

# The case of Bulgaria

## Funding forests into the future?

How the European Fund for Rural Development affects Europe's forests



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Bulgarian Society for the Protection of Birds/BirdLife Bulgaria



A report produced by FERN, March 2008





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This paper was funded by the European Community, Directorate-General for Agriculture and Rural Development and the Dutch Ministry of Environment and Spatial Planning.

The views expressed, the information presented, and the geographical and geopolitical designations used in this product do not imply the expression of any opinion whatsoever on the part of any of the donors. Neither do they necessarily represent FERN's position.

This paper is part of a series of six country reports that includes Bulgaria, Czech Republic, Finland, Hungary, Portugal and Romania. All are available at [www.fern.org](http://www.fern.org)

*March 2008*

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## Acronyms

BA	Biodiversity Act
BG	Bulgaria(n)
BSPB	Bulgarian Society for the Protection of Birds/ BirdLife Bulgaria
CAP	Common Agricultural Policy
CBD	Convention on Biological Diversity
EAFRD	European Agricultural Fund for Rural Development
EAP	European Action Programme
EC	European Commission
EIA	Environmental Impact Assessment
EU	European Union
FAO	Food and Agriculture Organisation of the United Nations
FAP	Forest Action Plan
FLEG(T)	Forest Law Enforcement, Governance (and Trade)
GVA	Gross Value Added
HNV	High Nature Value
IACS	Integrated Administration and Control System
KM	Key Measure
LAU	Local Administrative Unit
MA	Managing Authority
MAF	Ministry of Agriculture and Forests
MAFS	Ministry of Agriculture and Food Supply <sup>1</sup>
MoEW	Ministry of Environment and Water
NBCS	National Biological Diversity Conservation Strategy
NFB	National Forestry Board
NGO	Non-Governmental Organisation
NPBC	National Plan for Biodiversity Conservation 2005–2010
NSPRD	National Strategy Plan for Rural Development 2007–2013
NUTS	Nomenclature of Territorial Units for Statistics
OECD	Organisation for Economic Co-operation and Development
RD	Rural Development
RDP	Rural Development Programme 2007–2013
RDR	Rural Development Regulation
RES	Renewable Energy Systems
SAF	State Agency for Forestry <sup>2</sup>
SAPARD	Special Accession Programme for Agriculture and Rural Development
SCI	Site of Community Importance
SEA	Strategic Environmental Assessment
SFMP	Sustainable forest Management Plan
SGRD	Strategic Guidelines for Rural Development
SPA	Special Protection Area
SPFSD	Strategic Plan for Forest Sector Development 2007–2011
UNFCCC	United Nations Framework Convention on Climate Change

1 Formerly Ministry of Agriculture and Forests.

2 Formerly National Forestry Board.

# 1 General description of rural development and forestry in Bulgaria

The Republic of Bulgaria's Rural Development Programme (RDP) 2007–2013<sup>3</sup> is due to be implemented over the entire territory of the Republic of Bulgaria.

The whole territory of the Republic of Bulgaria has been classified under the 'convergence' objective. The specific purpose of this objective is to speed up the economic convergence of the least-developed member states and regions by improving conditions for growth and employment; supporting quality investment in physical and human capital; investing in a knowledge-based society; helping societies adapt to economic and social changes; protecting the environment; and promoting administrative efficiency.<sup>4</sup> Axis 1 of the RDP, which aims to increase the competitiveness of the agricultural, forestry and food-processing sectors, is related to the rationale of the convergence objective and has to be in line with it. This applies more generally to the RDP as a whole.

## 1.1 Definition of the rural area

Bulgaria is divided into six planning regions (NUTS2), 28 administrative regions (NUTS3) and 264 municipalities (LAU1). According to the OECD definition, there are twenty predominantly rural NUTS3 regions, seven intermediately rural regions, and only one predominantly urban region – the capital, Sofia. Thus predominantly and intermediately rural regions cover 98.8 per cent of the territory, and 84.3 per cent of the population of Bulgaria live in those regions.

Rural areas are defined as municipalities (LAU1), in which no settlement has a population over 30,000 people. This definition has been used under SAPARD and will also be applied in the RDP 2007–2013 for territorially based interventions. According to this definition, 231 municipalities in Bulgaria are classified as rural. The rural areas represent 81 per cent of the Bulgarian territory, and 42 per cent of the population live there (RDP 2007–2013).

## 1.2 Forestry, forestry land use and ownership structure<sup>5</sup>

The total forest area of Bulgaria is 4.1 million hectares (ha) and comprises up to 34 per cent of the country's territory, but only 3.65 million ha (89.7 per cent) of the 4.1 million ha is actually wooded. The rest, nearly 10 per cent of the whole area, is non-wooded land; this consists of forest roads, nurseries, mountain pastures, rocky areas, rivers, etc. Most of the forests are located in the mountainous (ca 80 per cent of the Bulgarian forests) and semi-mountainous areas (Yonov & Velichkov 2004). The forests of Bulgaria are divided into three groups, according to their main purpose:

1. Wood-producing and environment-sustaining forests (68.1 per cent)
2. Protective and recreational forests (23.7 per cent)
3. Forests and lands in protected areas (8.2 per cent)

Broadleaved forests (mainly oaks and beech) dominate, amounting to 70.4 per cent of the total. Coniferous forests (represented mainly by Scots pine, Austrian pine and Norway spruce) occupy only 29.6 per

3 The present analysis takes into consideration the final (December 2007) version of the RDP. The RDP was agreed by the Rural Development Committee at the end of December 2007. The Commission still has to adopt the programme formally; this will happen in the next few weeks.

4 Source: webpage of the European Parliament Legislative Observatory (procedure file, legislative dossier), <http://www.europarl.europa.eu/oeil/file.jsp?id=5188922> (December 2007).

5 MAF 2006 data is used for the analysis in this section.

cent of the area. Natural forests account for 73.4 per cent of the forested area, while plantations occupy 26.6 per cent (SPFSD 2007–2011).

The average age of Bulgaria's forests is 51 years, but the range is very wide. More than 60 per cent of all forest is younger than 40 years, and this applies particularly to the conifer forests. Young conifers dominate in Bulgaria's non-state forests (RDP 2007–2013). These forests are plantations, which were established 20–40 years ago with a very high stand density. Some 1.5 million ha have been afforested over the last 50 years (Yonov & Velichkov 2004). The percentage of coppiced forests is also very high, accounting for more than 29 per cent of the forested area in Bulgaria.

The Bulgarian forest resource is very valuable environmentally, and can be said to be unique not just in European but also in global terms. Bulgarian forests play an important role in preserving over 60 per cent of the country's priority habitats; over 80 per cent of the protected plant species; and over 60 per cent of the endangered animal species. They are home to populations of 43 of the world's endangered species; and they comprise eight of the twelve landscape complexes which were defined in the national strategy for preservation of biodiversity as unique and representative of Bulgarian biodiversity (SPFSD 2007–2011).

Bulgaria's forests provide about 85 per cent of the water flow in the country; and some 14 per cent of them have been designated as having, as their primary function, a crucial role in the protection of the soil against erosion and the maintenance of water balance (Yonov & Velichkov 2004).

In Bulgaria, forest land ownership has become fragmented since the start of the land restitution process which followed the collapse of Communism. According to MAF 2006 (Chapter 5, Forestry), 78.1 per cent of the total forest territory is currently owned by the state. The remaining 21.9 per cent (890,783 ha) includes:

1. Municipal forests (464,929 ha or 11.4 per cent of total forest cover)
2. Private forests (393,680 ha or 9.7 per cent of total forest cover)
3. Other types of ownership (32,174 ha or 0.8 per cent of total forest cover)

As the restitution process continues, the percentage of non-state forests will increase further. And already the structure of forest ownership varies throughout the country. Private forests are generally small, and predominantly (92.8 per cent) less than 2 ha in size. Because these forests are not just small but are also remote, there is a little interest in managing these forests. More than 30 per cent of private forest owners live in the big cities, far removed from the forests, and therefore have no incentive to perform the costly (but necessary) silvicultural activities in the forests that they own (WWF Bulgaria 2007).

### **1.3 The importance of forestry**

Forests and forestry play an important role in rural Bulgaria in terms of employment, recreation, tourism, water and public purpose activities. There are no official data on the contribution of the forestry sector to GVA and employment. Unofficial estimates assume that the forestry share was about 0.2 per cent of GVA in 2004. According to the FAO, about 34,300 people were employed in the forestry sector in 2000 (RDP 2007–2013).

## 2 The RDP and the National Strategy Plan for Rural Development

The RDP is in line with the National Strategy Plan for Rural Development 2007–2013 (NSPRD), since its main purpose is to apply the National Strategy Plan. The RDP was elaborated taking into account both the priorities set in the Community Strategic Guidelines and the NSPRD.

The EU's Rural Development Policy is based on three main legal instruments: the EU's Strategic Guidelines for Rural Development (SGRD), Council Regulation on support for rural development by the new European Agricultural Fund for Rural Development (EAFRD), and the Commission Implementing Regulation. EU strategic guidelines identify the areas that are important for the realisation of community priorities and a range of options which member states may use in their national strategy plans and RDPs. National strategy plans are translating the guidelines into the national context in the light of identified needs of particular regions; RDPs are implementing the national strategy plans.

The RDP 2007–2013 focuses on three areas, corresponding to the three thematic axes laid down in the new rural development regulation: improving competitiveness for farming and forestry; protecting the environment and countryside; and improving quality of life and diversification of the rural economy. A fourth axis, called the 'Leader Axis' – which is based on experience with the Leader Community Initiatives – introduces possibilities for locally based bottom-up approaches to rural development.<sup>6</sup>

The purpose of the Bulgarian RDP is to apply the NSPRD,<sup>7</sup> the overall objectives of which have been set for the period 2007–2013:

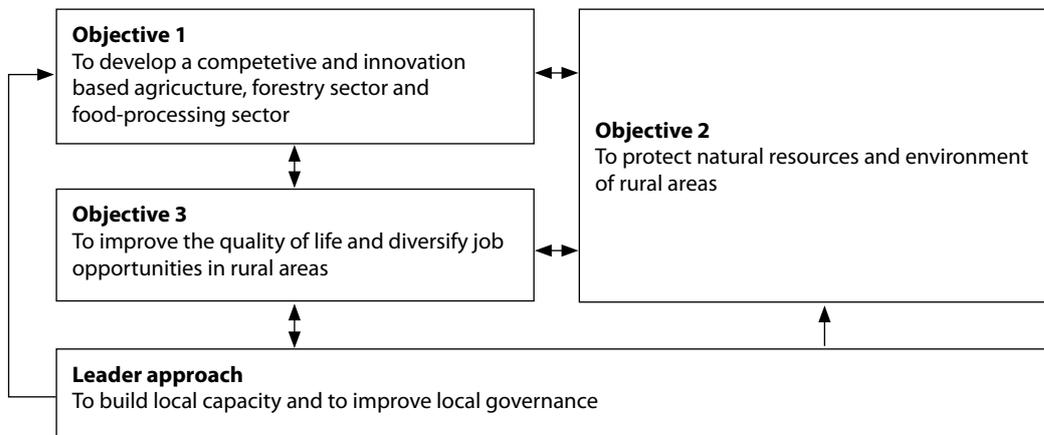
1. To develop a competitive and innovation-based agricultural, forestry and food-processing sector (Axis 1)
2. To protect natural resources and the environment of rural areas (Axis 2)
3. To improve the quality of life and diversify job opportunities in rural areas (Axis 3)
4. To build local capacity and to improve local governance (Leader Axis)

They are based on the SGRD, and on the major EU priorities associated with job creation, growth and sustainability (Lisbon and Göteborg) in compliance with other EU policies concerning cohesion, protection of the environment, and also take into account the socio-economic conditions of rural Bulgaria:

<sup>6</sup> Source: Webpage of DG Agriculture and Rural Development, Rural Development Policy 2007–2013, online at [http://ec.europa.eu/agriculture/rurdev/index\\_en.htm](http://ec.europa.eu/agriculture/rurdev/index_en.htm) (October 2007).

<sup>7</sup> The present analysis has been made taking into consideration the final official version of the National Strategy Plan for Rural Development 2007–2013 as of September 2006.

**Figure 1 – Overall objectives of the Bulgarian National Strategy Rural Development Plan 2007–2013**



Certain subobjectives in the NSPRD are assigned to every overall objective in order to make it more concrete. These objectives are addressed by specific measures of the four axes of the RDP, tackling specific areas of intervention within the context of the strategic objectives.

According to the ex-ante evaluation of the RDP, all the operational objectives and subobjectives are consistent with the strategic objectives. It is important to ensure consistency between the operational level (measures in the RDP) and the specific and overall level (objectives of the NSPRD) in order to achieve the defined objectives and targets. The link between the objectives on the one hand, and the measures on the other, is in general visible and solid and demonstrates a logical interaction and coherence that in the end will contribute to the achievement of the global objectives.

The proposed measures set down in the RDP cover a wide spectrum of impact on the economic, social and natural aspects of rural areas and their functioning. Taking into account the need for restructuring and modernising the Bulgarian agricultural, forestry and food-processing sectors (see the NSPRD objective 'To develop a competitive and innovation-based agriculture, forestry sector and food-processing sector'), 42 per cent of the community contribution under the three axes is allocated to Axis 1. The measures under this axis will promote the competitiveness of the agricultural and forestry sector, and will thus contribute to Lisbon's strategic objectives on economic growth and jobs.

The RDP addresses the second NSPRD objective ('Protecting natural resources and environment of rural areas') by the measures proposed in Axis 2, and by the targeting of measures under the other axes. To Axis 2 is allocated 27 per cent of the Community contribution under the three axes. The NSPRD and the RDP are based on a balanced and integrated approach, where the preservation of the landscape and environment is also a priority for measures under the other axes.

The NSPRD objective 'to improve the quality of life and diversify job opportunities in rural areas' will be delivered under the RDP by measures under Axis 3. To Axis 3 is allocated 31 per cent of the Community contribution under the three axes. Improved access and quality of basic services for the rural population, as well as rural infrastructure, are essential for maintaining the rural population and for the creation of conditions for business development and environmental protection.

NSRDP priority 4, 'To build local capacity and to improve local governance', is integrated in the RDP, and the Leader Axis is allocated 2.6 per cent of the Community contribution under the three axes. The Leader measures will support building social capital and skills acquisition to develop locally based strategies for rural development. The implementation of such strategies will contribute to the overall objectives of the NSPRD.

The level of synergy appears to be good, and there is no obvious conflict among the objectives. The

ex-ante analysis of individual RDP measures has given no indication that they duplicate one another. In general the measures provide clear and well defined objectives.

## 2.1 Forest-related measures in the Bulgarian RDP 2007-2013

Council Regulation 1698/2005, on support for rural development by the EAFRD, provides a package of forty measures for achieving the Community Strategic Guidelines for 2007–2013. Bulgaria has proposed thirty measures to be implemented under its RDP. For the other ten Regulation measures, which will not be implemented, no funding has been allocated in the RDP and they are not to be drafted.

The implementation of the RDP will start with 23 measures.<sup>8</sup> These measures will be implemented over the entire programming period 2007–2013, with the exception of a small number of measures which will be implemented up to the end of 2009 ('Provision of farm advisory and extension services in Bulgaria and Romania', according to Annex VIII, Section I D of the Act of Accession of Bulgaria and Romania, 2007–2009, and the submeasures 'Running costs, acquisition of skills and animation – potential LAGs' and 'Complements to direct payments'). Seven measures will be introduced at a later stage, after a change to the RDP to introduce the relevant measure details in line with the procedure in Article 6 (c) of Commission Regulation (EC) no. 1974/2006.<sup>9</sup> Their budget for the period 2007–2009 will be allocated to other measures.

Table 1 provides an overview of all forest and forestry-related measures included in the Bulgarian RDP, including their programming period. From the total of thirty measures in the Bulgarian RDP, eleven directly target forest or forest-related issues.

**Table 1 – Forest-related measures in the Bulgarian RDP 2007–2013<sup>10</sup>**

Axis	Measure		Programming period
Axis 1 – Improving the competitiveness of the agricultural and forestry sector			
1.	111	Training, information and diffusion of knowledge	2007–2013
2.	114	Use by farmers and forestry holders of advisory services (years 2010–2013)	2010–2013
3.	122	Improving the economic value of the forests	2007–2013
4.	123	Adding value to agricultural and forestry products	2007–2013
5.	125	Improving and developing infrastructure related to the development and adaptation of agriculture and forestry	2009–2013
Axis 2 – Improving the environment and the countryside			
6.	223	First afforestation of non-agricultural land	2007–2013
7.	226	Restoring forestry potential and introducing prevention actions	2007–2013
8.	224	Natura 2000 payments for forests	2009–2013
Axis 3 – Quality of life in rural areas and diversification of the rural economy			
9.	312	Support for the creation and development of micro-enterprises	2007–2013
Axis 4 – Leader			
10.	41	Implementation of the local development strategies	2007–2013
11.	421	Interterritorial and transnational cooperation	2007–2013

In terms of forest and forestry-related measures, three of them will start their implementation after 2009. These are 'Use by farmers and forestry holders of advisory services', 'Improving and developing

<sup>8</sup> Listed in Table 24 of the Bulgarian RDP, presented here in Annex 1.

<sup>9</sup> Listed in Table 25 of the Bulgarian RDP, presented here in Annex 2.

<sup>10</sup> A comprehensive description of the objectives and activities of each measure is attached in Annex 3.

infrastructure related to the development and adaptation of agriculture and forestry', and 'Natura 2000 payments for forests'. The implementation of the measure 'Use by farmers and forestry holders of advisory services' will start in 2010; it will replace the measure 'Provision of farm advisory and extension services in Bulgaria and Romania', which will be implemented in the first three years of the RDP in line with the provisions of Annex VIII to the Act of Accession of Bulgaria and Romania. There is a need for additional preparation and capacity-building before the measure for 'Improving and developing infrastructure related to the development and adaptation of agriculture and forestry' can be implemented, and forests will not benefit from its budget till 2010. Natura 2000 measures for agricultural lands and forests depend on the formal designation of Natura 2000 sites and on the preparation of their management plans. Therefore the measures will be implemented after the establishment and entry into force of clear restrictions on the agricultural and forestry activities, either in the orders for the designation of the sites or in their management plans, which are expected to be in place after 2009. The process of issuing the orders for the sites designated according to the Birds Directive has already started, and the first order has been published in the Bulgarian SG no. 100/30.11.2007. The orders for the designated protected zones according to the Habitats Directive will not be issued before 2009 at the earliest (as these sites need to be approved first at Community level). Before the designation and/or entry into force of related requirements for land management, all Natura 2000 sites (both SPA and SCI sites on lists adopted by the Bulgarian Council of Ministers) will be regarded under the RDP as HNV farmlands and will be supported under the measures for HNV farmland and arable land management. Private forest owners will not benefit from the 'Natura 2000 payments for forests' measure until its entry into force in 2009, and this delay is likely to have a negative impact on forest protection (RDP 2007–2013).

Table 2 gives information on the types of activities that the RDP's forest-related measures are supporting.

**Table 2 – Classification of RDP forest-related activities**

Category	Code	Measure
Commercial forestry	122	Improving the economic value of the forests
	123	Adding value to agricultural and forestry products
	125	Improving and developing infrastructure related to the development and adaptation of agriculture and forestry
	223	First afforestation of non-agricultural land
	226	Restoring forestry potential and introducing prevention actions
	312	Support for the creation and development of micro-enterprises
Environmental practices	224	Natura 2000 payments for forests
Training and information	111	Training, information and diffusion of knowledge
	114	Use by farmers and forestry holders of advisory services (2010–2013)
Others	41	Implementation of the local development strategies
	421	Interterritorial and transnational cooperation

It is evident from Table 2 that most of the measures are dedicated to commercial forestry. In order to prevent any potential negative impact they may have on nature, for actions including support to investments, a positive environmental impact assessment (EIA) decision will be mandatory, with the exception of those cases where an EIA is not required by the Environment Protection Act. All investment projects falling in Natura 2000 sites will be checked before their approval for compliance with the provisions of the national Biodiversity Act and the respective secondary legislation for its implementation, as well as the envisaged restrictions in the decisions for the site designation and management plan. Investments directly focused on preservation of the environment are given priority under Axis 1 (RDP 2007–2013). Only one measure is designed to provide the forests with environmental protection. Unfortunately its

implementation, as described above, will start later; and this will hamper the protection and sustainable management of the Natura 2000 forests. Four additional measures indirectly target forests and could have an impact on their management and conservation.

## **2.2 Allocation of RDP funds for forest-related activities**

Money from the EAFRD is going to certain forest-related activities in Bulgaria. However, the actual amount cannot be estimated accurately, because forest-related activities are included in joint measures with agricultural and other activities, and no demarcation of funds between the activities has been made. Table 3 provides information about the amount of funds allocated to the forest-related measures in the RDP, on the percentage of these amounts from the total budget of the RDP and what this money may be used for generally.

The BG grand total budget of the RDP for the period 2007–2013 is approximately €4.278 billion. The amount of public expenditure is around €3.242 billion. 80 per cent of the public expenditure will be secured through the EAFRD. The indicative size of the funds by the EAFRD for the 2007–2013 period amounts to €2.6 billion.

The total sum related to forestry, and forest/agriculture, from the BG grand total budget is around €1.127 billion. The total public expenditure for these measures consists of approximately €730 million, 80 per cent of which (around €584 million) will come through the EAFRD.

The subsidies going explicitly to forests from the BG grand total budget amount to €133 million, of which only the Natura 2000 payments for forest can be described as being purely for forest protection. The latter consists of €15.5 million indicative public expenditure. The amount whose allocation between forest and agriculture cannot be distinguished is €994 million. The measure 'Adding value to agricultural and forestry products' receives the highest sum, almost €535 million. Regarding forestry, this sum will support investments relating to the use of wood as a raw material, and is limited to all working operations prior to industrial processing. A significant amount will go towards infrastructure and the development of micro-enterprises. The latter measures cover predominantly commercial forestry-related actions, and could improve the economic benefit from the forests; but they have no direct relation to forest conservation, and if not correctly planned might even lead to forest destruction (e.g. the building of forest roads could make the access to biologically valuable and old-growth forests easier, and lead to the destruction of important habitats). Those measures that could have a negative impact on nature should require an obligatory EIA.

As described above, three of the forest and forest-related measures will start their implementation after 2009. In the meantime, their budget will be allocated to other measures.

Till its implementation in 2010, the indicative financial allocation of the measure 'Use by farmers and forestry holders of advisory services' is provisionally transferred to the measure on 'Training, information and diffusion of knowledge', which also concerns forest-related issues and will enable the introduction of (for instance) forest-related training.

The indicative budget for the measure for 'Improving and developing infrastructure related to the development and adaptation of agriculture and forestry' is transferred to the budget of the measure 'Modernisation of agricultural holdings', and forests will not benefit from its budget till 2010.

The budget for the measure 'Natura 2000 payments for forests' has provisionally been allocated to the measure 'Agro-environmental payments', and farmers in the potential Natura sites can apply for support under this measure. Private forest owners will not benefit from the 'Natura 2000 payments for forests' measure until it comes into force in 2009, and this is likely to have a negative impact on forest protection.

**Table 3 – Funding for forest-related activities in the Bulgarian RDP**

Code	Measure	Funds allocated (€)	What the measure could be useful for
111	Training, information and diffusion of knowledge	102,413,694* public expenditure (ca 3.15 per cent of the BG grand total public expenditure)	Training courses Information actions Working meetings
114	Use by farmers and forestry holders of advisory services (years 2010–2013)	36,146,000 indicative public expenditure (ca 1.1 per cent of the BG grand total public expenditure)	No description in the RDP available
122	Improving the economic value of the forests	24,097,340 public expenditure (ca 0.74 per cent of the BG grand total public expenditure)	Creation of sustainable forest management plans and programmes for non-state owned forests Management activities aiming at increasing the economic value of the forest (e.g. pruning of coniferous plantations, lightening and tending in coppice stands, etc.) Purchase of suitable harvest equipment
123	Adding value to agricultural and forestry products	240,973,396 public expenditure (ca 7.4 per cent of the BG grand total public expenditure)	Introduction of new and/or modernisation of the existing facilities and improvement in their use Introduction of new products, processes and technologies Reaching compliance with EU standards Environmental protection (including decreasing pollutant emissions and waste) Reduction of production costs
125	Improving and developing infrastructure related to the development and adaptation of agriculture and forestry	90,365,000 indicative public expenditure (ca 2.8 per cent of the BG grand total public expenditure)	No description in the RDP available
223	First afforestation of non-agricultural land	40,424,494 public expenditure (ca 1.25 per cent of the BG grand total public expenditure)	Afforestation of abandoned agricultural land and not afforested forest fund lands Development of technological plans for afforestation Site preparation for afforestation Seeding and planting Actions for guided natural succession Fencing
226	Restoring forestry potential and introducing prevention actions	29,540,976 public expenditure (ca 0.91 per cent of the BG grand total public expenditure)	Clearing of forests damaged by fire, windstorms and other natural disasters Establishment and improvement of timber depots in case of disasters Reforestation of damaged forests using indigenous tree species Establishing and improving fire protection facilities Diversification of vegetation structure by transforming coniferous plantations into broadleaved or mixed stands
224	Natura 2000 payments for forests	15,548,000 indicative public expenditure (ca 0.48 per cent of the BG grand total public expenditure)	No description available in the RDP
312	Support for the creation and development of micro-enterprises	127,261,669 public expenditure (ca 4 per cent of the BG grand total public expenditure)	Investments and marketing and management advice for new and existing micro-enterprises in non-agricultural sectors such as: • <i>Processing industry</i> – furniture production, light engineering, etc. • <i>Renewable energy production</i> : • <i>Services</i> – rural tourism initiatives by private enterprises, recreation and sports, setting up or development of consultancy and business services, social and health care, transport services, etc.
41	Implementation of the local development strategies	53,891,814 public expenditure (ca 1.67 per cent of the BG grand total public expenditure)	Any activities within measures under Council Regulation 1698/2005 selected in the RDP under Axis 1, Axis 2 and Axis 3 Other actions outside the scope of the measures specified in Council Regulation 1698/2005 if they contribute to the objectives of the RDP and the local development strategies and aim at protection of the environment, rural landscape and local identity
421	Interterritorial and transnational cooperation	5,132,554 public expenditure (ca 0.16 per cent of the BG grand total public expenditure)	Preparatory technical support including feasibility studies, market research, surveys, etc.; and/or technical planning; and/or partnership meetings Implementation of joint actions (e.g. establishment of facilities for joint production of goods or services, joint marketing of local products, preservation of shared natural or cultural heritage, etc.)

\* Including the indicative budget for the measure 'Use by farmers and forestry holders of advisory services' (years 2010-2013)

## 2.3 The RDP and forest and biodiversity related official documents on national level

### 2.3.1 National forest programme

Bulgaria currently has no national forest programme. A National Forest Policy and Strategy 2003–2013 was developed in 2002 in the framework of the preparation phase of the project ‘Bulgaria – development of the forest sector’; however, the strategy was not approved by the Bulgarian Parliament due to various circumstances, and so the document has no legal power.

Two other strategic documents for the forest sector were developed on the basis of this strategy in terms of Bulgaria’s accession to the EU, the need to discuss forest-related problems in Bulgaria, and the need to reflect the outcomes from major forest-related processes at the national, European and global levels. These two documents are the ‘National Strategy for Sustainable Development of the Forest Sector in Bulgaria 2006–2015’ and the ‘Strategic Plan for Forest Sector Development 2007–2011’ (SPFSD). They were both adopted officially in 2006 (the National Strategy at the beginning of the year, and the SPFSD in November 2006 by the former Minister of Agriculture and Forests).

‘The National Strategy for Sustainable Development of the Forest Sector in Bulgaria 2006–2015’ analyses the current status of the different features and branches of the forest sector in Bulgaria, defines their strengths and weaknesses, and proposes strategic objectives and measures for meeting them.

The SPFSD is devoted to implementing the National Strategy. It came into force at the beginning of 2007. The plan defines four overall strategic objectives in line with the National Strategy, and lays out key measures for their implementation.<sup>11</sup> The main objective of the SPFSD is ‘to achieve sustainable development of the economically viable forest sector based on the principles for multifunctional and sustainable forest management’.

One part of the national plan is an action plan that includes concrete activities for every strategic objective and key measure, and contains an indicative budget for them. The SPFSD has been harmonised with the European Forest Action Plan and was approved by the Minister of Agriculture and Forests. Below, we examine whether the RDP is in line with it.

The financial means for implementing the SPFSD will be secured through the funds of the State Agency for Forestry, but additional funds will also be needed. In this regard, much emphasis has been put on the money expected from the various EU funds such as the EAFRD.

According to the SPFSD, €570 million will directly or indirectly support its implementation and the forest sector as a whole, and this money will come from the rural development fund. €85 million of this will be allocated to supporting non-state-owned forests. The plan’s implementation relies on the EAFRD for a number of actions: improving the economic value of forests, development of their tourism potential (including the initiation of business partnerships between tourist companies and forest authorities), agro-forestry management, increasing the qualifications of foresters, establishing consultancy offices for consultancy services, achieving favourable conservation status of species and habitats in Natura 2000 sites, supporting restoration measures for degraded forest ecosystems and threatened species, afforestation, the production of biomass for energy (including the creation of forest plantations of fast-growing species), introducing fire prevention measures, elaborating regional plans and measures for enhancing the protective functions of forests, supporting plans for the utilisation of forests surrounding settlements, and developing mechanisms for interaction between forest owners and foresters, forest users and consultancy companies.

<sup>11</sup> The strategic objectives and the key measures of the SPFSD are presented in Annex 4.

In general the RDP takes direct account of some of the SPFSD objectives and key measures. Sustainable development of the forests will be addressed mainly through the improvement of forest resources and the restoration of forest potential. The RDP measures on 'Improving the economic value of the forest' and 'Improving and developing infrastructure related to the development and adaptation of agriculture and forestry' will contribute to the improvement of the quality and the economic potential of the forests, and to sustainable and rational timber use. According to the Bulgarian forest authorities, the improvement and expansion of the forest road infrastructure is a key issue for enhancing the competitiveness of the sector. However, we believe that efforts should concentrate on improving the existing infrastructure rather than on building new roads. Forest road construction could have a negative impact on nature and biodiversity – for instance due to increased access to and destruction of old-growth forests and other important habitats, increased fire risk due to human activities, and forest fragmentation. The Bulgarian authorities are not obliged to perform an EIA, since the Forest Management Plans they are included in are subject to EIA as a whole. Careful planning of the forest infrastructure is therefore crucial for avoiding negative impacts on nature. Improving the quality and economic value of the coppice forests and conifer plantations could decrease the pressure on the old valuable forests and the need for road building to untouched preserved forests.

The RDP will also guarantee funds for research and technological development in order to increase the competitiveness of the forest sector, e.g. through the measures on 'Training, information and the diffusion of knowledge' and 'Support for the creation and development of micro-enterprises'. The measure on 'Interterritorial and transnational cooperation' could contribute to capacity-building and the sharing of experiences among forest experts and forest managers both from Bulgaria and from abroad. The RDP will also encourage cooperation between forest owners, branch organisations and associations, in supporting education and the gaining of qualifications in the field of silviculture.

Increasing the value of non-timber forest products and services is another priority of the SPFSD that could be supported through the RDP, e.g. through the RDP measure 'Adding value to agricultural and forestry products'.

A crucial measure is the one concerning Natura 2000 payments for forests, since it is the only RDP measure that will contribute directly to the conservation and maintenance of forest biodiversity. Compensation for forest holders whose lands fall within the Natura 2000 network will be of major significance for the preservation of biodiversity. The measures target the conservation of different habitats and species included in the respective orders and management plans that Natura 2000 site landowners will be obliged to respect. Due to problems and delays in the establishment of the Natura 2000 network in Bulgaria, the measure will not come into force till after the beginning of 2009. No compensation payments for private forest owners will be available before then, and this could lead to the loss of many valuable private forests.

The RDP will also have a role in achieving the SPFSD objective of contributing to the implantation of the UNFCCC and Kyoto Protocol. The afforestation activities under the measure 'First afforestation of non-agricultural land' will be aimed at transforming low-quality abandoned land into forests, resulting in increased carbon sequestration, reduced soil erosion, improved water balance etc. To ensure that this measure has no negative impact on biodiversity, indigenous tree species should be chosen for this afforestation. In the RDP, priority is given to local tree species but this condition is not obligatory. Through encouraging the use of renewable natural resources and improvements in the effectiveness of used resources, leading to a reduction in fossil fuel consumption, climate change mitigation would also be fostered.

The measure 'Restoring forestry potential and introducing prevention actions' would redound to the improved protection of forests against disasters, and to maintaining and improving the forest protective functions. This is particularly important in view of the high number of forest fires in Bulgaria in recent years. These forest fires not only caused substantial loss of timber but also triggered dramatic and

negative changes in the mechanical and microbiological texture of the soil in affected areas, which in turn quickly led to soil erosion. Forest fires also led to the poorer composition of forest plant species, to reduced biodiversity and lower sustainability of forest ecosystems. The RDP could do a great deal to decrease the risk of forest fires.

Other key measures of the SPFSD could possibly also be supported through RDP funds. For instance, improvement of sectoral and inter-sectoral cooperation and communication could be encouraged through the RDP measure on 'Implementation of the local development strategies'. Funds from the RDP could be used for the development of regional or local strategies for forest development as a part of the regional or local development strategies.

Some objectives and key measures from the SPFSD, however, are not taken into account.

The SPFSD envisaged the funds for enhanced implementation of agro-silvicultural systems to come through the RDP, but the establishment of the agro-forestry systems is not included in the RDP.

Funding for the establishment of forestry advisory services under KM 5 ('Encouraging cooperation between forest owners, branch organisations and associations for support to education and qualification in the field of silviculture') is also expected to come from the RDP. The RDP measure 'Provision of farm advisory and extension services in Bulgaria and Romania' (2007–2009) envisages advisory assistance just for the agricultural sector. Until its successor measure ('Use by farmers and forestry holders of advisory services') comes into force (2010–2013), this activity could be partly funded through the RDP measure on 'Training, information and diffusion of knowledge'. The ex-ante evaluation of the RDP recommends extension of 'Provision of farm advisory and extension services in Bulgaria and Romania' and also the inclusion of advisory services to forestry holders, but this recommendation is not taken into account in the RDP.

The SPFSD key measure on conservation and maintenance of forest biodiversity has also not been adequately considered. Funds in the RDP are envisaged mainly as compensation payments to Natura 2000 private forest owners. However, this will not secure the implementation of the entire key measure. The SPFSD relies on funds from the EAFRD for supporting the restoration of degraded forest ecosystems and the populations of some endangered forest-dependent species, activities which are not included in the RDP itself. In general the funds (and measures) for securing and preserving the forests and their biological diversity envisaged in the RDP are insufficient – e.g. no forest environment payments are foreseen, and funds for conservation and upgrading of the rural heritage are also not available. Forests outside the Natura 2000 network are left without any funding for protection from the RDP. This is explained partly by the assumption that funds for such activities will come mainly from other EU structural funds.

In general the RDP is in line with the objectives of the SPFSD. However, it is not expected that there will be enough money in the RDP for funding SPFSD activities, in particular in terms of preserving forest biodiversity and the development of agro-silvicultural systems.

### **2.3.2 National biodiversity action plan**

The National Plan for Biodiversity Conservation 2005–2010 (NPBC) was prepared in accordance with Article 115 of the Biodiversity Act and Article 77 of the Environmental Protection Act, and was approved in 2005.

The long-term strategic objective of the NPBC is 'protection, restoration and sustainable management of the Bulgarian biological diversity in order to create optimal conditions, environment and perspectives for human life'. The more immediate strategic objective of the NPBC is to 'halt biodiversity loss in Bulgaria by 2010'.

The plan has, in addition, four operational objectives<sup>12</sup> and key measures, together with six priorities and nine measures and activities for their implementation.

According to the ex-ante evaluation of the RDP, the relationship between the National Biological Diversity Conservation Strategy (NBCS) and the NSPRD is clearly formulated in both documents. The relationship between the RDP and the NPBC, however, is not.

The second strategic goal of the NSPRD, 'to protect natural resources and environment of rural areas', which will be addressed by specific measures of the RDP, is complementary to the following operational objectives of the NPBC: 'Protection and restoration of species, habitats, ecosystems and landscapes' and 'Sustainable use of the biological resources'.

The implementation of the Priority Axis 2 of the RDP is the most appropriate instrument for ensuring the achievement of the objectives of the NPBC. A considerable part of the total budget of the RDP (€777 million, or 25 per cent of the total budget, excluding complements to direct payments) is allocated to measures of Axis 2 specifically related to environmental protection.

Axis 2 measures cannot resolve all problem issues related to environmental and landscape protection, however. Therefore a balanced and integrated approach is needed, identifying landscape and nature conservation as a priority for the measures under the other axes.

As intensive agriculture and forestry are recognised worldwide as being some of the biggest threats to biodiversity, the first objective of NSPRD – 'to develop a competitive and innovation-based agricultural, forestry sector and food-processing sector' – could be in conflict with the objectives of NPBC. There is a need for careful planning, and for a set of prevention mechanisms in order to avoid contradiction with the nature conservation legislation at the national, international and European Union levels, as well as with the environmental objectives under the NPBC. On the other hand many of the measures financed by Axes 1 and 3 (and as a consequence by Axis 4) are designed not only to avoid any negative impact, but in some way to contribute to achieving the general objective of protecting and improving the environment.

Although it is difficult to identify precise quantitative indicators to measure the impact on biological diversity, and thus the impact on the implementation of the NPBC, the RDP in general (not just Axis 2) could be expected to have a positive influence on these issues.

Several measures could contribute directly or indirectly to the protection, maintenance and enhancement of local biodiversity in terms of forests (e.g. Natura 2000 payments for forests, and the measures on 'Restoring forestry potential and introducing prevention actions', and 'Training, information and the diffusion of knowledge'). The measure on 'First afforestation of non-agricultural land' could contribute to the augmentation of carbon sequestration and thus to climate mitigation, and this could have a positive impact on the NPBC's operational objective, 'Prevention and negative impact mitigation on biological diversity caused by climate change and adaptation to them'. However, an important prerequisite for this is afforestation with native species adapted to the local environmental conditions. It is stated that all planting will be for environmental purposes only, and that local species will be given priority, but there are no specific provisions ensuring that the planned actions within this measure are suited to local conditions and compatible with the environmental requirements, particularly biodiversity.

Other indirect but positive effects of the RDP come from the creation of an interest in the population of the rural areas concerning the preservation of biodiversity: for example the enterprises dealing with rural tourism have a specific interest in preserving natural beauty.

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12 These are 'Protection and restoration of species, habitats, ecosystems and landscapes. Conservation of genetic diversity and bio-safety', 'Maximal integration of the biodiversity concerns in the national environmental and sectoral legislation and in the national policies and programmes', 'Sustainable use of the biological resources' and 'Prevention and negative impact mitigation on biological diversity caused by climate change and adaptation to them'.

Training activities could have a positive effect, by introducing more modern and environmentally friendly management systems in forestry enterprises. However, the training under the measure 'Training, information and the diffusion of knowledge' does not currently address the environmental problems related to biodiversity conservation clearly enough. If relevant training is not included in the measure, it could lead to the preparation and implementation of projects with negative impacts on biodiversity.

Although the RDP respects the Protected Areas system, no clear relationship has been developed between the measures defined under Axis 1 and the protected areas. Yet this is necessary, because half of the territory of the Protected Areas system does not have strict protection regime. Axis 2 and Axis 3 partially address these requirements in the scope of the definition of the measures set there. The same applies also to the Natura 2000 network. Despite the RDP aspects of Nature 2000, no clear relationship has been developed between measures defined under Axes 1 and 3 and Natura 2000. Compensating forest owners for land within the Natura 2000 sites will be crucial to implementing measures for the conservation of habitats and species included in the local management plans for these areas, which corresponds to the first operational objective of the NPBC, 'Protection and restoration of species, habitats, ecosystems and landscapes'. With regard to forests, this compensation will start relatively late, which will be an obstacle to the preservation of valuable forest habitats and could impair the objectives of the NPCB.

The RDP measure 'Improving and developing infrastructure related to the development and adaptation of agriculture and forestry', and in particular the building of the forest road infrastructure, if not carefully planned, could cause destruction and fragmentation of habitats at the local scale and thus violate the NPCB's operational objective, 'Protection and restoration of species, habitats, ecosystems and landscapes'. In order to avoid negative impacts on biodiversity, an EIA for the construction of forest roads should be conducted, and no forest roads should be built in ancient forest areas or closed basins which are home to forests of high natural value.

In general, the RDP is not in line with the NPBC in terms of forests. The relationship between the RDP and the NPBC is not clearly enough formulated. The RDP puts emphasis on commercial forest-related issues in the RDP, above the environmental practices and the measures aimed at diffusion of information and capacity-building. Due to the later starting point of the Natura 2000 payments, and the lack of other measures aimed at forest conservation such as forest-environment payments and non-productive investments, the RDP will not contribute much directly to the implementation of the NPCB concerning forests and their preservation.

## **2.4 The RDP and EU measures for protecting biodiversity**

Forest-related measures, including biodiversity-enhancing activities such as forest-environment payments, Natura 2000 payments and non-productive investments in forests as well as the establishment of agro-forestry systems, have not been developed in the current RDP of Bulgaria. Natura 2000 payments were postponed to the period 2009–2013, while the EU Forest Action Plan, the FLEGT Action Plan and the Biomass Action Plan will not be included in the programme at all. Priority forest-related measures dominating the RDP are: improving the economic value of forests, adding value to forest products, and afforestation. From this we can draw the simple conclusion that the programme's emphasis is a long way from making a direct contribution to species and habitat conservation, and will not contribute to the EU target 2010 when it comes to forest ecosystems.

The explanation for the postponement of the Natura 2000 measures for agricultural lands and forests is the lack of any formal designation of Natura 2000 sites, and the lack of ordinances for designation and management plans, and therefore the lack of clear restrictions on agricultural and forestry activities. The budget for the Natura 2000 measure is allocated to agro-environmental payments, and the farmers in the potential Natura sites can apply for support under this measure. Forest owners, however, cannot apply.

### 2.4.1 The 2010 target and the RDP

It has been realised that the loss of biodiversity is of concern not just because of the important intrinsic value of nature, but also because it results in a decline in the 'ecosystem services' which natural systems provide. These services directly affect the quality of human life. Concern for biodiversity is integral to sustainable development and underpins economic growth, employment and improved living standards. In 2001, heads of the EU member states addressed biodiversity loss by making the commitment to 'halt the decline of biodiversity by 2010'. Key measures towards meeting the 2010 commitment are considered in various policy areas. A number of documents have the underlying objective of halting biodiversity loss by 2010: the EU Sustainable Development Strategy, the 6th Environmental Action Programme, the EC Biodiversity Strategy (providing a response to the requirements of the CBD) and Action Plan.

Meeting the 2010 target is a responsibility shared between member states and the European Community. Of the most powerful EU policies, the Common Agricultural Policy, is designed to protect the environment as well as dealing with food production. The second pillar – Rural Development – is expected to be one of the most effective tools for member states, with financial help from the EU, for enhancing biodiversity in their rural areas.

The Commission communication entitled 'Halting the loss of biodiversity by 2010 – and beyond' (dated 22 May 2006) defines the four key policy areas and ten objectives to be fulfilled in order to achieve the 2010 goal. How well has the Bulgarian government used its RDP in order to achieve these goals?

*Objective: to safeguard the EU's most important habitats and species*

One of the elements of the EU approach to stop the loss of biodiversity is the creation and protection of a substantial network of sites of highest nature value – Natura 2000. The two EU Nature Directives have been transposed in the Bulgarian legislation through the Biodiversity Act (BA), which was adopted in August 2002 and amended three times during the last year. 114 sites were proposed to be designated as Special Protection Areas whose total area covers 1,854,449 ha, 48 per cent of them forests, and 39 per cent agricultural land. 196 protected zones were proposed according to the Habitats Directive, covering an area of 1,733,272 ha, 68 per cent of which is made up of forests and semi-natural areas. Natura 2000 contributes considerably to the size of the currently protected network. The latter is only 5 per cent of country's territory, while the sites approved by the Government cover about 31 per cent out of 33.8 per cent proposed.<sup>13</sup> It is acknowledged in the RDP that the species composition of forests is very rich, and most biodiversity in Bulgaria finds its natural habitat in the forests. This results from the bio-geographic position of the country, altitudinal differences: from sea level up to 2,900 m and diverse relief and bed rocks. Nevertheless, among the factors causing pressure on biodiversity recognised in the RDP (Chapter 3.1.3, Biodiversity) there are none associated with forests but only with agriculture and coastal zones.

The draft version of the RDP from January 2007 included measures specifically oriented towards better implementation of the Natura 2000 sites management regimes: Natura 2000 payments in agricultural and forest areas. At the moment these measures are temporarily removed and postponed for implementation after the beginning of 2009. To become beneficiaries, the users and owners of the land should be registered in the Integrated Administrative and Control System (IACS). The system was developed on the basis of aerial photographs and is in place for agricultural land only. There is clearly an obstacle in using this measure for forests since to be able to register the system should be developed first. Even if the measure 'Natura 2000 payments for forests' starts in 2009, it is highly unlikely that there will be a functioning registration system for forest owners. On the other hand it is not clear whether the same method will work for forests, since aerial photographs can hardly give any information about the forest, other than how large a clear cutting area is.

<sup>13</sup> Council of Ministers, Decision no. 802 from 4 December 2007. List of approved protected zones for wild birds and nature habitats. State Gazette.

The main objective of the measure 'Natura 2000 payments for forests' is to encourage owners and users of forests and forest land to apply measures and activities to ensure the protection, maintenance and/or recovery of the favourable conditions for the species and natural habitats listed in Annexes 1 and 2 of the Biodiversity Act. Low effectiveness of this measure is driven by the fact that only non-state forests are eligible for compensation, and few non-state forests fall in the Natura 2000 network. State forest, on the other hand, comprising almost 80 per cent of the forested territory of the country, is characterised by high nature value. The state, however, cannot be compensated for income lost due to management restrictions. Therefore state forest authorities are reluctant to respect the limitations imposed by the management regimes. In the previous version of the programme where the measure was described, there was an obligation for beneficiaries to have rented the forest for at least five years. Five years is a very short period in the context of forest ecosystem processes, where main forest use happens once every 70–100 years. This just shows that the measure was inadequately developed and poorly thought out.

Payments will be delayed due to another factor. Considerable time is needed for ordinances of the sites to be issued and their management plans to be prepared. Until these plans are ready the restrictions are not known and compensation is not paid. The activities could be supported by agro- and forest-environment measures; but unfortunately this option does not exist for forests because the forest-environment measures are not included in the current RDP for the whole programming period.

*Objective: to conserve and restore biodiversity and ecosystem services in the wider EU countryside*

Even the most comprehensive protected area network will leave a lot of biodiversity outside its territory. Genuine species conservation cannot be adequately addressed using the site protection approach only. This is especially relevant to forestry because forest species do not tend to concentrate in small areas but are more widely dispersed. That is why it is equally important for EU action protecting biodiversity to spread over the wider environment. This could be achieved by dedicated nature policy, namely actions for threatened species; better connectivity of the Natura 2000 sites; and integration of biodiversity needs into agricultural, fisheries and other policies. Natura 2000 alone is not sufficient to secure forest biodiversity. It can only be secured by a holistic conservation approach, envisaging forests as functioning systems where the ecological quality of habitat plays a crucial role in sustaining the entire forest-dependent biodiversity.

There exists a National Agro-Environmental Programme from the SAPARD period, which will be implemented through the agro-environment measure of the new RDP. It includes maintenance and restoration of high nature value farmland and traditional agricultural landscapes; conservation of endangered local breeds of farm animals and traditional crop varieties; and increased awareness and knowledge among farmers about agricultural practices. These are expected to contribute to the achievement of favourable conservation status of species outside the Natura 2000 network. Some of these activities were planned to start in 2007.

Council Regulation 1698/2005 provides for a set of measures in support of sustainable forest management, such as forest-environment payments, non-productive payments in forests and the agro-forestry system. However, realisation of the full benefit of these measures remains in the decision of member states and the budget available. As mentioned above, these measures were not included in the RDP for Bulgaria. Afforestation on non-agricultural land is envisaged in the programme and it might be used for better connectivity of Natura 2000 sites, if appropriate restoration measures are undertaken. Apart from the benefits for carbon sequestration, increased availability of wood material and alleviating erosion, the measure could be used to create bridges between highly fragmented lowland forests. Supporting biodiversity is one of the objectives stated in the RDP afforestation measure giving 'priority to local tree species compatible to environmental requirements and biodiversity', but it is not obligatory.

*Objective: to reinforce compatibility of regional and territorial development with biodiversity in the EU, the EIA, and integration into regional and territorial development policy*

The nature directives and the Environmental Impact Assessment (EIA) directive require the consideration of potential impacts of certain regional and territorial developments. This includes consideration of alternatives and the design of measures to prevent and reduce negative impacts.

The Bulgarian RDP requires a mandatory EIA for actions including support to investments, with the exception of cases where EIA is not required by the Environment Protection Act. In addition, investment projects falling in Natura 2000 sites will be checked for compliance with the provisions of the national Biodiversity Act and the respective secondary legislation for its implementation, as well as the envisaged restrictions in the decisions for the site designation and management plan.

However, building new forest roads will not be subject to the EIA because the construction of roads is anyway considered to be part of the so-called Sustainable Forest Management Plans. These are in fact standard Forest Management Plans used during the last century or so. Although they are being upgraded, and the set of information they contain is being expanded, the plans still consider only the commercial value of timber, and biodiversity is hardly touched on. The density of forest roads in Bulgaria is considered insufficient by the forest administration, especially in the mountainous areas, which makes one sixth of the forest growing stock inaccessible. Hence it is very likely that a substantial proportion of the RD money will be used for forest road construction. Improving forest infrastructure is also a prerequisite for better competitiveness of the forest sector. Forest roads are included in the measure 'Improving competitiveness', and also in 'Restoring forestry potential and introducing prevention actions' – a measure covering actions such as the clearing of forests damaged by fires, windstorms and other natural disasters. All these actions can be potentially damaging for forest biodiversity.

Afforestation, outside Natura 2000 being done according to Ordinance No. 17 of MAF, is also not subject to EIA.

*Objective: to substantially reduce the impact on EU biodiversity of invasive alien species and alien genotypes*

Invasive alien species were identified in the 6th EAP as a priority for action. While support has been given to some localised eradication programmes via LIFE funding, the issue is not addressed specifically in the RDP. The measure for afforestation on non-agricultural land 'promises' that priority will be given to local tree species which have proved their compatibility with the environment and are suitable for restoring biodiversity. But there is no obligation to do this.

*Objective: to support biodiversity adaptation to climate change*

The RDP portrays Bulgaria as a country with a large potential for the production and utilisation of biomass. There is a national programme for promoting the use of renewable energy sources. According to this programme, the waste and unutilised biomass category includes: forestry by-products (branches and loppings), industrial wood residues (sawdust, bark, chops, black liquor, etc.), demolition wood, wood residues from parks and gardens, solid agricultural residues (straw, grain maize stems, sunflower stems, vine and orchard pruning, tobacco stems), manure from animal breeding farms, municipal solid waste, sewage sludge, cooking oil residues, and possible additional extraction of low-quality wood from forests. Energy crops include (among others) perennial energy crops: short rotation willow or poplar coppice.

It is believed that support for afforestation will contribute to the protection of the environment, as well as mitigating climate change. Restoring forestry potential will also contribute to climate change mitigation through the following actions: reforestation of damaged forests by using natural tree species; preventative actions against forest fires, e.g. establishing and maintaining fire protection breaks (e.g. cutting and clearing) and infrastructure (forest paths); and diversification of vegetation structure by

transforming coniferous plantations into broadleaved or mixed natural stands.

*Objective: to substantially strengthen the knowledge base for conservation and sustainable use of biodiversity, in the EU and globally*

The measure on 'Training, information and diffusion of knowledge' from the RDP emphasises the need for better qualifications in the sphere of the new technologies, renewable energy sources, bioenergy, and also sustainable management of the natural resources, including the requirements for cross-compliance. The training will cover the sustainable management of natural resources in compliance with EU legislation (cross-compliance, environmental standards, public health, etc.) In addition, diversification of the activities of those dealing in the agricultural and forestry sectors (rural tourism, craftsmanship, etc.) could contribute to the sustainable use of biodiversity.

Another measure – 'Use by farmers and forestry holders of advisory services' – could also contribute to this objective, but it will only become operational from 2010.

#### **2.4.2 Natura 2000 and the RDP**

The RDP will not contribute towards preservation of Natura 2000 sites in forests (see above).

#### **2.4.3 FLEGT Action Plan and the RDP**

The national RDP will not contribute to the FLEGT Action Plan. There is no mention of forest law enforcement or any other measures against the trade of illegal timber in the Bulgarian RDP. In 2005 the Government signed the St Petersburg Declaration, committing it to addressing illegal logging and forest crimes.

The document 'National Strategy for Sustainable Development of the Forest Sector in Bulgaria 2006–2015' admits that illegal logging in the country has grown considerably over the last ten years, and one reason for this is corruption in the forest sector. The problem is treated separately in the document 'Strategic Plan for Forest Sector Development 2007–2011' (SPFSD), which gives detailed actions for combating illegal logging in the country. At the national level the actions range from law enforcement and combating corruption in the forest sector, to promoting transparency of the local and international timber trade. In the national strategy it is recognised that poverty is an underlying cause of illegal harvesting. Broadly speaking it can be assumed that the RDP's aims to alleviate poverty in rural regions may have the effect of reducing the amount of illegally cut timber and to some extent lessen corruption at lower levels in the forest administration.

#### **2.4.4 Contribution of the RDP to the EU Forest Action Plan**

Objective 1 sets out to improve long-term competitiveness (key actions 4 and 5). Under this objective there are measures in the RDP for promotion of forest biomass for energy (contribution to biomass for energy is described in details below).

Education, training, and cooperation between forest owners can be distinguished in the following measures.

*Training, information and the diffusion of knowledge.* It is considered necessary for farmers and foresters to have good economic and technical qualifications in the sphere of the new technologies, renewable energy sources and bioenergy. It is expected that professional training will expand the opportunities for earning additional income and acquiring new knowledge. The support for vocational training under the measure is related to agriculture and forestry, and is only intended for agricultural producers and forest owners as well as for those employed in their holdings. All other types of vocational training will be supported under the Operational Programme Human Resources (European Structural Fund).

Training activities cover the sustainable management of natural resources in compliance with EU legislation (cross-compliance, environmental standards, public health, animal welfare, etc.) as well as basic training on general environmental issues including biodiversity. This is in fact the only measure that specifically mentions training related to sustainable management. The vocational training measure under Axis 1 will be used for acquisition of basic knowledge for the environmentally friendly practices in land management targeted under Axis 2.

*Interterritorial and transnational cooperation* enables the undertaking of joint trainings, capacity development, sharing experiences and the exchange of know-how.

With regard to cooperation, this is dealt with in the measure for modernisation of agricultural holdings, and improving vertical cooperation with the processing and manufacturing sectors, as well as in the measure on 'Adding value to agricultural and forest products', concerning improving horizontal cooperation with primary producers and cooperation among farmers. There is no cooperation for forest owners planned for support.

Objective 2 is to improve and protect the environment (key action 6, 'Mitigation of climate change'). The RDP's support for this action will be mainly through afforestation and use of biomass for energy. The anticipated result from the measure on 'Restoring forestry potential and introducing prevention actions' also assumes climate change mitigation. This measure is also the most relevant one to key action 9 – 'The protection of EU forests (prevention measures)'. It refers to prevention or alleviation of damage caused by forest fires, windstorms, insect infestation and floods. Bulgaria's forests have suffered a great deal from the above-mentioned natural phenomena, especially forest fires, over the last ten years. According to the Bulgarian Forest Act, the rural forested area should maintain its size, meaning that devastated areas need to be restored within two years. Money for such restoration is very scarce, and usually the forest owners do not succeed in reestablishing the forest cover. So it is assumed that such areas will become abandoned if not reforested. On the other hand it has been observed that burnt areas regenerate naturally faster and in a more stable manner than artificially reestablished forests. That gives an advantage, first because of diminishing costs, and secondly because natural regeneration preserves higher genetic diversity. In this regard, there should have been prioritisation of the allocation of money; first the improvement of preventative actions should be ensured, and then money should only go to the reforestation of damaged areas where there is some obstacle to natural reforestation.

The clearing of forests damaged by fires, windstorms and insects should be carefully considered since natural disturbances are phenomena creating benign conditions for biodiversity enrichment. Many species are dependent on fallen timber, which is common in natural forests. Removing it from any area therefore amounts to direct destruction of habitat for endangered and rare species.<sup>14</sup>

The construction, improvement and maintenance of forest paths, to give better access to forests so that forest fires can be extinguished more easily, can be seen as controversial. According to the National Forestry Board's statistics, about 95 per cent of the fires are associated with some kind of human activity, and 75 per cent of forest fires originate on agricultural land. This leads to the conclusion that fires happen at places accessible through roads. The construction of new forest roads will lead to increased access to the forest and therefore a higher risk of human intervention, and moreover it will cause fragmentation of the forests.

*Key action 9* includes additional subactions that were recommended to the member states by the EC. These subactions would considerably improve the environment, but none of them were taken into consideration in the RDP. Two examples that would have been favourable to biodiversity are the promotion of an agro-forestry system and the promotion of schemes for forest owners to engage in voluntary environmental commitments. These types of activities are not included in the RDP at all.

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14 Natural disasters can bring tragedy to many and profit to some; Forest Capers, issue 6, September 2007.

*Key action 7* – the goal 2010 is described above.

Objective 3 deals with the issue of contributing to the quality of life (see key actions 10 and 11). In principle the whole idea of the RDP is to improve living standards and the quality of life. As far as forests are concerned, the development of tourism may raise rural people's income. Prevention against fires and floods, envisaged in the measure 'Restoring forestry potential and introducing prevention actions', which will secure the protective functions of forests, can also contribute significantly to better and safer lives in rural regions.

The fourth objective, 'fostering coordination and communication', refers to a higher EU level and is not relevant in the case of any single country in isolation.

#### **2.4.5 Biomass Action Plan with reference to the RDP**

The RDP will contribute to implementation of Biomass Action Plan.

According to the national inventory, forest cover in Bulgaria is steadily increasing despite the fact that the rate of creation of new forests has dropped significantly over recent years. Due to lack of investment, only 5,000–7,000 ha of the 12,000 ha planned for afforestation annually is actually being afforested. Therefore there is a great potential for the afforestation of about 300,000 ha of abandoned and degraded agricultural land as well as non-forested forest land. According to the calculations of the National Forestry Board the total annual increment per year is 14 million m<sup>3</sup>, while annual harvesting is only 8.2 million m<sup>3</sup>, meaning that only 58 per cent of the yield potential is being used. The main reasons for this are lack of infrastructure, especially in mountainous areas where most of the growing stock occurs, and lack of investment for silvicultural activities in young plantations (a substantial part of which is less than 40 years old), where the revenue is equal or lower than the costs. The great potential for biomass production includes forestry by-products (branches and lopping), industrial wood residues (sawdust, bark, chops, black liquor, etc.), demolition wood, wood residues from parks and gardens, and the possible additional extraction of low-quality wood from forests. There is no fixed definition of 'low-quality wood', but one would assume that dead wood falls into this category. Perennial energy crops like short-rotation willow or poplar coppice are also one possible source of biomass. The whole RDP is generally very positive to the production and utilisation of biomass, assuming that it will increase the economic value of forests, and will create job opportunities for rural regions through the use of renewable energy sources and better management of the woody biomass as a whole. It is also a fact that there has been an increase in the use of timber for firewood, as the cheapest form of household heating. Over recent years the number of households using firewood has doubled, and now 40 per cent of households use firewood for heating and/or for boiling water.

To support the idea of biomass production, a number of measures from the RDP consider – directly or indirectly – timber harvesting for the production of biomass for bioenergy. However, unlike the EU Biomass Action Plan, the Bulgarian RDP does not mention any safeguards such as not harming biodiversity, careful felling and residue collection, etc.

The following measures in the RDP are directly related to the biomass production in the country. All of them were due to start in 2007.

*Adding value to agricultural and forestry products.* Eligible actions will support biomass production, investment for the production of energy from renewable sources, processing of primary and secondary biomass, and the purchase and installation of new machines and equipment for improvement of the production processing. The projects for bioenergy production for sale include a number of feasibility studies.

There are also various indirect measures supporting production of biomass for energy:

*Training, information and the diffusion of knowledge* includes courses and information activities for good

economic and technical qualifications in the sphere of the new technologies, renewable energy sources and bioenergy.

Improving the economic value of forests (owners of non-state forest eligible only) includes lightening and tending in coppice stands between one and ten years old; pruning of pine plantations younger than forty years; thinning in young coniferous (not older than forty years) plantations; and purchase of harvesting and skidding equipment – e.g. harvesters, motor saws, tractors and cable systems. All these activities would provide wood material for heat and energy generation. It is said that the actions under this measure are based on Sustainable Forest Management Plans, which are in fact just Forest Management Plans and do not contain sustainability principles except the one postulating ‘harvesting lower than increment’.

*First afforestation of non-agricultural land*, especially in the lowland region, will provide timber for energy for local people. According to the RDP, support for afforestation will contribute to the protection of the environment and biodiversity, and the alleviation of natural hazards and erosion, as well as helping to mitigate climate change. It should be noted that state forest holdings are also eligible for this measure. It is stated that all planting will be for environmental purposes only, and that local species will be given priority, but there are no specific provisions ensuring that the planned actions within this measure are suited to local conditions and compatible with environmental requirements, particularly biodiversity. Environmental effects could include climate change mitigation, for instance by afforestation with exotic species for biomass production. Only in Natura 2000 sites can afforestation be supported on the basis of management plans.

*Diversification into non-agricultural activities* will support production of renewable energy – bioenergy in the case of processing of raw materials coming from the producer’s own agricultural holdings.

Support for the creation and development of micro-enterprises is designed for job creation and investment in modernisation, and the growth of micro-enterprises, which would otherwise be too small to invest in their own development. Support will be given to investments and related external marketing and management services to develop business activity in non-agricultural sectors such as production of bioenergy to meet the micro-enterprises’ own energy needs; and/or for sale in the case of processing products (raw materials) not covered by Annex I to the treaty; and/or for sale from renewable energy sources (solar, wind, water, geothermal energy, etc.).

The measure will provide grant aid to the supported non-agricultural activities for external consultancy for developing marketing strategies, product development, advertising and publishing promotional materials.

The measure on *Basic services for the economy and the rural population* aims to improve living standards and to prevent depopulation through the diversification of services. The type of services supported includes installations for the production of electric power and/or heat for a municipality from renewable resources; and distribution networks for biofuels, or heat/electric power from biomass.

178 rural municipalities out of 231 will be supported if they introduce RES for municipality-owned buildings, and/or if buildings are used for the provision of different services for the community. Support will be provided for installations for the production of heat and/or power, and for setting up public distribution networks for biofuels or heat/power from biomass or other renewable sources.

The Bulgarian SPFSD, analogous to the EU FAP, contains subactions for the promotion of biomass for energy under the key action ‘Contribution to UNCCC and Kyoto Protocol’. It includes promotion of the use of forest biomass for energy, preparation of plans defining the part of the wood that should be used for energy, estimation of the forest biomass as a bioenergy resource, pilot projects for the use of forest biomass, legislation changes stimulating installations using woody biomass, and the creation of forest plantations from fast-growing species.

## **2.5 The process of developing the RDP**

The consultation process of RDP was well organised and covered the requirements of Article 6 of Council Regulation 1698/2005.

## **2.6 Non-Governmental Organisations**

### **2.6.1 NGOs and the development of the national rural development strategy**

A special working group was established to help guide the preparation of the RD programming documents. There were two environmental NGO representatives in this group. The group had seven meetings in the period 2004–2007. A major national seminar on rural development policy was organised in October 2005, and there were four national forums defining priorities in the National Rural Development Strategic Framework. The first draft NSPRD was presented at one national seminar and 16 regional ones. The second draft was also discussed at a national seminar. In May 2006 there was a large public hearing attended by 250 people. The plan was submitted to the EC in February 2007, which is a significant delay, bearing in mind that some of the measures were already supposed to have started at the beginning of 2007.

### **2.6.2 NGOs and the development of the national RDPs**

Seven working groups for Axis 1 measures, two working groups for Axis 2 measures, one working group for Axis 3 measures and one working group for Axis 4 Leader were established in the summer of 2006. After the official approval of the RDP, the measure working groups will form the basis of the Monitoring Committee's working subgroups.

A large number of regional seminars were also organised. Draft RDP and SEA documents were presented and discussed at a public hearing in December 2006.

The official draft from January 2007, which we used for drafting the current report, was updated and published on the Ministry webpage in December 2007. The programme structure was improved, and the changes are taken into account in the current report. The consultation period for the second draft was very short – one week – and information about it did not reach the stakeholders effectively enough.

There was a working group set up to deal with all forest-related measures. The group started a couple of months later than the other groups set for agricultural issues, and had only two meetings. The delayed start, together with the generally late establishment of the working groups, did not allow very productive and efficient work. In addition, the coordination of the group was very poor. The information within the group, including invitations for meetings, was not relayed very effectively. On occasion, venues and times for meetings were changed at very short notice. BSPB submitted an opinion<sup>15</sup> with rationale for the incorporation of forest-environment payments in the programme, but either this was not taken into account or it was not considered feasible. No answer was received by the relevant authority.

### **2.6.3 NGOs and their contribution to the SEA and ex-ante evaluation**

An NGO (BSPB) representative was invited to join the ex-ante team as an independent expert to make the strategic environmental assessment. During the assessment a questionnaire was sent to the interested parties for feedback on the programme. The programme was clarified and improved, taking into account the recommendations from the ex-ante report.

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15 See Annex 5, BSPB opinion with rationale for incorporation of forest-environment payments in the RDP.

#### **2.6.4 NGO participation in regional committees for implementing the RDP**

It is envisaged that an environmental NGO representative will be a member of the monitoring committee for the implementation of the RDP. This will be the head of the working group at the measures under priority Axis 2, 'Improving the environment and the countryside'. However, the members of this committee have not been chosen yet.

#### **2.7 Adherence to Article 6 of the RDR**

It appears that Article 6 of the RDR has so far been adhered to in the Republic of Bulgaria. The procedure during the preparation of the RDP as a whole included well organised consultation with the public. General discussions started in 2005. However, working groups on specific actions were set in mid-2006. In our opinion this should have happened earlier in order to ensure a proper consultation process, which is highly relevant for the working group set for discussion of forestry measures. The group had its meetings too late, and there was little time for giving feedback. The outcomes of these meetings were not publicised, and the coordination of the group itself was not properly done.

### 3 Conclusions

In the first drafts of the RDP, many of the measures were not well defined; and detailed strategies and procedures for their implementation were missing, especially in terms of the target of beneficiaries and/or geographical location. The programme was characterised by discrepancies and inconsistencies. After the first draft had been revised, the RDP was improved as a structure of information. However, much more attention is now paid to agriculture than to forests, which is only to be expected because of the experience gained during the SAPARD implementation.

As a very recent member state, Bulgaria has very little experience of having to deal with EU money, and this is reflected in the quality of the programme.

Forest environment payments as well as Natura payments are new for the whole Community, and they are hard to devise. Measures that would potentially have a very positive impact on biodiversity and the wider environment are not included in the programme. These are the establishment of the agro-forestry system, forest-environment payments, Natura 2000 payments for forests, and support for non-productive investment for forests. Business-focused measures prevail over those supporting the environment, even in Axis 2. This is partly because, in general, environmental protection is still seen as a mere set of rules and restrictions rather than a sustainable management practice capable of contributing to the diversification of the rural economy through the creation of alternative sources of income. Therefore an overall positive impact is expected on the economic timber values of the forests, rather than on their biodiversity.

#### 3.1 Ex-ante evaluation recommendations

There is a need to achieve a proper balance between the production of biomass and the conservation of valuable habitats, the landscape and the indigenous genetic resources, in order to avoid contradiction with the nature conservation legislation at the national, international and European Union levels, as well as with the environmental objectives under the NSPRD.

Regarding the afforestation of natural and semi-natural grasslands, as well as afforestation with non-indigenous species, there is a need for careful planning in order to avoid loss of biodiversity and conflict with nature conservation legislation.

Ex-ante SWOT analysis shows that there are insufficient financial resources for appropriate forest management and protection; poor integration of innovation in the agricultural and food-processing sectors; and, in forestry, inappropriate forest management, causing such problems as overexploitation and erosion.

#### 3.2 Lessons learned from SAPARD

The experience from the SAPARD programme revealed technical obstacles regarding access to financial resources. There are concerns that these obstacles have not been eliminated and will now emerge again with the EAFRD. The SAPARD report 'Far away from Brussels' (Za Zemiata 2005) demonstrated that the application procedure did not favour projects that contribute to the priorities of National Agriculture and Rural Development Plan; there was an unaccountable pre-selection of projects, corruption at the local offices of State Fund Agriculture, unclear and even unknown selection criteria, inability of the Agency to deal with project proposals, a large number of pending projects, and violation of SAPARD's procedural rules – all grounds for believing that large-scale decentralised corruption was present. Access to information was entirely absent, and a budget surplus was observed, resulting from the failure to implement enough measures and to guarantee the quality of SAPARD. The general conclusion of that report states that there was no indication that Bulgaria would be able to handle the funding through CAP. The same

can be expected to happen with the RDP if appropriate actions are not taken. The SAPARD experience should be kept in mind, especially considering the implementation procedures and monitoring of results. Full transparency needs to be guaranteed.

There was a measure for forestry projects in the SAPARD programme which was connected with afforestation of agricultural areas, investment in forest holdings, and the processing and marketing of forestry products. For the submeasure 'Timber sawing, carpentry and biofuels', 90 per cent of the beneficiaries were wood-processing companies. Although according to the eligibility criteria, beneficiaries should be farmers diversifying their income, in practice this criterion can easily be evaded by registering as a farmer.

The monitoring committee was strongly dominated by governmental stakeholders before NGO representatives gained more knowledge and became more forceful. The agro-environment measure was the only obligatory measure, showing its importance for the European Community. Over 40 per cent of the fund was dedicated to this measure. But since it is also the most complex it was implemented only in the final year (2006), out of six years of the programme, and could not provide experience for the implementation of this measure during next programming period (2007–2013).

Millions of Euros failed to reach their final destination during the implementation of the SAPARD programme, especially in vulnerable poor rural regions of the country. However well the RDP is developed, and however much the relevant stakeholders are consulted, it is still doubtful whether the good intentions can be implemented in practice. Efficient monitoring of its implementation and transparent approval processes will be crucial. Development of biodiversity-enhancing measures, which so far have been neglected, should take place as soon as possible and with the genuine involvement of all stakeholders.

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**Annex 1 – Table 24 of the RDP: measures starting in 2007**

Axis	Measure		Programming period
<b>Axis 1 - Improving the competitiveness of the agricultural and forestry sector</b>			
1.	111	Training, information and diffusion of knowledge	2007–2013
2.	112	Setting up of young farmers	2007–2013
3.	121	Modernisation of agricultural holdings	2007–2013
4.	122	Improving the economic value of the forests	2007–2013
5.	123	Adding value to agricultural and forestry products	2007–2013
6.	141	Supporting semi-subsistence farms undergoing restructuring	2007–2013
7.	142	Setting up producer groups	2007–2013
8.	143	Provision of farm advisory and extension services in Bulgaria and Romania (According to Annex VIII Section I D of the Act of Accession of Bulgaria and Romania, years 2007–2009)	2007–2009
<b>Axis 2 - Improving the environment and the countryside</b>			
9.	211	Natural handicap payments to farmers in mountain areas	2007–2013
10.	212	Payments to farmers in areas with handicaps, other than mountain areas	2007–2013
11.	214	Agro-environmental payments	2007–2013
12.	223	First afforestation of non-agricultural land	2007–2013
13.	226	Restoring forestry potential and introducing prevention actions	2007–2013
<b>Axis 3 - Quality of life in rural areas and diversification of the rural economy</b>			
14.	311	Diversification into non-agricultural activities	2007–2013
15.	312	Support for the creation and development of micro-enterprises	2007–2013
16.	313	Encouragement of tourism activities	2007–2013
17.	321	Basic services for the economy and rural population	2007–2013
18.	322	Village renewal and development	2007–2013
<b>Axis 4 – Leader</b>			
19.	41	Implementation of the local development strategies	2007–2013
20.	421	Interterritorial and transnational cooperation	2007–2013
21.	431–1	Running costs, acquisition of skills and animation – selected LAGs	2007–2013
	431–2	Running costs, acquisition of skills and animation – potential LAGs	2007–2009
<b>Other Measures</b>			
22.	511	Technical assistance	2007–2013
23.	611	Complements to direct payments	2007–2009

**Annex 2 – Table 25 of the RDP: measures to be implemented later**

Axis	Measure		Indicative implementation period	Indicative public expenditure (€)
<b>Axis 1 - Improving the competitiveness of the agricultural and forestry sector</b>				
1.	114	Use by farmers and forestry holders of advisory services (years 2010–2013)	2010–2013	36,146,000
2.	124	Cooperation for development of new products, processes and technologies in the agricultural and food sector	2009–2013	24,097,000
3.	125	Improving and developing infrastructure related to the development and adaptation of agriculture and forestry	2009–2013	90,365,000
4.	126	Restoring agricultural production potential damaged by natural disasters and introducing appropriate prevention actions	2009–2013	12,048,000
<b>Axis 2 - Improving the environment and the countryside</b>				
5.	213	Natura 2000 payments and payments linked to Directive 2000/60/EC (WFD) – agricultural land	2009–2013	108,835,000
6.	224	Natura 2000 payments – forests	2009–2013	15,548,000
<b>Axis 3 - Quality of life in rural areas and diversification of the rural economy</b>				
7.	341	Skills acquisition and animation with a view to preparing and implementing a local development strategy	2010–2013	61,437,000

### Annex 3 – Forest related measures in the Bulgarian RDP 2007-2013

Type of measure	Measure	Code	Axis	Objectives	Scope and actions	Beneficiaries	Funds allocated (€)
Commercial forestry	Improving the economic value of the forest	122	Axis 1	<ul style="list-style-type: none"> <li>• Improve fellings for seedling regeneration as well as continue lightening for establishing high productive forests</li> <li>• Improve the timber quality as well as timber quantity by appropriate silvicultural treatments (thinnings and pruning)</li> <li>• Support the modernisation of specific equipment needed for silvicultural activities as well as for producing and harvesting non-timber products</li> </ul>	<p><i>Scope:</i> Non-state forests on the whole territory of Bulgaria. The following forest territory will be excluded from support:</p> <ul style="list-style-type: none"> <li>• Forests and wooded land owned by the central or regional authorities (state owned), or firms owned by them</li> <li>• Forests owned by legal bodies more than 25 per cent of whose capital is owned by the above mentioned authorities</li> </ul> <p>All investments in forest holdings above 0.5 ha have to be based on a SFMP</p> <p><i>Actions:</i></p> <ol style="list-style-type: none"> <li>1. Creation of sustainable forest management plans and programmes for non-state-owned forests,</li> <li>2. Lightening and tending in coppice stands after fellings for natural seedling regeneration in stands which are between 1 and 10 years old – once during the period of the implementation of the programme.</li> <li>3. Pruning of coniferous plantations which are younger than 40 years</li> <li>4. Thinning in coniferous and deciduous forests which are younger than 40 years</li> <li>5. Purchase of suitable harvest equipment including: <ul style="list-style-type: none"> <li>• Harvesting equipment like harvesters, processors, motorsaws</li> <li>• Skidding equipment like forwarders, tractors, cable systems.</li> </ul> </li> </ol> <p>The following are not eligible for support:</p> <ul style="list-style-type: none"> <li>• Activities related to regeneration after final felling.</li> <li>• Regular forest management and maintenance activities.</li> </ul>	<ul style="list-style-type: none"> <li>• Private forest owners (natural persons or legal entities) and their associations;</li> <li>• Municipalities and their associations.</li> </ul>	<p><b>€ 24,097,340</b> <b>public expenditure</b> <b>(ca 0.74 per cent</b> <b>from the BG</b> <b>grand total public</b> <b>expenditure)</b></p> <p><b>€ 16,064,893</b> <b>private expenditure</b></p> <p><b>€ 40,162,233</b> <b>total cost</b></p>

Type of measure	Measure	Code	Axis	Objectives	Scope and actions	Beneficiaries	Funds allocated (€)
Commercial forestry	Adding Value to Agricultural and Forestry Products	123	Axis 1	<ul style="list-style-type: none"> <li>• Improvement of the overall performance, economic productivity and competitiveness of enterprises in the food processing and forest industry through: <ul style="list-style-type: none"> <li>– better use of production factors;</li> <li>– introduction of new products, processes and technologies,</li> <li>– improving quality and safety of foods and their traceability</li> </ul> </li> <li>• Achievement of compliance with Community standards</li> <li>• Improvement of environmental protection</li> </ul>	<p>1. Support will be provided for investments in tangible and intangible assets which:</p> <p>a. improve the overall performance of the enterprises</p> <p>b. concern:</p> <ul style="list-style-type: none"> <li>– processing and/or marketing of products covered by Annex I to the Treaty, except fishery products and of forestry products</li> <li>– and/or development of new products, processes and technologies for products covered by Annex I to the Treaty, except fishery products, and for forestry products</li> <li>– respect the Community standards applicable to the investment concerned</li> </ul> <p>2. Geographical scope of the measure – the whole country</p> <p>3. Specific conditions/exclusions:</p> <ul style="list-style-type: none"> <li>• Support shall be granted for investments for compliance with newly introduced Community standards for micro-enterprises only</li> <li>• Support for investments related to use of wood as a raw material shall be limited to all working operations prior to industrial processing</li> <li>• Support shall not be granted to enterprises in difficulty within the meaning of the Community guidelines on state aid for rescuing and restructuring firms in difficulty</li> <li>• Support is eligible only for construction/modernisation of private laboratories in the ownership of an enterprise, situated on the premises of the enterprise and used primarily for the enterprise's own products</li> <li>• Investments for production of energy from renewable energy sources are eligible if they concern the energy needs of the manufacturing enterprise, and/or the production of energy for sale through processing of plant and animal products from primary and secondary biomass, covered by Annex I to the Treaty</li> </ul> <p>All projects for bioenergy production for sale should include feasibility studies</p> <p>Where a Common Market Organisation, including direct support schemes financed by the European Agricultural Guarantee Fund (EAGF), places restrictions on production or limitations on Community support at the level of individual processing plants</p> <p>Where a project will result in an increase of production capacity the applicant under the measure should demonstrate the market potential for the output and the raw material availability</p> <p>Costs related to intangible investments for achieving compliance with internationally recognised standards are only eligible when they form part of a wider investment project, not as a stand-alone project</p> <p>Support for retail trade shall not be eligible</p>	<p>Eligible beneficiaries under this measure shall be:</p> <ul style="list-style-type: none"> <li>• Natural persons or legal entities registered under the Commercial Law or Law on Co-operations that are micro, small and medium-sized enterprises within the meaning of Commission Recommendation 2003/361/EC, including producer markets</li> <li>• Enterprises, which are not micro, small and medium but whose number of staff is less than 750 employees or annual turnover is less than €200 million</li> </ul>	<p><b>€ 240,973,396 public expenditure (ca 7.4 per cent from the BG grand total public expenditure)</b></p> <p><b>€ 294,523,040 private expenditure</b></p> <p><b>€ 535,496,436 total cost</b></p>

Type of measure	Measure	Code	Axis	Objectives	Scope and actions	Beneficiaries	Funds allocated (€)
Commercial forestry	Improving and developing infrastructure related to the development and adaptation of agriculture and forestry	125	Axis 1	No description in the RDP available Measure to start after 2009	No description in the RDP available	No description in the RDP available Recommendation 2003/361/EC, including producer markets • Enterprises, which are not micro, small and medium but whose number of staff is less than 750 employees or annual turnover is less than €200 million	<b>€ 90,365,000</b> <b>indicative public expenditure</b> <b>(ca 2.8 per cent from the BG grand total public expenditure)</b>  <b>The indicative budget of the measure is transferred to the budget of measure 'modernisation of agricultural holdings'</b>
	First afforestation of non-agricultural land	223	Axis 2	<ul style="list-style-type: none"> <li>Enhance the forest cover in order to contribute to climate change mitigation and to support natural biodiversity</li> <li>Diminish soil erosion and avoid land marginalisation</li> <li>Improve the water balance in the supported afforested and neighboring areas</li> </ul>	<p><i>Scope:</i></p> <p>Non-agricultural land on the whole territory of Bulgaria in:</p> <p>Areas belonging to municipalities with average forest cover less than 60 per cent</p> <p>Areas with high and medium risk of soil erosion according to national classification done by the Soil Resources Agency</p> <p>For the purpose of this measure non-agricultural lands include:</p> <p>Abandoned agricultural land – agricultural land which was not in agricultural use for at least three years preceding the application for support for afforestation</p> <p>Not afforested forest fund lands – lands located within forest areas that have never been afforested in the previous 15 years before the application for afforestation, but excluding environmentally valuable areas.</p> <p><i>Actions:</i></p> <p>1. Establishment actions include:</p> <p>a. Definition of a technological plan for afforestation;</p> <p>b. Site preparation for afforestation;</p> <p>c. Seeding and planting;</p> <p>d. Actions for guided natural succession;</p> <p>e. Fencing.</p> <p>2. Maintenance costs for:</p> <p>a. Repair seeding or repair planting;</p> <p>b. Tending in young afforested land up to five years after afforestation.</p>	a. Private owners (natural persons and legal entities) of non-agricultural land and their associations b. Municipalities and/or their associations – owners of non-agricultural land c. State forest holdings, state hunting holdings, national parks and Educational research forest holdings that manage state-owned forests	<b>€ 40,424,494</b> <b>public expenditure</b> <b>(ca 1.25 per cent from the BG grand total public expenditure)</b> <b>€ 7,133,734</b> <b>private expenditure</b> <b>€ 47,558,228</b> <b>total cost</b>

Type of measure	Measure	Code	Axis	Objectives	Scope and actions	Beneficiaries	Funds allocated (€)	
Commercial forestry	Restoring forestry potential and introducing prevention actions	226	Axis 2	Restoring forests damaged by forest fires, and other natural disasters  Improvement of prevention actions against forest fires	<p><i>Scope:</i> State, municipal, and private owned forest as follows:</p> <ul style="list-style-type: none"> <li>• Restoring actions are eligible on the whole territory of Bulgaria</li> <li>• Prevention actions are restricted to areas classified as high and medium forest fire risk.</li> </ul> <p><i>Actions:</i></p> <p>1. Restoring actions:</p> <p>a. Clearing of forests damaged by fires, windstorms and other natural disasters</p> <p>b. Reforestation of damaged forests using indigenous tree species</p> <p>c. Establishment and improvement of timber depots in case of disasters.</p> <p>2. Prevention actions:</p> <p>a. Establishing and improving of fire protection facilities – silvicultural breaks, fire precaution cuttings, mineralised strips etc.</p> <p>b. Purchasing of equipment for anti-fire depots</p> <p>c. Establishing and improving of landing places for helicopters</p> <p>d. Construction and improving of water points for fire-fighting</p> <p>e. Construction and improving of fixed fire monitoring points, purchasing of monitoring facilities and communication equipment</p> <p>f. Construction and improving of forest roads in areas with high fire risk</p> <p>g. Diversification of vegetation structure by transforming coniferous plantations into broadleaves or mixed stands.</p> <p>h. Maintenance costs will not be supported under this measure.</p> <p>i. The forest roads network and its development is a part of the Sustainable Forest Management Plan (SFMP) and the SFMP itself has Environmental Impact Assessment (EIA) and consultation process. For that reason construction and improving of forest roads foreseen in the SFMP will not need EIA. Any other construction of forest road should have EIA</p>	The eligible beneficiaries are:	<ul style="list-style-type: none"> <li>• private forest owners and their associations</li> <li>• municipalities and/or their associations – forest owners</li> <li>• state forest/hunting holdings, National parks and Educational research forest holdings.</li> </ul>	<p><b>€ 29,540,976 public expenditure (ca 0.91 per cent from the BG grand total public expenditure)</b></p> <p><b>€ 29,540,976 total cost</b></p>

Type of measure	Measure	Code	Axis	Objectives	Scope and actions	Beneficiaries	Funds allocated (€)
Commercial forestry	Support for the creation and development of micro-enterprises	312	Axis 3	<ul style="list-style-type: none"> <li>To promote growth and job creation in non-agricultural micro-companies in rural areas</li> <li>To promote entrepreneurship in rural areas</li> <li>To promote integrated rural tourism development</li> </ul>	<p>The measure will provide grant aid for investments and marketing and management advice for new and existing micro-enterprises.</p> <p>It will support non-agricultural micro-enterprises for investing in establishment or development of non-agricultural activities.</p> <p>The measure will be implemented in 231 rural municipalities.</p> <p>Support will be given to investments and related external marketing and management services to develop business activity in non-agricultural sectors such as:</p> <ul style="list-style-type: none"> <li><i>Processing industry</i> – furniture production, light engineering, etc.</li> <li><i>Renewable energy production:</i> <ul style="list-style-type: none"> <li>– production of bio-energy to meet the micro-enterprises own energy needs and/or</li> <li>– production of bio-energy for sale in case of processing products (raw materials) not covered by Annex I to the Treaty and/or</li> <li>– production of energy for sale from renewable energy sources (solar, wind, water, geothermal energy, etc.)</li> </ul> </li> </ul> <p>The capacity of the installations under this measure should not exceed 1 MW</p> <ul style="list-style-type: none"> <li><i>Services</i> – rural tourism initiatives by private enterprises, recreation and sports, setting-up or development of consultancy and business services, social and health care, transport services, etc</li> </ul>	<p>Newly established or existing micro-enterprises operating in non-agricultural sectors in rural municipalities.</p> <p>Micro enterprises are defined as enterprises which employ fewer than 10 persons and whose annual turnover and/or annual balance sheet total does not exceed EUR 2 million and complying with all requirements of the Commission Recommendation 2003/361/EC on the definition of SMEs</p>	<p><b>€ 127,261,669 public expenditure (ca 4 per cent from the BG grand total public expenditure)</b></p> <p><b>€ 54,540,715 private expenditure</b></p> <p><b>€ 181,802,384 total cost</b></p>
Environmental practices	Natura 2000 payments for forests		Axis 2	<p>No description in the RDP available</p> <p>Natura 2000 payments for forests depend on the formal designation of Natura 2000 sites and on the preparation of their management plans. Therefore this measure will be implemented after establishment and entry into force of clear restrictions on the agricultural and forestry activities either in the orders for designation of the sites or in their management plans which is expected to happen after 2009</p>	No description in the RDP available	No description in the RDP available	<p><b>€ 15,548,000 indicative public expenditure (ca 0.48 per cent from the BG grand total public expenditure)</b></p> <p>Till it starts, the budget of the measure is provisionally allocated to measure 'Agro-environmental payments'</p>

Type of measure	Measure	Code	Axis	Objectives	Scope and actions	Beneficiaries	Funds allocated (€)
Training and education	Training, information and diffusion of knowledge	111	Axis 1	The objective of the measure is to improve the human potential in the agricultural and forestry sectors through transfer of knowledge and perfection of skills. The operational objective is to ensure adequate levels of technical and economic knowledge and skills in management and business, new technologies, product quality and safety, sustainable management of the natural resources, including the requirements for the cross compliance, renewable energy sources and organic production	The measure provides assistance for training courses and information actions in agriculture and forestry to agricultural producers (registered under the Law on Support of Agricultural Producers) and forest owners as well as to those employed in their holdings	The organisations providing the training and information actions are the beneficiaries under the measure.  The participation of adults occupied in agriculture and forestry in the training courses and information actions is free of charge	<b>€ 102,413,694*</b> <b>public expenditure (ca 3.15 per cent from the BG grand total public expenditure)</b> <b>€ 102,413,694</b> <b>total cost</b>
	Use by farmers and forestry holders of advisory services (years 2010-2013)	114	Axis 1	No description in the RDP available  The implementation of the measure will start in 2010 and it will replace measure 'Provision of farm advisory and extension services in Bulgaria and Romania', which will be implemented in the first three years of the RDP in line with the provisions of Annex VIII to the Act of Accession of Bulgaria and Romania.	No description in the RDP available	No description in the RDP available	<b>€ 36,146,000</b> <b>Indicative public expenditure (ca 1.1 per cent from the BG grand total public expenditure)</b>  Till the start of the measure the indicative financial allocation for it is provisionally transferred to measure 'Training, information and diffusion of knowledge'

\* Including the indicative budget for the measure 'Use by farmers and forestry holders of advisory services' (years 2010-2013)

Type of measure	Measure	Code	Axis	Objectives	Scope and actions	Beneficiaries	Funds allocated (€)
Others	Implementation of the Local Development Strategies	41 (411, 412, 413)	Axis 4 (Leader)	<ul style="list-style-type: none"> <li>To provide a basis for medium and long term sustainable development in rural areas by implementing bottom-up approaches and to encourage 'learning by doing' within local communities increasing local planning capacity;</li> <li>To diversify the economic activities, improve competitiveness of local products, protect the environment of rural areas and develop higher-quality services catering to the needs and expectations of local people in order to create long term employment opportunities and to raise income levels in rural communities.</li> <li>To encourage integrated and sustainable practices.</li> </ul>	<p>The Leader approach will contribute to the achievement of the objectives of the National Strategy Plan for Rural Development and the priorities under axis 1 and 2 and in particular of axis 3 relating to development of a competitive and innovation based agriculture, forestry sector and food processing industry, protection of natural resources and environment of rural areas, and improving the quality of life and diversifying job opportunities in rural areas.</p> <p>To implement the local development strategies, Local Action Groups (LAGs) may apply measures under Council Regulation 1698/2005 selected in the RDP under Axis 1, Axis 2 and Axis 3 with the exception of measures in Axis 1 providing flat-rate aid in annual installments and measures from Axis 2 which are paid on an area basis. If operations supported under the local strategy correspond to an eligible operation under one of the measures defined in Council Regulation (EC) 1698/2005, the conditions for the measures defined in the Regulation apply. Where the measure is included in the RDP, the operations supported under the local development strategy will comply with the requirements on eligible type of activities, aid intensity and eligible types of beneficiaries, stated in the RDP measures (with the exception of the criteria for minimum and maximum size of projects).</p> <p>Other measures/actions outside the scope of the measures specified in Council Regulation 1698/2005 may also be supported, if they contribute to the objectives of the RDP and the local development strategies and aim at protection of the environment, rural landscape and local identity. The objectives and scope of such other measures, eligible applicants, actions and costs, aid intensities and criteria for selection of projects have to be presented in the Local Development Strategy and approved by the Managing authority.</p>	Local Action Groups (LAGs) registered under the Law on Non-Profit Legal Entities as an entity pursuing activities for public benefit, with a headquarters on the territory of the group	<p><b>€ 53,891,814 public expenditure (ca 1.67 per cent from the BG grand total public expenditure)</b></p> <p><b>€ 23,828,636 private expenditure</b></p> <p><b>€ 77,720,450 total cost</b></p>
	Interterritorial and transnational cooperation	421	Axis 4 (Leader)	<ul style="list-style-type: none"> <li>To support joint activities and projects (joint trainings, capacity development, sharing experiences and exchange of know-how);</li> <li>To support innovations in rural areas in products and services combining various rural backgrounds and to develop added value for rural areas;</li> <li>To support the setting up of an EU level identity in addition to the local, regional and national identity.</li> </ul>	<p>Two types of cooperation are eligible for funding within the scope of this measure:</p> <ul style="list-style-type: none"> <li>Inter-territorial cooperation - this type of cooperation is implemented, between two or more rural areas covered by Leader LAGs within Bulgaria.</li> <li>Trans-national cooperation - this type of cooperation can be between rural areas covered by Leader LAGs in Bulgaria and Leader LAGs in other Member States, as well as between rural areas covered by Leader LAGs in Bulgaria and similar structures in third countries. In this case, only expenditure relating to the rural areas covered within Bulgaria shall be eligible for support under this programme.</li> </ul>	LAGs selected by the Managing Authority	<p><b>€ 5,132,554 public expenditure (ca 0,16 per cent from the BG grand total public expenditure)</b></p> <p><b>€ 1,283,138 private expenditure</b></p> <p><b>€ 6,415,692 total cost</b></p>

## **Annex 4 – Strategic objectives and key measures of the Strategy Plan for Forest Sector Development 2007-2011**

The four strategic objectives of the SPFSD and the key measures to them are listed below.

1. *Economic stabilisation of the forest sector through improvement of its competitiveness and increase of the sustainable use of forest products and services*

Key measure 1: Restructuring and improvement of the state forest administration

Key measure 2: Improvement of the quality and the economic value of the forests and sustainable and rational timber use

Key measure 3: Support for research and technological development in order to increase the competitiveness of the forest sector

Key measure 4: Increase of the value of the non-timber forest products and services

Key measure 5: Encouragement of the cooperation between forest owners, branch organisations and associations for support to education and qualification in the field of silviculture

2. *Establishment and maintenance of viable forest ecosystems. Conservation and restoration of the natural biological and structural diversity, stable carbon storage and safeguarding of the forest ecological functions*

Key measure 6: Conservation and maintenance of the forest biological diversity

Key measure 7: Contribution to the UNFCCC and Kyoto Protocol implementation

Key measure 8: Improvement of the forest protection against disasters

3. *Life quality improvement through protection and enhancement of the social and cultural dimensions of the forest.*

Key measure 9: Encouragement of the ecological teaching and education

Key measure 10: Maintenance and improvement of the forest protective functions

Key measure 11: Utilisation of the forest potential in urbanised areas and around the cities

Key measure 12: Measures to enhance the social functions of the forests

4. *Improvement of the awareness, conformity and inter-sectoral cooperation*

Key measure 13: Development and implementation of national plan in accordance with the St Petersburg Declaration related to the Ministerial process on forest law enforcement and governance in Europe and North Asia

Key measure 14: Improvement of the sectoral and intersectoral cooperation and communication

Key measure 15: Enhancement of the participation of the state forest administration in the EU structures, and in international organisations and processes related to the forest sector

Key measure 16: Improvement of awareness and communication with the general public, with regard to the forest sector activities

## **ANNEX 5 – BSPB/BirdLife Bulgaria’s opinion with rationale for incorporation of forest-environment payments in the RDP**

(in Bulgarian)

### **БЪЛГАРСКО ДРУЖЕСТВО ЗА ЗАЩИТА НА ПТИЦИТЕ**

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**БДЗП**

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**Мирослава Георгиева  
Директор “Развитие на селските райони и инвестиции”  
МЗГ**

Относно: Мярка “Опазване на околната среда в горите” към НПРСР 2007-2013

Уважаеми г-н Йонов,

Приложено Ви изпращам Обосновка за необходимостта да бъде включена мярка “Опазване на околната среда в горите” или т.нар. горско-екологична мярка в разработваната Програма за развитието на селските райони, 2007-2013 г.

Както и досега, БДЗП изразява пълната си готовност да участва и подпомага работата на МЗГ в изготвянето на важните стратегически документи и програми, касаещи биоразнообразието и опазването на околната среда, произтичащи от присъединяването на страната ни към ЕС.

Надявам се, че приложената обосновка ще бъде полезна на Вашият екип при по-нататъшната му работа по ПРСР.

С уважение,

Борис Бъров,  
Изпълнителен директор

## ОБОСНОВКА

### за необходимостта от включване на Мярка „Опазване на околната среда в горите“ в Програмата за развитие на селските райони в България

Съгласно член 36 b (v) на Регламент No 1698/2005/EC от 20-ти септември 2005 за създаването на Европейски земеделски фонд за развитие на селските райони (EAFRD)

В унисон с целите на предложението за Национална горска стратегия на Р. България, с цел изпълнение на задълженията ни към ЕС за устойчиво развитие според стратегиите от Лисабон и Гьотеборг и по-специално спиране загубата на биоразнообразие до 2010 г.; и с цел даване на равни възможности на собствениците на гори да опазват и устойчиво да ползват горите си, като същевременно бъдат възмездявани за обществено полезните блага, които горите създават, Българското дружество за защита на птиците настоява за включване на мярката „Опазване на околната среда в горите“ в Програмата за развитие на селските райони със следните аргументи:

**1. Опазване на биоразнообразието в горите:** Горите в България са единственият тип природно местообитание, заемащо значителна площ от територията на страната. 36 per cent от тях попадат в предложените за НАТУРА 2000 места по Директивата за птиците, или т. нар. Орнитологично важни места (ОВМ). Директивата за птиците изисква прилагането на подходящи мерки за опазването на местообитанията на застрашените видове птици, включително и голям брой видове обитаващи горите.

Повечето видове птици в горите имат дисперсно разпространение, което означава, че не се концентрират на ограничени територии. По тази причина популациите на горските видове трудно могат да бъдат пълноценно обхванати от ОВМ/защитени зони. За тези видове, защитените зони/територии са най-често недостатъчни за поддържане на популациите им в дългосрочен план. От инвентаризация на биоразнообразието в горите при прилагане на стопанисване щадящо биоразнообразието в други европейски страни става ясно, че местата от НАТУРА2000 сами по себе си не са в състояние да осигурят благоприятен природозащитен статус на горските видове (Hanski, 2004).

*Наличието на подходящи хабитати на голяма територия е критично за оцеляването на мнозинството горски видове. За тази цел не само площта, но и качеството на местообитанията са от голямо значение. Следователно, за да се осигури оцеляването на популациите на горските видове в страната са необходими природозащитни мерки върху цялата горска територия. Прилагането на такива мерки ще допринесе за постигането на благоприятен природозащитен статус не само на птиците, но и на другите компоненти на биоразнообразието, и ще гарантира устойчивостта на горските екосистеми.*

**2. Справедливо заплащане на обществено полезни блага:** Основен принцип при формирането на Фонда за развитие на селските райони е заплащането за предоставените екосистемни услуги като биоразнообразие, кръговрат на водата, опазване на почвата, които не могат да бъдат обезпечени по друг начин, и в които горските екосистеми имат огромна роля. Тези услуги, въпреки че са от полза за цялото общество, не могат да бъдат продадени от стопаните по конвенционалните пазарни канали. Ето защо, Фондът позволява използването на публични средства за обществено полезни цели, каквато е и идеята зад създаването му.

Интегрирането на природозащитните мерки в различни фондове на Общността с цел опазване на биоразнообразието засега е единствения начин за обезпечаване изпълнението на тези мерки.

**3. Постигане на стратегически и политически цели:** Горско-екологичната мярка, както и мярката "НАТУРА 2000" са сред най-съвременните инструменти в Програмите за развитие на селските райони (ПРСР). Те са въведени в резултат на политическата решимост за достигане целта 2010 за спиране на загубата на биологичното разнообразие в ЕС. Според доклад на Европейската агенция за околна среда, интензивното горско стопанство през последните десетилетия доведе до значителен спад на популациите на видовете (ЕЕА 2004). Ново предложените горско-екологични мерки ще изиграят жизнено-важна роля за популяризиране устойчивото стопанисване на горите. **Фактът че са напълно нови за Общността означава, че ефективното им разработване изисква силна подкрепа от страна на институциите и не трябва да бъдат възприемани като непосилно предизвикателство.**

**4. Пълнота на прилагането на Европейското законодателство:** Според регламент 1698/2005 плащанията за непроизводствени инвестиции трябва да се отпускат и за изпълнение на ангажиментите по член 36 b (v) – т.е. за горско-екологични начинания. **Тъй като непроизводствените инвестиции са изключени от настоящата програма настояваме плащанията по горско-екологичната мярка да се запазят.** Включването на горско-екологичната мярка ще бъде в съответствие с препоръките на Плана за действие в горите, който беше одобрен от Комисията през юни 2006 г. (COM(2006) 302 final, 15.06.2006). В частта „Съхранение и подобряване на околната среда“, в една от поддейностите на ключова дейност 9 – „Подобряване опазването на околната среда“ се препоръчва популяризиране на доброволните мерки за опазване на околната среда, както и популяризиране на инвестициите, водещи до увеличаване на екологичната стойност на гората.

Дейностите по мярка "НАТУРА 2000 в горите" могат да бъдат подкрепяни също по горско-екологичната мярка на доброволен принцип. От опита в 25те страните членки на ЕС комбинацията от двата подхода често се използва за прилагане на изискванията по Директивата за местообитанията (92/43). По този начин може да се използват горско-екологичните дейности преди да са влезли в сила задълженията ни по тази директива. Последното ще отнеме значително повече време, отколкото одобряването на Програмата за развитие на селските райони и в този смисъл прилагането на мярката сега ще бъде решаващо за запазване качеството на местообитанията до включването им в мрежата НАТУРА 2000.

По препоръка на Европейската Комисия е по-добре усилията да се насочат към агро- и горско-екологичните мерки, а дейностите по НАТУРА 2000 да бъдат включени, когато местата са официално обявени и държавата определи бенефициентите, попадащи в НАТУРА 2000 мрежата. Така държавата ще може да подкрепи фермерите и горските стопани в прилагането на изискванията на Директивите и ще ги подготви за прилагането на дейностите по НАТУРА 2000.

**5. Насърчаване на устойчивото ползване на горите:** Според изследване във Финландия през 2005 г. 89 per cent от собствениците на гори биха желали да прилагат методи поддържащи биологичната стойност на гората ако получават компенсация за това или нямат загуба на доход. Около 1/5 са готови да го правят дори при загуба на доход. В България подобно изследване не е правено. Сред собствениците на гори липсва достатъчно информираност за стойността и ползите, които горите имат за обществото и за тях самите. С повишаване на познанията и информираността за собствениците на гори ще става все по-важно да запазят естествените, рекреационните и други стойности на горите си, несвързани с производство на дървесина, особено в контекста развитието на туризма.

**6. Създаване на допълнителни социални възможности за общините:** Делът на недържавни

собственици на гори се увеличава. Общините получават все по-голям дял от българската гора. По презумпция, общините са потенциални бенифициенти по програмата. Според член 42 на Регламента за развитие на селските райони частните собственици и общините както и техните асоциации са обект на подпомагане. Въвеждането на горско-екологична мярка в ПРСР ще даде възможност на общините да изпълняват проекти, свързани с развитието на селските райони и създаването на нови и разнообразни работни места за своите граждани.

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## ПРИЛОЖЕНИЕ

### Примерни горско-екологични мерки

Горско-екологичните плащания са за доброволни горско-стопански дейности, осъществявани като допълнение на задължителните добри горско-стопански практики. Горско-екологичната мярка ще се използва за възстановяване, поддържане и увеличаване на биоразнообразието в горите, опазване на горите с висока консервационна стойност и засилване защитните функции на горите – почвена ерозия, водно количество и качество и др. По аналогия с агро-екологичните мерки тези мерки могат да постигнат добро интегриране на стопанисването на горите с опазването на биоразнообразието.

При изпълнение на дейностите по горско-екологичната мярка, както и при НАТУРА 2000 не се разработва схема за всеки отделен вид. Още повече видовете, които могат да бъдат подпомогнати по тази мярка ще станат известни при проявата на добра воля от страна на стопанина да участва в програмата. Специфичната дейност ще зависи от набора от видове, за който тя се прави. Дейностите не се различават от тези по НАТУРА2000, единствената разлика е, че най-често горско-екологичните дейности се осъществяват извън НАТУРА2000 местата

Някои дейности предвидени за компенсиране по горско-екологичната мярка могат да бъдат.

Провеждане на изборна сеч – необходимост от чести интервенции с малка интензивност, което повишава разходите по ползването

Плащания за възобновяване на гори със смесен състав ако се окаже по-скъпо/ трудоемко от създаването на култури от един дървесен вид

Компенсиране на по-бавния растеж на дървесни видове, предпочитани от природозащитна гледна точка

Компенсиране на по-лошо качество на дървесина на дървесни видове, предпочитани от птиците

и прилепите.

Не отсичането на дървета в "буферни" зони около гнезда на определени видове – компенсиране загубата на доход от неотсечената дървесина

Пълна забрана на сечта на определена територия - компенсиране загубата на доход от неотсечената дървесина

Увеличаване турнуса на сеч – компенсиране на пропуснатата полза.

Непровеждане на окончателната фаза на главните сечи– компенсиране на пропуснатата полза.

Ограничен обществен достъп до буферни зони на гнезда (по време на гнездовия сезон) – плащания за поставяне на информационни табели, загаждания.

Ограничено изграждане на горски пътища – компенсиране на разходите за използване на обходни такива.

Поставяне на загаждания на малка площ от горската територия с цел улесняване възпроизвеждането на уязвими видове – разходите за самото изграждане.

Запазване на стари, гниеци хралупати дървета

Разнообразяване структурата и състава на гората – ако са необходими допълнителни инвестиции за постигането на тази структура

Премахване на екзотични дървесни видове – подпомагане дейностите по премахването им