



Bulgarian Member of the CEDR (Requested June 2019)

Bulgarian contribution to the CEDR conference Poznan (Poland) September 2019

QUESTIONNAIRE III

1. What are the main developments in rural law since the last Congress? Please consider international, European Union, state and regional measures. If possible, include one or more of the following five topics, which provide a framework for discussion, but reporters should feel free to raise other important developments.

1.1. Regulation and use of new technologies. Although the majority of EU Member States have opted not to allow cultivation of GMOs, GM products, properly labeled, are authorized for food and feed. Current discussions focus on the regulation (or not) of gene editing and other technologies. The new Novel Food regulation applies from 1 January 2018 and amends the authorization process for novel foods. In addition, producers are using techniques of smart farming (such as drones, GPS, etc.). All this contributes to the digitisation of rural life, which in turn contributes to the competitiveness of European agricultural production. What are the relevant national and European rules regarding these developments?

1.2. Regulation of livestock and livestock health. Livestock production is an important agricultural sector in the EU and other nations. Use of antibiotics for livestock growth affects public health and triggers resistance of bacteria to important antibiotics. The EU Animal Breeding Regulation (EU 2016/1012) and implementing measures will apply as of 1 November 2018, and a new Animal Health Law (EU 2016/429) will apply in 2021.

1.3. Food production and labelling. Organic production is significant in some Member States and other countries. Rules for organic production may be amended; the EU Parliament approved new rules in a measure that would apply from 1 January 2021, assuming approval also by the Council of Ministers. The use of meat and dairy terms for plant-based foods (e.g., “almond milk”) is increasingly controversial. In 2017, the European Court of Justice held that the terms milk and dairy are reserved for animal or milk products (Case C 422/16), and at least one Member State has enacted legislation.

1.4. Chemicals in agriculture. As of 27 April 2018, EU Member States restricted the use of certain neonicotinoids to applications in greenhouses across the EU; almost all outdoor uses are banned. Two neonicotinoids can still be used: acetamiprid has been re-approved for use until 2033 and thiacloprid is under review. The ban is a major extension of existing restrictions, in place since 2013. As a result of incidents involving Fipronil (an insecticide) in several EU Member States, the European Commission is considering how to establish a “food safety officer” in each Member State so that relevant information flows as fast and as efficiently as possible to ensure rapid common risk assessment when unsafe food situations emerge.

1.5. Agriculture and the environment. Farming relies on a healthy environment, but farm practices may also pollute water and air and degrade soil resources. National legislation, like some EU policies, is designed to protect the environment and to support producers’ efforts to farm sustainably and to provide ecosystem services. National legislation may ensure that productive farmland remains in agricultural use. Other measures govern the use of harmful pesticides and herbicides on farmland. Climate change poses a threat to agriculture, as well as other sectors. Livestock production (generating methane) contributes to climate change, and some agricultural measures (e.g., sequestration of carbon) may help to mitigate the effects of climate change. Please focus on national measures.

1. What are the main developments in rural law since the last Congress? Please consider international, European Union, state and regional measures. If possible, include one or more of the following five topics, which provide a framework for discussion, but reporters should feel free to raise other important developments.

Topic One: Agricultural Land in General

The share of arable land in Bulgaria decreases as a percentage of the total land fund from 87% in 2007 to 72% in 2016. The share of permanent pasture grows from 9.2% to 25.7% of the land fund. The share of utilized agricultural area (UAA) occupied by the main agricultural land (arable land, permanent pastures and land under permanent crops), according to farm structure survey data, decreases from 3.0% to 2.2%.

- deepening of consolidation in agricultural land in relation to Art. 4a of the ALOUA;

- changes related to the administration of lands representing pastures from the State Land Fund - non-market measures aimed at increasing the utilization density of agricultural lands - § 15 of the Amendment and Supplement Act to the ALOUA. It is important to note that these changes have been

made despite the data on the constantly decreasing "density" of livestock. (See Eurostat data provided for the country since 2013 until the present);

- a possible imbalance between private and public interest - through the possibility of expropriation of agricultural land after the amendments to the State Property Act on expropriation of agricultural land, and analysis in view of the lack of balance between the protection of public and private interest. State institutions - the President institution reports that the amendments to the law are only for the benefit of large farmers and large companies for the acquisition and management of property over agricultural land;

- a possibility to produce and utilize products for scientific experiments and scientific purposes under the GMO-related legislation – it is early to take account of the effect - the changes date from May 2019.

A question arises - whose interests do these changes protect in terms of agricultural land management?

New measures for pastures - new requirements for **animal density**

- they should have a fence ensuring the safety of the site and not allowing free passage of people and other animals;
- they should have an area of at least two decares per animal;
- animals should have permanent access to water and food;
- there should be a shelter with at least two adjacent walls which provides protection against adverse weather conditions and other harmful effects on the animals' health;
- there should be a separate site or facility allowing the animals to be quickly caught and locked in the course of veterinary or zootechnical manipulations;
- there should be an information plate at the entrance containing the site identification data.

The question arises about the extent to which these measures are accomplishable for the owners. In the cases where the land is owned by the State Land Fund or the Municipality - is it possible, if the "site" does not meet these requirements - the agricultural land to become arable land. How will this affect livestock farming, especially small farms?

Topic Two: Introducing restrictions on small farms - after introducing the term "family farm". Through amendments to *Ordinance № 44 on veterinary requirements to livestock sites*.

Reducing the number of animals bred in the yard for personal needs

- not more than 15 adult pigs and their offspring but not more than 200 pigs.
- not more than 10 animals with the offspring up to 12 months old – for sheep and goats, but not more than 30 in total.
- not more than three animals - buffaloes and cows and their offspring up to two years of age but not more than 9 animals in total.

Biosafety

- the "white area" at the entrance of each building should have a filter for changing working clothes;
- should be equipped with a bathtub for washing and disinfecting shoes in cases where they are not changed, as well as with hand disinfection equipment;
- in poultry sites, there should be a room or space provided by the exist where the cleaning, washing and disinfecting of vehicles, with the necessary equipment, shall be carried out;
- incubation and hatching of breeding eggs in one and the same hatchery of the same species of birds only.

Animal welfare and humane attitude to animals

- animals should be permanently supplied with water from own and/or public water source;
- animals should have a fence;
- animals should have places and/or facilities for storing fodder and bedding;
- there should be a separate site for fertilizer storage and decontamination.

The following questions arise - how to define "family needs"? How "reasonable" is the deadline for introducing the new rules?

Topic Three: Bio-economy. Bulgaria provides data on its consumption to Eurostat - Section "Bio-Economy" and "Sustainable Development". The institutional and technological vision on "bio-economy" is at an initial stage of development.

Topic Four: It is considered that due to legislative mechanisms related to environmental protection and green energy production, Bulgaria has drastically reduced its carbon and methane emissions. See data from the Eurostat 2018 Sustainable Development Report.

Source: This part of the research is based on data from the Sustainable Development in the European Union Monitoring Report on Progress Towards The Sdgs in / EU Context 2018 edition (pp. 139- 147).

On the other hand, Bulgaria has changed its legislation regarding the protection of air from pollution with fine dust matter. *See: Decision of the Court of Justice – EU of 5 April 2017 on case C 488/15 through which Bulgaria has been convicted - in respect of actions for failure to fulfil obligations.*

There are no indications of any positive effect on the general health status of society. We believe that the reasons should be sought in factors determining social inequalities.

1.1. Regulation and use of new technologies. Although the majority of EU Member States have opted not to allow cultivation of GMOs, GM products, properly labelled, are authorized for food and feed. Current discussions focus on the regulation (or not) of gene editing and other technologies. The new Novel Food regulation applies from 1 January 2018 and amends the authorization process for novel foods. In addition, producers are using techniques of smart farming (such as drones, GPS, etc.). All this contributes to the digitisation of rural life, which in turn contributes to the competitiveness of European agricultural production. What are the relevant national and European rules regarding these developments?

The basic legal framework of genetically modified organisms (GMOs) in relation to their connection to agriculture in Bulgaria are the *Food Act* and the *Genetically Modified Organisms Act*.

In addition to *Regulation 1829/2003 of the European Parliament and the Council of the European Union* and the related acts, legislation on GMOs to a certain extent aims to implement the *precautionary principle (preliminary precaution measures)* from EU law (see Art. 23b of the *Food Act*).

Bulgaria is one of the EU member states that has opted for a firm vertical approach to regulation, a consequence of which being that the regimes determining GMO activities are highly restrictive. The country has chosen not to produce GMOs on its territory. With the *Ordinance on the use of genetically modified organisms under controlled conditions*, the Ministry of Agriculture, Food and Forestry allowed the production of GMO - seeds for research purposes, selection, demonstration and production experiments in controlled conditions in Bulgaria. Art. 17 (2), para. 11 of that regulatory act states that, according to the requirements for packaging and labelling of seeds, it is mandatory to indicate, if the seeds are GMO.

*Source: Official website of the Ministry of Agriculture, Food and Forestry,
www.mzh.government.bg*

Bulgaria has adopted the new updated aviation safety rules, and in particular the rules of the EU drones regulation (Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency). Bulgaria, however, does not yet have its own specific legal framework on the use of drones in agriculture. The General Directorate "Civil Aviation Administration" at the Ministry of Transport, Information Technology and Communications is developing rules for the registration of drones and "drone drivers".

Currently, the legal framework on drones is determined by:

- Civil Aviation Act;
- Ordinance № 2 of the Ministry of Transport of 10 March 1999 on flight rules.

Procedure:

Must request through a letter to the Directorate General "Civil Aviation Administration" (DG CAA) permission to fly;

Obtain the permission by DG CAA and inform the Air Navigation Service Provider at least 8 calendar days before your flight.

The Ordinance introduces an authorization regime for remote control aircraft operations. In such cases, they shall be carried out only after the written permission of the General Directorate "Civil Aviation Administration" in a reserved airspace.

*Source: Official website of the Ministry of Transport, Information Technology and Communications,
www.caa.bg*

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According to a report of the European Medicines Agency analysing the sale of antibiotics for animals in 30 European countries in 2015, Bulgaria occupies one of the first places of antibiotic use in animals. For 2015 it is the world's eighth. One kilogram of live weight averages 121 milligrams of antibiotic.

EU regulations have a direct effect on Bulgarian legislation. Additional regulations representing measures related to the way of using antibiotics for livestock growth in connection with the implementation of Regulations (EU 2016/1012) and (EU 2016/429) should be found in the *Animal Breeding Act of the Republic of Bulgaria*:

- with regard to the control of the activities related to the breeding, feeding and reproduction of farm animals and the production of animal products intended for sale;
- the registration system for livestock holdings and animals provided for in the Veterinary Medicine Act and representing the identification of animals and the registration of livestock sites.

On the other hand, the *Fodder Act* introduces a highly restrictive regime with regard to the placing on the market and use of antibiotics other than coccidiostats and histomonostats as fodder additives. An exception is made for antibiotics used for scientific experimental purposes, provided that the experiments are conducted in accordance with Art. 3 (2) of Regulation (EC) № 1831/2003.

Bulgaria observes the European legal framework on the use of antibiotics in the treatment of animals:

- 2014/0257(COD) COD - Ordinary legislative procedure (ex-codecision procedure) Regulation and Repealing Directive 2001/82/EC 1999/0180(COD). The direct effect of the regulation underlying the Animal Welfare Act has no specific rules.

Bulgaria has adopted: *National Action Plan against Antimicrobial Resistance; National Program for the Prevention, Supervision, Control and Eradication of Animal Diseases and Zoonoses in Bulgaria 2016 – 2018*, as well as several atypical acts - methodological guides on the fight against some of the animal diseases. For example, *Practical Guide to Combat the Infectious Nodular Dermatitis / Lumpy Skin Disease / Order № RD 11-1576/19.10.2015; Practical Guide to Combat the Bluetongue Disease in Ruminants / Order № RD 11-754/20.07.2019*.

As a part of this plan, the actions of the Ministry of Agriculture, Food and Forestry and the Bulgarian Food Security Agency (BFSA) should be determined regarding the contamination with animal plague in the Strandzha region in 2018. The huge response and the not always positive social effect associated with these actions should also be taken into account.

As a representative of the scientific community, I believe that not all concrete actions resulting from this part of the legislation on the part of the Bulgarian institutions, are proportional (within the meaning of EU law).

Source: Official websites of the Ministry of Agriculture, Food and Forestry and the Bulgarian Food Security Agency, <http://www.mzh.government.bg/bg/>, <http://www.babh.government.bg>

1.3. Food production and labelling. Organic production is significant in some Member States and other countries. Rules for organic production may be amended; the EU Parliament approved new rules in a measure that would apply from 1 January 2021, assuming approval also by the Council of Ministers. The use of meat and dairy terms for plant-based foods (e.g., “almond milk”) is increasingly controversial. In 2017, the European Court of Justice held that the terms milk and dairy are reserved for animal or milk products (Case C 422/16), and at least one Member State has enacted legislation.

Even though the milk produced and processed during the period 2007 to 2015 has declined, over the last three years this trend has been reversed. In 2017, the country produces 578.79 thousand tons, and in 2018 the processed milk amounts to almost 810 thousand tons. 91% of the total amount is cow's milk. Bulgaria produces not more than 20-25% of its needed quantities. Butter production is 2.05 thousand tons in 2007, following a downward trend until 2016 and amounting to 0.87 thousand tons, but in 2017 the production increases to 1.06 thousand tons.

Source: Own analysis based on Eurostat data, <https://ec.europa.eu/eurostat>

As regards milk and dairy products, Bulgaria has adopted rules on the identification of production at all levels by:

- *Food Act;*
- *Decree № 135 of 9 July 2018 amending and supplementing the Ordinance on the specific requirements for dairy products adopted by Decree № 119 of the Council of Ministers of 2012;*
- *Ordinance on the specific requirements for caseins and caseinates intended for human consumption;*

- *Ordinance № 1 on food hygiene of the Ministry of Agriculture, Food and Forestry and the Ministry of Health* which decrees that dairy products can be sold only separately from similar products or their substitutes.

Producers of milk and dairy products and producers who cut and repackage milk and dairy products cannot produce, cut and repackage imitation products containing milk on the same site registered under the Food Act. The new requirements for dairy products and their substitutes produced on the territory of Bulgaria directly affect legal security and should improve governance in agriculture.

Source: Official websites of the Ministry of Agriculture, Food and Forestry and the Ministry of Health, www.mzh.government.bg; www.mh.government.bg

1.4. Chemicals in agriculture. As of 27 April 2018, EU Member States restricted the use of certain neonicotinoids to applications in greenhouses across the EU; almost all outdoor uses are banned. Two neonicotinoids can still be used: acetamiprid has been re-approved for use until 2033 and thiacloprid is under review. The ban is a major extension of existing restrictions, in place since 2013. As a result of incidents involving Fipronil (an insecticide) in several EU Member States, the European Commission is considering how to establish a “food safety officer” in each Member State so that relevant information flows as fast and as efficiently as possible to ensure rapid common risk assessment when unsafe food situations emerge.

Despite the change in European legislation, in Bulgaria the *Ordinance on the methods for implementation of plant protection, disinfection and anti-insect activities* has not been amended yet. In Northern and Northeast Bulgaria there has been mass extinction of bees in 2019. The largest number of dead bee families are registered in the regions of Pleven, Balchik, Varna, Dobrich and Ispirih. In connection with the many dead bee colonies in the country until May 8, 2019, a meeting of the Advisory Board at the Ministry of Agriculture, Food and Forestry was held, and a decision was made to amend *Ordinance № 13 on measures for the protection of bees and bee families from poisoning*.

It has not been established beyond any doubt the spraying with which preparation caused the poisoning. For that reason the Bulgarian Food Safety Agency has committed itself to compensating through individual support by *de minimis* the beekeepers whose bees have died of poisoning.

The scientific circles of the Republic of Bulgaria express hope that in addition to the amendments concerning the use of insecticides, an administrative order will also be provided for in the Ordinance, introducing the figure of a "food safety officer" as well as new possibilities for expanding the subjective protection while observing the principle of effectiveness of EU law.

1.5. Agriculture and the environment. Farming relies on a healthy environment, but farm practices may also pollute water and air and degrade soil resources. National legislation, like some EU policies, is designed to protect the environment and to support producers' efforts to farm sustainably and to provide ecosystem services. National legislation may ensure that productive farmland remains in agricultural use. Other measures govern the use of harmful pesticides and herbicides on farmland. Climate change poses a threat to agriculture, as well as other sectors. Livestock production (generating methane) contributes to climate change, and some agricultural measures (e.g., sequestration of carbon) may help to mitigate the effects of climate change. Please focus on national measures.

Bulgaria has ratified and committed to the United Nations Framework Convention on Climate Change (UNFCCC) - the Kyoto Protocol (Bulgaria is also a part of the Paris Climate Agreement).

As a part of the Bulgarian legal framework, the following acts should be mentioned:

- *Climate Change Act;*
- *Renewable Energy Act;*
- *Amendment and Supplement Act § 13a of the Local Taxes and Fees Act (LTFA) 2015 - a plan-account has been introduced to develop a methodology for differentiated determination of the municipal waste charges and Art. 58 of the LTFA - towards introducing a fiscal policy based on the most environmentally-friendly standards for automobiles - "Euro" - introducing the "polluter pays" and "consumer pays" principles;*
- *The Regional Development Act (in force since 2014) requires municipal development plans to contain measures for limiting climate change and for adapting to the changes that have already occurred (Art. 13, para. 2, item 9);*
- *Forestry Act (FA), Art. 163 on the certification of the implementation of measures related to the protection of the environment.*

Documents:

- *National Climate Change Plan (NCCP);*
- *National Renewable Energy Action Plan until 2020.*

Other:

- *Financial management of risk of disasters and insurance opportunities for adaptation to climate change in Bulgaria;*

- *Analysis and assessment of the risk and vulnerability of the sectors in the Bulgarian economy to climate change;*

- *Specific measures can be found in the established National Green Investment Scheme.*

Measures should be divided into ones with direct and with indirect impact in several areas including: the energy sector, lifestyle and services, industry, transport, agriculture and forestry, land use, science, etc.

According to the first report on the implementation of the NCCP, 87 measures with effects on climate change have been assessed, of which: in sector "Agriculture" - 16, in sector "Land Use, Change in Land Use and Forestry" - 16; in the sphere of Education and Science Focus / Agriculture - 1.

"Energy" Sector - The expected effect of the realization of the Action Plan measures is 2 236 722 tonnes of CO₂ equivalent per year saved emissions. Actually saved emissions are estimated at 8 083 705 tonnes CO₂ equivalent per year, and it is reported that one of the direct effect measures is not implemented.

"Household and Services" Sector - Three of the direct effect measures are not implemented, resulting in the saving of 283 666 tonnes CO₂ equivalent per year from the expected 385 515 tonnes CO₂ equivalent per year.

"Industry" Sector – According to the planned measures in the sector and expected effect of their implementation - 751 841 tonnes CO₂ eq./year are saved 126 604 tonnes CO₂ eq./year. The calculations also took into account that one direct effect measure is not implemented.

"Wastes" Sector – 542 920 tonnes CO₂ eq./year of the estimated 1 489 934 tonnes CO₂ eq./year are saved from the implemented measures in the sector. All included measures in the plan are implemented.

"Agriculture" Sector - the measures planned in the document for the sector are exceeded, and the resulting emission savings are 310 986 tonnes CO₂ eq./year of expected 3 759 tonnes CO₂ eq./year.

"Land Use, Change in Land Use and Forestry" Sector - in this sector also the planned measures are exceeded and 54 663 tonnes CO₂ eq./year are saved from the expected 10 128 tonnes CO₂ eq./year.

"Transport" Sector - According to the measures envisaged for implementation in the sector, it is planned to reduce emissions by 730 459 tonnes CO₂ eq./year. The sector data show that the measures are successfully implemented and the saved emissions amount to 657 982 tonnes CO₂ eq./year.

Measures in the field of education and science.

The total effect of the measures in all sectors, expressed in terms of reduced greenhouse gas emissions, amounts to 10 060 537 tonnes CO₂ eq./year, which is by 4 452 177 tonnes CO₂ eq./year over the expected effect of the implementation of measures (5 608 360 tonnes CO₂ eq./year). Data is awaited on the 2017 and 2018 annual report.

Source: Own research based on data from the official website of the Ministry of the Environment and Waters, www.moew.government.bg

According to Eurostat data, nitrogen emissions in Bulgaria are far from the EU average levels. There is a slight increase in the period 2011-2016 from 0.7 to 0.8 / (kg per ha of utilised agricultural area).

Source: This part of the research is developed on the basis of data from the Sustainable Development in the European Union Monitoring Report on Progress towards the Sdgs in / EU Context 2018 edition (p. 58).

2. As you discuss rural law developments in your country, please address the following questions:

2.1. What are the sources (statutes, administrative regulations, national policy) for each of these developments?

2.2. What are the main elements of each of these developments and how do they affect producers?

2.3. Are these legal developments in your country linked to international, European, national and/or regional obligations or guidelines? Are the developments compatible and in conformity with international, European, national and/or regional obligations or guidelines?

2.4. Do any difficulties in implementation arise?

2. As you discuss rural law developments in your country, please address the following questions:

2.1. What are the sources (statutes, administrative regulations, national policy) for each of these developments?

Bulgaria develops agricultural policy related to rural areas as a part of the second pillar of the EU CAP - *The Rural Development Program* is operational during the period: first 2007-2013, and now

2014-2020. An indicative annual working program for the Rural Development Program for the period 2014-2020 - for 2019 - is in the process of being implemented. In this regard, essential for the Bulgarian legal system are *Regulation 1305/2013* of the European Parliament and the Council; *Regulation 1305/2013* of the European Parliament and the Council – on the Cohesion Fund / rural areas / - for rural development, and the *Farmers' Support Act (FSA)*.

In the FSA sixteen support measures are exhaustively listed - through the ISMMSIEUB (Information System for Management and Monitoring of the Structural Instruments of the EU in Bulgaria) to support agriculture in rural areas, including options for advance payments and interest-free loans.

The specific regulatory framework includes regulations for implementing measures to stimulate rural development as follows:

Ordinance № 9 of 21 March 2015 for the application of sub-measure 4.1 "Investments in agricultural holdings" of Measure 4 "Investments in tangible assets" of the Rural Development Program 2014-2020

Ordinance № 14 of 28.05.2015 for application of sub-measure 6.1 "Start-up support for young farmers" of Measure 6 "Development of farms and enterprises" of the Rural Development Program 2014-2020

Ordinance № 16 of 30.07.2015 for the application of sub-measure 19.1 "Aid for preparatory actions" of Measure 19 "Local community-led development" of the Rural Development Program 2014-2020

Ordinance № 17 of 19.08.2015 for the application of Measure 20 "Technical Support" from the Rural Development Program 2014-2020

Ordinance № 20 of 27 October 2015 on the application of sub-measure 4.2. "Investment in processing/marketing of agricultural products" of Measure 4 "Investments in tangible assets" of the Rural Development Program 2014-2020

Ordinance № 22 of 14 December 2015 for the application of sub-measure 19.2 "Implementation of community-led local development operations" of Measure 19 "Local community-led development" of the Rural Development Program 2014-2020

Ordinance № 1 of 22 January 2016 for the application of sub-measure 19.4 "Running costs and promotion of community-led local development strategy" of Measure 19 "Local community-led development" of the Rural Development Program 2014-2020

Ordinance № 6 of March 28, 2016 for application of sub-measure 7.6. "Surveys and investments related to the maintenance, restoration and improvement of the cultural and natural heritage of villages" of Measure 7 "Basic services and renovation of the villages in rural areas"

Ordinance № 10 of 10.06.2016 for application of sub-measure 6.3. "Starting support for the development of small farms" of Measure 6 "Development of farms and enterprises" of the Rural Development Program 2014-2020

Ordinance № 12 of 25 July 2016 for application of sub-measure 7.2. "Investments in the creation, improvement or expansion of all types of small scale infrastructure" of Measure 7 "Basic services and renovation of the villages in rural areas" of the Rural Development Program 2014-2020

*Source: Own research based on data from the State Fund Agriculture,
<http://www.dfz.bg>*

With an Order of the *Executive Directorate for Rural Development* a committee for monitoring the implementation of the program is approved and established at the Ministry of Agriculture, Food and Forestry, having coordination functions – whose members, besides state representatives, representatives of the Regional Governments and of the Municipalities – also participate representatives of the associations of agricultural producers by sectors, representatives of food processors, representatives of the Bulgarian Chamber of Commerce and Industry, representatives of the banks and leasing companies, other associations and non-government organizations. As early as 2015, the organization develops working criteria and decides that projects in the following areas should be considered of priority for the program:

- projects with investments and activities targeting the fruit and vegetables sector;
- projects with investments and activities aimed at the livestock sector;
- projects with investments and activities focused on the sector of essential oil and medical crops.

The absence of scientific circles during the launch of the campaign is noted.

*Source: Own research based on data from the State Fund Agriculture,
<http://www.dfz.bg>*

2.2. What are the main elements of each of these developments and how do they affect producers?

In Bulgaria, growth was recorded in 2018 in the dairy production and processing sector. Production on the territory of Bulgaria still fails to satisfy demand in the domestic market. In such a situation, measures linked to "animal density" will act rather deterring to market volumes and hence to producers.

The production of vegetables in Bulgaria shows small growth in 2018 which is strongly bound to: (a) the shorter period of intensive technology in the country; (b) water resources, including

groundwater resources; (c) the availability of appropriate spatial layout for relevant technologies - suitable soils; (d) the institutional factors determining imports from neighbouring countries; (e) the cost of energy resources; (f) specific regulations enabling producers to obtain a greater part of the value in the chain. So far, regulations in the country have not made vegetable producers competitive enough.

Regarding the production of lavender, Bulgaria shows growth in 2018. This means that some of the producers who use agricultural land directly for production purposes, have managed to diversify their activities. The examination of the structure of farmers clearly shows that this effect mainly affects high-factor productions, and to a much lesser extent, small farmers.

*Source: Own research based on data from the Agricultural University – Plovdiv, Bulgaria,
<https://www.au-plovdiv.bg/>*

2.3. Are these legal developments in your country linked to international, European, national and/or regional obligations or guidelines? Are the developments compatible and in conformity with international, European, national and/or regional obligations or guidelines?

Bulgaria has undertaken to participate in the European and Territorial Cooperation programs. The current report cannot provide information on Bulgaria's directions and joint developments with third countries.

2.4. Do any difficulties in implementation arise?

Problems related to good governance:

- the non-timely provision of reliable statistical information on the state of the institutional background, the implementation of programs, respectively the fulfilment of obligations on them, does not always allow the problems to be identified effectively (In most cases we have access to information no newer than 2017).
- in most cases, information on certain opportunities reaches farmers hard and after a substantial delay despite the established and functioning governmental and non-governmental support;
- state structures providing information are centralized - few staff positioned primarily in the country's major regional centres.

Problems with the adaptation to agricultural legislation and institutional requirements

- Too many laws and by-law acts;
- Too much documentation;
- Digital formats of electronic services are very often missing. In other cases, they are limited to the possibility of downloading document templates. Where digital formats are built - legal actions are not tailored to all groups of farmers, especially to older people. For example, the State Fund Agriculture webpage <https://seu.dz.bg/drupal>

Malfunctioning of the link business - education - science.

There are problems arising from the way in which domestic markets are regulated - for instance, the energy market - related to the purchase of electricity by small producers who derive it from renewable energy sources. The latter does not stimulate the widespread use of a part of the measures - in the context of sustainable development and circular economy.

Source: This part of the research is based on data from Sustainable Development in the European Union Monitoring Report on Progress towards the Sdgs in / EU Context 2018 edition (pp. 139- 147).