Short version of STEP's position on the official draft of the BG CAP Strategic Plan

Overall findings

- There are some improvements in the Bulgarian CAP Strategic plan over the last 6 months – the return of the High Nature Value farming support agri-environmental measure as well as the increased budget for Organic farming throughout the SP. However, they are not sufficient at all to respect even the minimum requirements of the CAP SP Regulation, notably article 105.
- Public participation proved to be a pro-forma exercise. Numerous positions of various organisations (environmental, nature conservation, livestock breeding, fruits & vegetables, etc.) were submitted, their opinions were not reflected in any of the draft versions without any reasoning on pro's and con's of the proposals.
- Mouthful of priorities listed (over 70) but the majority are not supported by adequate instruments, target areas/actions and allocated budgets.
- Very low ambition regarding nature and biodiversity in agriculture and rural areas in terms of stated priorities, objectives, schemes/measures, target areas and budgets.
- Negative discrimination of permanent pastures vis-à-vis arable land in terms of schemes/measures, definitions, payment levels and budget allocation, e.g.
- Over-focus of eco-schemes on arable land with a targeted coverage of 114% of the available arable lands in the country (BANCIK 2020);
- Under-focus of eco-schemes on permanent pastures with a targeted coverage of only 27% of the available permanent pastures in the country (BANCIK 2020).

Major weaknesses

Art.105 "No backsliding principle" not respected at all for nature and biodiversity: There is less budget for the Natura 2000 measure with significantly reduced target areas for the new period while the number of the Natura 2000 sites eligible for support have more than doubled with the sites under the Habitat Directive. The budget for the HNV agri-environmental measure remained unchanged.

The definition of permanent pastures was not changed to reflect their national and regional characteristics. The opportunities in the CAP SP Regulation were not used. This approach discriminates over 500 000 ha of permanent pastures and makes them ineligible for CAP support.

At the same time, the lack of eligible grazing areas creates tension in the livestock grazing sector. Continuous lack of any monitoring of the environmental and climate effects of the CAP funding in Bulgaria. The proposed CAP SP is not even considering developing such a monitoring system despite the numerous recommendations from the former and most recent ex-ante evaluations of the RDP/CAP SP in Bulgaria.