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Support to High-Nature-Value Farming in Bulgaria: Compliance with the no backsliding principle?

Bulgaria has lost around 40% of its High Nature Value farmlands since 2007. Rather than having an in-depth analysis of the reasons behind this negative trend, the Ministry of Agriculture proposed deletion of all existing support in breach of the 'no backsliding principle' for the CAP Strategic plans.

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CAP Strategic Plan in Bulgaria: State of Play

In March 2021, Bulgaria has already presented a significant part of the proposed interventions under its future CAP Strategic Plan. The documents sent to the members of the official Thematic working group on CAP 2021-2027 are also posted on the [specific webpage of the Ministry of Agriculture](#), so that all interested stakeholders can submit their comments, proposals or other positions.

The [Society for Territorial and Environmental Prosperity](#) (STEP) is not a member of this working group. We did initially submit individual positions (on the environmental SWOT and on the needs assessment). After the official set up of the working group, we have been collaborating with the representatives of the environmental NGOs in the working group to coordinate and streamline our proposals and comments.

After one year in the public consultation process on the new CAP Strategic Plan in Bulgaria, we observe a worrying trend: the designing process is open for comments, however, it lacks transparency on the follow up and final decisions about the proposals – who makes them, what justification, when, and so on.

Another significant gap that we observe is the missing link between the SWOT, the needs assessment, the proposed interventions and the requirement for “no backsliding”. This is especially the case in the field of biodiversity in agricultural land, for example for support to High Nature Value (HNV) farmlands and landscape features on agricultural land. Here below we present our in-depth analysis and five specific recommendations to increase the level of ambition in the support to HNV farming in Bulgaria.

State of biodiversity on agricultural land – High Nature Value farmland

The SWOT analysis accompanying the CAP Strategic Plan in Bulgaria identified this country as one of the Member States with the highest loss of HNV farmland in the EU. Unfortunately, it digs no further to analyse the reasons behind the loss, the types of HNV farmland that suffers most, or the effects of the current CAP interventions on it.

In 2020, we undertook an assessment of the change of HNV farmland based on LPIS¹ data (to be published). By 2019, HNV farmland in Bulgaria has decreased by almost 40% compared to its initial designation in 2007. The decrease is highest for the permanent grasslands – from 950 000 ha to barely 440 000 ha in 2019. This is a substantial loss of valuable habitats of plant and animal species, as well as of open and/or mosaic landscapes and their deriving ecosystem services.

The other serious decline is in the mixed land use category (mosaic landscape), which has decreased from 280 000 ha to 170 000 ha. At the same time, a large part of the HNV farmland of 2007, which was still eligible for support in 2019, has undergone a transformation of the land use and now nearly 66% of it is registered as arable land. Both trends were inevitably accompanied by loss and/or deterioration of the quantity and quality of linear features and mosaic landscapes.

Despite the facts about the status of HNV farmland and the requirement for respecting the ‘no backsliding’ principle, as well as the Commission recommendation for ‘urgent attention’ to farmland biodiversity (Commission Staff Working Document, SWD 2020 369 final/ 18.12.2020), the proposed agri-environment-climate interventions presented in the draft CAP Strategic Plan in Bulgaria lack a specific support focused on HNV farmland (see Box 1). As things stands, this is a step backward since

¹ LPIS – Land Parcel Identification System

the new strategic plan might not include the agri-environment-climate schemes for HNV farming as it was implemented in the two programming periods (2007-2013 and 2014-2020) since Bulgaria's accession.

Box 1 Proposed schemes for the Agri-Environment-Climate measure in the draft CAP Strategic Plan in Bulgaria

New schemes:

- Sustainable soil management practices
- Promoting the use of crops and varieties suitable for growing in specific climatic conditions
- Integrated production of plants and plant products and sustainable management of plant protection products
- Conversion of arable land into permanent grassland
- Protection of bee colonies and ensuring diverse grazing
- Creation of multifunctional vegetative (buffer) strips with specific vegetation - in arable lands and around perennial crops and vegetables
- Sustainable management of landscape elements

Existing schemes

- Conservation of endangered native breeds (indigenous) and plant varieties important for agriculture
- Traditional grazing practices

Source: <https://www.mzh.government.bg/bg/obsha-selskostopanska-politika-2021-2027-g/tematichna-rabotna-grupa/>

Key needs for restoration, improvement and maintenance of biodiversity in agricultural lands

In the context of preparing the future CAP Strategic Plan in Bulgaria, our organisation identified three key needs for achieving CAP Specific Objective 6 'Contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes':

- 1. Preservation and restoration of the scope and quality of High Nature Value farmland.**
- 2. Preservation and restoration of landscape features in agricultural land with a view to achieving efficient and connected green infrastructure in rural areas.**
- 3. Preservation, restoration and increasing the conservation status of habitats and species in the agricultural land within the scope of the European ecological network Natura 2000.**

To achieve these needs, we put forward specific recommendations for CAP interventions in the following areas:

- (1) Adaptation of the national definition of permanent pastures and of their eligibility for support under CAP schemes and measures so as to reflect the regional characteristics of pastures and meadows in our country (exceeds the existing commitments).**

The direct translation and adoption of the definition of permanent pastures set in the EU Regulation, without using the opportunity for its adaptation in line with the national and local characteristics, is

causing significant loss of important fodder areas for stock breeders with grazing animals. It is also causing loss of habitats of conservation significance within the European ecological network Natura 2000. The change of definition from the '50 tree rule' to '100 tree rule' in 2014, brought some 400 000 ha of permanent pastures in the LPIS eligible layer. There are still some 500 000 ha which are reported by national agriculture statistics but are not in the LPIS.

Possible approaches for adapting the definition and, accordingly, their eligibility for support, can be based on:

- a. Their location and characteristics in mountainous or in plain areas;
- b. The classification in the Bulgarian Survey for Monitoring the Agricultural and Economic Conjuncture (Agrostatistics definitions) to permanent productive meadows, alpine pastures, low productivity grasslands and meadows-orchards.
- c. The habitat type in accordance with the Habitats Directive (Council Directive 92/43/EEC).

(2) Support for permanent grasslands under CAP Pillar I according to their natural characteristics and consistent with the services they provide for protection of biodiversity (exceeds the existing commitments).

Permanent grassland is the only type of land use which can offer economic opportunities for farmers adopting sustainable practices (e.g. extensive grazing), and simultaneously contribute to the protection of biodiversity and for the reduction of the farm's carbon footprint, in line with the requirements of the EU Biodiversity Strategy 2030. The higher environmental quality of permanent grasslands needs to be adequately recognised by the agricultural policymakers.

A targeted eco-scheme is needed to support the sustainable management of permanent grasslands. It is recommended that the support is stepwise and relevant to the environmental services:

- Basic payment level for permanent grasslands with up to 10% landscape features and elements.
- Level 1 with bonus payment for permanent grasslands with 10.01% - 15% landscape features and elements.
- Level 2 with higher bonus payment for permanent grasslands with 15.01% - 20% landscape features and elements.
- Level 3 with highest bonus payment for permanent grasslands with 20.01% - 25% landscape features and elements.

(3) Support for permanent grasslands of High Nature Value through the agri-environmental measure under CAP Pillar II (continuation of existing commitments).

Preserve the schemes 'Restoration and maintenance of High Nature Value grasslands', 'Traditional practices for seasonal grazing of animals (pastoralism)' and 'Conservation of endangered local breeds' and introduce monitoring of their environmental and land use effects.

Considering the results of the assessment of change in scope of High Nature Value farmland of 2019 against 2007, it is mandatory to carry out a new assessment of their scope and quality at the start of the programming period in order to ensure that the targeted agri-environment-climate schemes are aimed precisely at grasslands, not at areas with changed land use.

(4) Introduction of (pilot) result-based agri-environmental schemes (exceeds the existing commitments).

Bulgaria is one of the few Member States without result-based agri-environmental schemes, even at pilot level. The result-based schemes offer farmers the flexibility to use their knowledge and land management experience in a way that brings ecological results (e.g. biodiversity, carbon storage, regulation of water reserves, etc.) alongside their agricultural activity. They can be particularly beneficial for improving the conservation status of habitats and landscapes in Natura 2000 sites, especially when adding to the compensatory payments for the restrictions in the use of agricultural land.

(5) Preservation of the mosaic landscape in the few remaining areas with high share of mixed land use by introducing a targeted agri-environmental scheme (exceeds the existing commitments).

The collective application of this scheme would be much more effective and beneficial in terms of preserving the mosaic landscape on a larger scale and should therefore be encouraged. It requires the development of a joint plan for preservation and development of the mosaic landscape, which determines the commitments of each individual farm, the recommended types of land use and landscape elements. Since Bulgaria lacks experience in the implementation of collective agri-environment-climate schemes, it is recommended to test them at a pilot level in areas with high share of land with mixed land use and with typical/ traditional landscapes.

Final remarks

When we first formulated the key needs and the specific interventions for achieving the Specific Objective 6 related to Biodiversity in the CAP Strategic Plan, we had not even imagined that the Ministry of Agriculture would cancel all existing support for HNV farmlands – this does not make sense in the context of the “no backsliding” principle.

In early 2021, we have been eager to see which of our new proposals were taken on board given the lack of communication and feedback on the submitted positions. This has been a disappointment and the complete neglect of the partnership principle.

The only HNV relevant scheme in the whole bucket of environmental interventions was an eco-scheme for permanent pastures grazed for 60 days with grazing density of 0.3 -1 LU/ha. This is a good idea in principle, but not when it is the only one, and there is no other information about its implementation.

Initially, the livestock breeding associations were pleased with the new eco-scheme. A month later, in February 2021, 16 livestock farmers associations submitted a joint position to the ministers of agriculture and environment requesting the return of the HNV grasslands agri-environment scheme and re-assessment of their territorial scope in LPIS, as well as an eco-scheme for permanent pastures with layered payment based on the presence of landscape features. We see some of our proposed interventions reflected in their position, thus the pressure to have support to HNV farmlands in the CAP Strategic plan for Bulgaria is not limited to environmental NGOs only.

Whether the situation becomes a ‘return back to the existing commitments’ or ‘exceed the existing commitments’ (higher ambition) remains to be seen in the coming months. The fact is that the current proposal of the Ministry of Agriculture is in direct breach of the ‘no backsliding principle’ in terms of the support to HNV farmlands.