainable tourism development, tourism policy.

The second chapter reveals the various impacts of tourism on the environment. Its impacts in the 4 aspects of sustainability are sequentially examined, highlighting the positive and negative environmental, socio-cultural, economic and political-institutional impacts. Only at the end of this chapter is the methodology of the specific study presented, defining its territorial and substantive scope, indicating the methods and sources of information used, and commenting on some limitations of the study - the lack of sufficient and adequate secondary information and statistical sources for a sufficiently long period of time and the reluctance of some representatives of the tourism industry and its management to participate in the empirical study.

The third chapter presents the tourism policy and contemporary regulations of tourism in the EU, both at the level of the European Union as a whole and at the level of individual national states from the EU (Austria, Germany, Greece, Spain, Italy, Cyprus, Malta, Portugal, Hungary, France, Croatia) and outside the EU, developing tourism similar to Bulgarian (Turkey, Switzerland). The summary text regarding the tourism policy of the listed countries is only one page and is not specifically categorized, commenting mainly on the structure of governance, the existence of special laws and strategies for tourism development, and an attempt is made to highlight the main problems that are addressed in the documents under consideration.

The fourth chapter is dedicated to tourism management and tourism policies for sustainable tourism in Bulgaria. An organizational structure of Bulgarian tourism is presented. The main regulatory and strategic documents are reviewed, without a particularly in-depth analysis and critical assessment. Statistical information is also used to reveal the current state of the sector. A special place is given to the Ministry of Tourism, which implements the tourism policy - its institutional goals and mission, actions and results are outlined.

The fifth chapter represents the contribution part of the dissertation work, as it sets out the author's views on further directions for the tourism policy for sustainable tourism of the Republic of Bulgaria based on a modest empirical study and the review of secondary sources of information carried out in the previous chapters. An essential point in this chapter is the developed roadmap (sequence and model) for the application of the policy for sustainable tourism development in Bulgaria.

The Conclusion summarizes the results of the research conducted, consistently presenting the implementation of the tasks set. Several main political priorities are proposed and it is concluded that the hypothesis formulated at the beginning of the work has been proven.

The bibliographic reference includes a total of 191 sources, of which 78 are in Bulgarian and 113 are in a foreign language. The sources from the Internet are not grouped separately, which makes it difficult to assess the literary sources.

III. Evaluation of the obtained scientific and scientific-applied results

The main scientific and scientific-applied results are reduced to:

- Practical recommendations are proposed in the development and implementation of strategies for the management of sustainable tourism development;
- A roadmap (model) for the implementation of the policy for sustainable tourism development in Bulgaria is proposed, including priority recommended actions (Table 10) with the corresponding argumentation (Table 12)
- A time horizon and budget for actions for sustainable development of the tourism sector in Bulgaria with high priority are proposed (Table 11).

IV. Evaluation of the obtained scientific and scientific-applied contributions

The obtained scientific and scientific-applied contributions are:

- A comparison of the general tourism policy of 13 selected countries is made, with the contribution part being presented in Table 9. Guidelines for action in the tourism policies of selected countries;
- An independent study was carried out to collect primary information related to the knowledge of the problems in tourism in Bulgaria and the measures for their resolution;
- Based on the analysis of the trends in the tourism policies of the selected countries, the state of the regulatory framework for tourism in the Republic of Bulgaria and the results of the survey, proposals were made and guidelines were formulated for the updating and development of the tourism policy concerning the sustainable development of tourism in the country. 19 guidelines and measures were defined, for which a time and constructive model for implementation was prepared. Criteria for their prioritization were also derived.

V. Evaluation of the publications on the dissertation work

4 publications are presented on the topic of the dissertation. Two of them are in publications included in the National Reference List (NRL). The publication titled: "How and whether the strategy for sustainable tourism development in Bulgaria will lead to sustainable tourism development in Bulgaria?" is 21 pages long and for it doctoral student Manikateva can be awarded 15 points. The second article in a publication in the NRL is in press and for it she will be awarded a minimum of 10 points. One of the publications is abroad, but the provided access link is not active. It is evident from the text that the text is not formatted as a scientific publication, and there is no bibliography. The fourth publication, which is stated to be indexed in the Scopus database, is not found there, and is also missing from the NRL. If it is indexed in Scopus, its contribution will be 30 points.

It can be assumed that a sufficient number of scientific publications have been prepared on the topic of the dissertation, but it is important to achieve compliance with the requirements for registration in NACID (minimum 30 points from the group of indicators D).

VI. Evaluation of the abstract

The prepared abstract is 50 pages long and contains the necessary requisites. The text correctly reflects the content of the dissertation work, presenting the main statements, the achieved results and conclusions. From the scientific contributions made, I accept that the main directions of tourism policy in selected 13 European countries have been revealed, as well as that a roadmap (structured target model) for the implementation of tourism policy in Bulgaria has been developed and proposed. The latter contribution is also of a practical nature.

VII. Critical notes, recommendations and questions

Critical notes:

The listed critical notes follow the course of the narrative:

- A version of the dissertation work was presented to the attention of the scientific jury, which is a draft for preliminary discussion, and the open procedure is for public defense.
- On page 9, when formulating the main goal, it is stated that “tourism policies for sustainable tourism development on a global and national scale” will be “analyzed”, while the tasks only refer to the European and national levels.
- For greater correctness, it should be specified that the state tourism authority is not the Ministry of Tourism, but the Minister, with the Ministry being its auxiliary administration (p. 52, p. 148, etc.).
- Quite old publications are used to define the main concepts. For example, for the concept of “environment” – the most recent publication is from 30 years ago (1996). The meaning of the term “regulations”, which is also present in the title, is not clarified; definitions of sustainability are given in quotation marks without the names of the authors.
- When talking about sustainability in tourism and related policies, it should be clarified that there is a significant difference between sustainability at the corporate level and sustainability at the destination level. It is no coincidence that the monitoring of sustainability is carried out according to different indicators (although the groups of criteria may be the same) and with different tools.
- The part on tourism policy (p. I.4. Policy and Tourism Policy) is developed on the basis of a limited number of secondary sources, and not everywhere the reference is clearly indicated.
- The ecological aspect of sustainability (p. II, .6.4.) is mistakenly identified with ecotourism. In practice, the ecological aspect is not considered, but the concepts of ecotourism are presented.

- There is a certain imbalance in the structure of the study - illogically the methodological framework is clarified only after the 90th page. The methodology is usually considered after clarifying the theoretical foundations of the study. Certainly, in this part the goal and objectives should be indicated (and not only in the introduction, where they are presented in a synthesized form), the methods should be presented in more depth, which should be linked to the objectives of the study. For example, a comparative analysis of the policies for sustainable tourism development of selected countries is planned, but it is not explained by which indicators the comparison will be made and why. This reflects on the results of the comparative analysis, which could be presented in a much more structured form. In addition, it is found that a comparison is made of policies in general, and not specifically of those for achieving sustainable development, without explaining the reasons for this.
- A single document was used for the comparative study, namely the OECD 2024 report on tourism trends and policies, in which each country is presented on 4 pages. This report generally refers to the tourism policy of the countries and sustainability is present to the extent that it is part of modern trends. Some important aspects of national policies were omitted in the translation and presentation - for example, for Austria, the eco-label was omitted as one of the important instruments, regarding the financing policy it is not pointed out that enterprises are supported to meet the criteria of the EU Corporate Sustainability Reporting Directive (CSRD) and in particular non-financial reporting on the environmental, social and governance aspects of the activity, etc.
- Regarding the own research, it is repeatedly stated that it is an interview, but in practice it is a questionnaire survey, which was carried out online, making it impossible to ask clarifying questions. In addition, in various places in the text it is described as structured (p. 91) or semi-structured (ibid., but after 4 lines, etc.).
- When presenting the organization and management of tourism in Bulgaria, the organizational chart attached on p. 147 is from the OECD report mentioned above. An error was made in the translation, as local authorities were referred to both the regional and local levels.
- Since May 2025, the national tourist portal has the address visitbulgaria.com, not bulgariatravel.org (p. 150).
- With changes to the Regional Development Act, the development of regional (district) strategies mentioned on page 150 is no longer required, and with the decentralization of the sector through the changes to the Tourism Act, local authorities are charged with more than the listed functions; there are also new requirements regarding the inclusion of tourism programs in municipal development plans.
- Fig. 16 (p. 167) presents the tourism balance of payments (million BGN, NSI, 2024). In fact, data on the balance of payments are provided by the BNB and only for international tourism, i.e. it is not clear what exactly is reflected in the graph based on NSI data.

- In item IV.2.1. Demand for tourist services, specific data for 2022 and 2023 (p. 168), for 2021 (p. 169) are included and commented on, without mentioning the source of the information.
- Tab. 4 (p. 169) is entitled "Registrations of tourists in accommodation establishments with 10 or more beds". The NSI does not use the term "registrations", but "nights spent" or "arrivals". The term "registrations" is also used elsewhere in the text (e.g., on p. 168).
- On p. 177 the establishment of a Guarantee Fund for the protection of consumers in cases of force majeure is reported, but the amendments to the Tourism Act that would lead to its introduction have not yet been adopted by the National Assembly.
- The National Strategy and Action Plan for the Development of Ecotourism, commented on page 179, were developed in the period 2002-2004, but these documents were never officially adopted. At the same time, it is incorrect to state with regard to two other strategic documents – "Strategy for the Development of Bulgarian Tourism for 2006-2009" and "Strategic Plan for the Development of Cultural Tourism" that they have no subsequent development and only a small number of their prescriptions have been taken into account. The first of the mentioned documents contains the guidelines for the preparation of the first Bulgarian National Strategy for Sustainable Development of Tourism in the Republic of Bulgaria (2009-2013). The strategy in question justifies the creation and implementation of a Medium-Term Framework Investment Program and specific 10 projects to it of the State Agency for Tourism under Priority Axis 3 "Sustainable Development of Tourism", operation 3.3 "National Tourism Marketing", under the Scheme for the Provision of Grant Aid BG161PO001/3.3-01/2008: "Support for Effective National Marketing of the Tourism Product and Improvement of Information Services" to the Operational Program "Regional Development" (2007-2013). One of the implemented projects (mentioned on page 185) is related to the development of systems for certification of the quality and sustainable operation of tourism enterprises. Together with the second document, they are used to justify projects under operation 3.2: "Development of the regional tourism product and marketing of destinations", under the Scheme for providing grant aid BG161PO001/3.2-02/2011 "Support for the development of the regional tourism product and marketing of destinations", under which over 40 projects have been implemented in the country for the development of a regional tourism product.
- The own study is quite limited in scale, with an extremely small number of respondents (12), which makes the results unrepresentative and very likely misleading. As mentioned, it is conducted in the form of questionnaire survey (and not an interview), and there is no generalized profile of the respondents. There is a discrepancy between the previously identified target group - management personnel and higher-ranking executive staff, as well as former regular and acting ministers of tourism, directors of institutes and associations, prominent businessmen, professors, etc., and the definition of those not taking part in the study as "officials" who are not interested in tourism problems (p. 200). The questions are complex, with many sub-

questions, which makes it difficult to focus on a specific problem in the answers and, accordingly, in the analysis. The questions relate to general tourism problems and measures to overcome them, and do not concentrate on the problems and policies for sustainable development, which leads to a deviation from the topic of the dissertation.

- The analysis of the results is superficial, rather the proportion of responses is presented, rather than the substantive aspect and additional comments are emphasized. When summarizing the results, conclusions are drawn regarding questions that were not asked: knowledge of the existing regulatory framework, trends in global tourism. Conclusion 4 arises from the way the study was conducted – if the participants had been interviewed, they would have been more verbose and explanatory. Conclusion 6 is also controversial – the problem is not in the lack of information, but rather in the way the questions were formulated.
- In section V.2. Guidelines and recommendations, an attempt is made to outline possible solutions to the problems of Bulgarian tourism. The main shortcomings of this part of the dissertation work are reduced to:
 - ✓ There is no SWOT analysis that would reveal the weaknesses, respectively the problems, as well as the opportunities in order to derive the measures for their resolution;
 - ✓ It is not clear to whom these recommendations are addressed – the Ministry of Tourism, the Council of Ministers, local authorities, especially since they use different instruments of influence for the purpose of tourism development?
 - ✓ The guidelines are not well structured, due to poor systematization of the known instruments of tourism policy and insufficient knowledge of the system of strategic and planning documents, of which tourism is also a part (For example, the National Recovery and Resilience Plan, which provides measures for: 1) financing for energy renovation of non-residential buildings, including public buildings and buildings in the field of production, trade and services, as well as buildings in the tourism sector, with a total planned resource of BGN 617.7 million; 2) use of geothermal energy, incl. for balneology and spa tourism; 3) "green mobility", incl. in support of the tourism sector, etc.);
 - ✓ The National Strategy for Sustainable Tourism Development (2017–2030) is not part of a legal framework (p. 211), but a strategic document;
 - ✓ The monitoring indicators of the National Strategy for Sustainable Tourism Development (2017–2030) are entirely borrowed from the European System of Indicators for Sustainable Tourism Development at the destination level (it can be commented on how justified it is), and this system has also been pilot tested in Bulgaria – twice in the Danube Region with the support of the Ministry of Tourism, in the Sofia Municipality and in the Burgas Tourist Region.

- ✓ The Regional Scheme and the Tourist Region Management Organizations were created for marketing purposes. Under the current Tourism Act, they do not have assigned functions to play a key role in the management and monitoring of sustainable development.
- ✓ Some of the guidelines are very similar in content and can be consolidated – e.g. guidelines 4 and 7 (system of indicators for monitoring and monitoring of social impacts), the guidelines related to capacity, awareness, etc.

Questions:

1. Is there a connection in terms of policies for sustainable tourism development between the global level (UN), the European and the national level?
2. On the basis of what data is the territorial distribution of tourism types in Bulgaria presented in Fig. 20 (p. 174)?
3. Do you know if attempts have been made to establish a National Tourism Organization?

VIII. Summary conclusion

The presented dissertation is distinguished by a very good style, easy to read and understand, without grammatical, spelling and punctuation errors. The dissertation shows that the candidate has significant theoretical knowledge in the specialty and abilities for independent scientific research.

At the same time, some weaknesses are also found in terms of the poorly structured presentation of the derived guidelines and recommendations for improving tourism policy for sustainable tourism development, which is due to the insufficiently in-depth knowledge of the instruments of tourism policy at different territorial levels (although they are listed in the text). The topic is developed in the context of a very narrow understanding of tourism policy, which is reduced only to the activities of the Ministry of Tourism. In fact, the development of tourism is much more dependent on the factors of the economic, social and political environment that are outside the tourism industry itself, respectively. from the general economic, fiscal, external, transport, environmental, cultural, territorial-organizational, etc. policy of the country and the relevant normative, strategic and planning documents. The weaknesses can also include the limited scale of the own research and, in places, incorrect citation.

With some reservations, due to the indicated weaknesses and critical remarks, I propose to the esteemed members of the scientific jury to take a positive decision FOR awarding the educational and scientific degree "doctor" to Vanya Georgieva Manikateva, in the professional field 3.9. Tourism.

Date: 05.01.2026

Signature:

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