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GREEN CONDITIONALITY AND ECO-SCHEMES IN THE CAP STRATEGIC PLAN OF BULGARIA

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Abstract

Bulgaria's CAP Strategic Plan for developing agriculture and rural areas for 2023 – 2027 is implemented for the first year by farmers, with the campaign for submitting support applications ending in July 2023. The purpose of the present study is to investigate whether Bulgarian grain producers encounter challenges regarding the compliance and implementation of the "green architecture" within the framework of direct payments under the Strategic Plan. In this regard, the possibilities of the grain producers in terms of compliance with the mandatory standards for the good agricultural and ecological condition of the land, as well as the farmers' attitude to participate in one-year voluntary eco-schemes, were investigated. The survey results show that the most significant difficulties for grain producers are registered in compliance with standards for minimum soil cover to avoid bare soil in periods and areas that are most sensitive and for a minimum share of arable land devoted to non-productive areas and features. Surprisingly, the survey shows significant interest in grain producers' participation in an eco-scheme to reduce the use of pesticides. The worrying results of the research are that amongst the country's producers of grain and oil crops, farmers who did not apply for support under the basic scheme have been identified. Also, part of the grain producers would refuse to participate in support under the European funds because of the increased environmental requirements. Moreover, cereal producers who would give up agricultural activity if the environmental requirements for farmers are further increased have also been identified.

Keywords: CAP Strategic Plan, green architecture, green conditionality, GAECs, eco-schemes, grain producers

INTRODUCTION

With the publication in 2019 of the EC Communication on the European Green Deal and in 2020 of the EU Biodiversity Strategy 2030 and the Farm to Fork Strategy, respectively, it appears that the path forward for the European agriculture and agri-food chain is clearly drawn. It will firmly and ambitiously follow the line of "greening and more greening". This is also the path followed by the EC in all its next steps in terms of legislative initiatives and policies. The ambitious objectives of the Biodiversity and Farm to Fork strategies are directly reflected in Regulation 2021/2115 for establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans), in the Proposal for a Regulation on the sustainable use of plant protection products, in the Nature Restoration Law and other normative and sub-normative European acts. However, it should be emphasised that the ambitious policies of the Green Deal and related strategies were written in times when the COVID-19 pandemic and Russia's war with Ukraine did not exist as factors that could seriously disturb food security and the food supply chains of the old continent.

Obviously, the first year of implementing the new rules to support farmers will be complex and adaptive, as has been the start of every new program period of the Common

Agricultural Policy (CAP) so far. Once again, the adaptability and flexibility of agricultural holdings to new and increasing requirements related to environmental protection and the fight against climate change are being tested. Too many issues come up on the agenda. Will the farmers be able to meet the new, more ambitious environmental rules and requirements this time, and to what extent are they ready to limit their agricultural production before finally giving up farming? Isn't the European Commission (EC) pursuing a policy of double standards? On the one hand, the EC puts a lot of pressure on the agricultural producers working on the territory of the Union, who should comply with high environmental requirements for environmental protection and for dealing with negative climate changes. On the other hand, the EC gives a competitive advantage to third-country farmers and third-country agricultural products that do not comply with the same ecological and quality standards, either through bilateral trade agreements or through regulations liberalising trade with certain countries.

Bulgaria's CAP Strategic Plan is one of the last plans submitted for discussion and approval to the EC (it was submitted at the end of November 2022). The EC approved the National Strategic Plan in December 2022. The severe delay in the finalisation and submission of the Strategic Plan reasonably has led to subsequent delays in the publication of all national normative acts concerning the implementation of the Plan. In addition, the National Strategic Plan is heavily loaded with a total of 72 interventions in the form of direct payments and the form of investments in rural areas. The rules for all these interventions are further complicated by the newly introduced increased conditionality within the standards for good agricultural and ecological conditions of the land (GAECs) and the statutory management requirements (SMRs). Logically, during the campaign for the submission of aid applications, numerous problems and obstacles have been identified in the administration of a large part of the interventions (51) and mandatory requirements, such as GAEC 6 (regarding the calculation of plots with slopes), problems with the eco-scheme for preservation and restoration of the soil potential (regarding the Plan for nutrient management in the soil), the claiming of elements which are part of the layer with ecological infrastructure, the observance of the buffer strips according to the GAEC 4 (considering the outdated layer "Hydrographic net"), etc. The agroecological and organic production interventions have become possible for application only ten days before the end of the claiming campaign due to a severe delay in the publication of the relevant national regulations on the conditions and procedures for implementing the interventions. After several extensions of the campaign's deadline for receiving aid applications, in connection with the many new rules and interventions under the CAP Strategic Plan, the support claiming process ends on July 21, 2023.

The present study aims to establish whether Bulgarian grain producers face difficulties in complying with the mandatory standards for the good agricultural and ecological condition of the land, as well as to register the interest of grain producers in participating in voluntary commitments under schemes for climate, environment and animal welfare, the so-called eco-schemes, included in the CAP Strategic Plan.

MATERIALS AND METHODS

The research is conducted through a survey among more than 120 farmers – members of the National Grain Producers Association (NGPA), carried out in July – August 2023. The period for conducting the survey has been chosen in connection with the completion of the first annual campaign on the claiming of the areas for support and the submission of the relevant aid applications within the new program period of the Common Agricultural Policy 2023 – 2027. Groups of

grain producers from all regions of the country with strategic importance for producing grain and oil crops are covered, namely the South Central Region, Southeast Region, Northeast Region, North Central Region and Northwest Region. Over two-thirds of the surveyed grain producers cultivate areas from 100 to 1000 ha, and their farms were established more than five years ago. So, it could be said that the tested farms are more or less stable, market-oriented and possess previous experience and history.

Various methods are applied in the research, such as descriptive analysis of the CAP Strategic Plan of Bulgaria, as well as an expert method based on the analysis of the abundant documentation provided by the European Commission for both the Green Deal and the CAP and on the analysis of reactions, statements and reports from national and European authorities, stakeholders and farmers' organisations. The research methods are complemented by the statistical methods of calculations on the extracted data from the conducted farmers' survey, such as analysis of variance and correlation analysis.

This publication is part of the author's wider doctoral research on the sustainability of Bulgarian grain production in the context of the European Green Deal.

RESULTS AND DISCUSSION

The CAP reform proposal contributes to the EU's environmental, climate, and biodiversity protection commitments set in the European Green Deal through the so-called "green architecture" that includes enhanced conditionality, which links CAP payments to a range of obligations; the new "eco-schemes" that aim to reward farmers for going further in the implementation of sustainable agricultural practices; and environmental and climate management commitments under the rural development framework, which aim to compensate farmers and other beneficiaries for voluntarily committing themselves to implement sustainable practices. Based on a thorough assessment of the local conditions and needs, Member States produce a national CAP strategic plan that must be coherent and consistent with the required environmental ambition. (EC, *Analysis of links*, 2020).

It is necessary to emphasise that Bulgarian grain producers traditionally maintain a high ecological level of production and technology. Through the survey, agricultural practices applied by grain producers in the country, favourable for the climate and the environment, which until now have not been subject to national or European funding, but are instead a sign of the good agricultural culture of Bulgarian farmers, are investigated. Almost 95% of the survey respondents apply crop rotation on their farms. More than 50% of the respondents are grain producers who apply balanced fertilization. Also, more than 50% of the survey participants state that they apply precision agriculture in their production technology (Figure 1).

Since May 2022, for more than half a year, several information campaigns have been carried out by the National Grain Producers Association (NGPA) and the Ministry of Agriculture and Food (MAF) among farmers regarding the new rules and support interventions within the CAP Strategic Plan. Information events in various regional centres to cover the country's entire territory have been organised. In addition, several manuals, instructions and explanatory videos have been published by the Ministry of Agriculture and Food (MAF) and the State Fund „Agriculture" to improve the preparedness of farmers to apply for interventions and submit support applications. Nevertheless, the survey results outline that nearly 53% of the questioned grain producers from the NGPA need additional information and clarifications regarding implementing the mandatory standards GAECs. Also, nearly 60% of the respondents indicate a need for additional information and clarification regarding climate, environment and animal welfare schemes, the so-called eco-schemes.

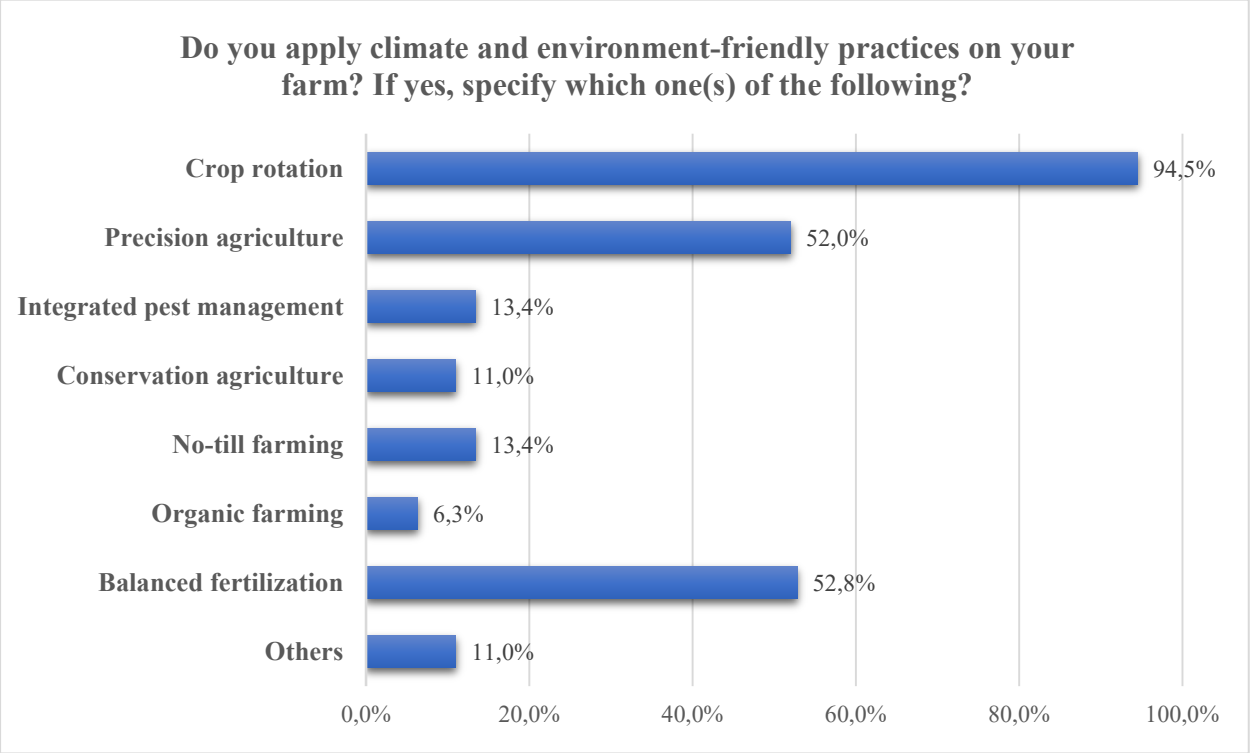

Fig. 1. Implementation of climate and environment-friendly agricultural practices among the surveyed grain producers.
Source: Own calculations based on a conducted survey

Good agricultural and environmental condition standards (GAECs)

Several good agricultural and environmental condition standards (GAECs) and statutory management requirements (SMRs), included in the Strategic Plan as part of the enhanced conditionality, concern Bulgaria's arable crops and grain production. These are GAEC 2: Protection of wetland and peatland; GAEC 3: Ban on burning arable stubble, except for plant health reasons; GAEC 4: Establishment of buffer strips along water courses; GAEC 5: Tillage management, reducing the risk of soil degradation and erosion, including consideration of the slope gradient; GAEC 6: Minimum soil cover to avoid bare soils in period(s) that are most sensitive; GAEC 7: Crop rotation in arable land except for crops grown under water; GAEC 8: Minimum share of arable land devoted to non-productive areas and features; SMR 1: Directive 2000/60/EC in the field of water policy, regards mandatory requirements to control diffuse sources of pollution by phosphates; SMR 2: Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources; SMR 7: Regulation (EC) No 1107/2009 concerning the placing of plant protection products on the market; SMR 8: Directive 2009/128/EC establishing a framework for Community action to achieve the sustainable use of pesticides (EU, Regulation 2021/2115).

The conducted research explicitly indicates the difficulties faced by farmers regarding compliance with the mandatory standards GAEC 6: Minimum soil cover to avoid bare soils in period(s) that are most sensitive and GAEC 8: Minimum share of arable land devoted to non-productive areas and features (Figure 2).

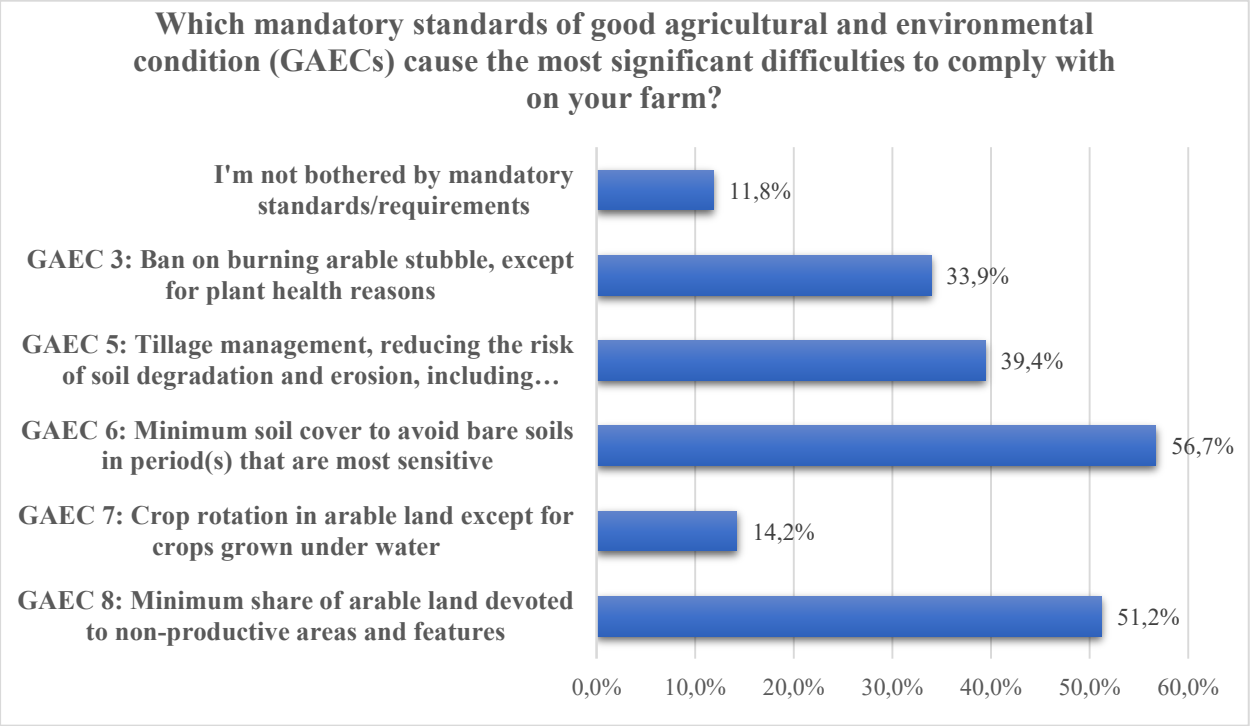

Fig. 2. Difficulties faced by grain producers regarding compliance with individual mandatory standards (GAECs).
Source: Own calculations based on a conducted survey

Nearly 57% of the surveyed grain producers report the most significant difficulties in fulfilling GAEC 6's requirement to provide soil cover during sensitive periods. The Strategic Plan states that in agricultural holding, it is mandatory to maintain a minimum soil cover of a minimum of 80% of the entire arable area of the holding during the sensitive period (01 June to 31 October). In addition, in agricultural holding, for areas with a slope ≥10%, during the period from 01 November to 15 February, it is mandatory to maintain a minimum soil cover of a minimum of 80% of the entire cultivated area of the holding. (MAF, 2023. Approved Strategic Plan).

Farmers from certain parts of the country, such as the regions of South-Central Bulgaria and South-Eastern Bulgaria, report a very significant problem in the implementation of the mandatory requirement to maintain a minimum soil cover of at least 80% of the entire cultivated area of the farm during the sensitive period from June 1 until October 31. Due to the soil-climatic characteristics of these regions, the possibilities for growing crops are very limited and agricultural holdings hardly manage to combine and rotate cereal and oil crops in the cultivated areas. Most of these farms rely on the rotation of wheat/barley with canola due to the impossibility of growing maise and sunflower. Typically on these farms, the wheat/barley to canola crop ratio is approximately 50:50. Under similar conditions, compliance with the requirement for a minimum of 80% soil cover during the period 01.06. – 31.10. cannot be achieved. There is a window of approximately two months after the wheat is harvested until the canola is sown, during which no minimum ground cover can be provided – no plant residues, stubble or mulch can be left as the areas are being prepared for autumn sowing. Cover crops cannot be sown, as they will not germinate and form a soil cover due to the dry weather and the lack of soil moisture during the summer months.

In addition, the requirements under GAEC 6 prevent the implementation of

traditional agricultural practices in the country related to the implementation of deep ploughing, which is a proven means of increasing soil fertility. Deep ploughing has a multifaceted meaning – it is the most potent means of fighting weeds; it ensures the storage of soil with more moisture from autumn, winter and spring precipitation; it facilitates the introduction of organic and mineral fertilisers; it contributes to the destruction of many diseases and plant enemies. The bans and restrictions imposed by Europe in the last ten years regarding the use of adequate instruments to combat insects have led to the expansion of the distribution area and an increase in the density of economically essential insects. One of the most effective ways to fight against insects is to plough them mechanically into a certain development cycle.

The Ministry of Agriculture and Food is preparing an analysis for the first year of implementation of Bulgaria's CAP Strategic Plan. The purpose of the analysis is to propose changes in the conditions and requirements under the GAECs, under the eco-schemes, as well as under other interventions from the Strategic Plan, where imperfections and contradictions, weak interest on the part of the beneficiaries or, on the contrary, surprisingly high interest on the part of the beneficiaries have been identified. The currently valid text of the GAEC 6 is the requirement that is in the most significant contradiction with the country's soil and climatic conditions and the application of traditional agricultural practices. The agricultural community considers the change in the conditions under the mandatory standard for maintaining minimum soil cover as imperative.

Additional difficulties and production limitations are also caused by the mandatory standard GAEC 8: Minimum share of arable land devoted to non-productive areas and features, which is indicated by over 51% of respondents as challenging to implement. In the "Manual for practical application of the conditions for maintaining the land in good agricultural and ecological condition in Bulgaria", it is stated that a farm with arable land ≥ 10 ha must set aside and maintain at least 4% of the arable land at the level of the agricultural holding, intended for non-production areas and objects (landscape features), including land lying fallow (MAF, 2023). The fulfilment of the mandatory requirement to maintain non-productive areas, known in the previous program period as a voluntary green practice for maintaining "ecological focus area", is achieved by the Bulgarian grain producers primarily by keeping fallow land. In this way, Bulgarian farmers fail to generate income from production in these areas and register losses from the specific plots for which they pay an annual rent to cultivate the agricultural land. The allocation of 4% of non-production areas is a limiting requirement for fulfilling the farm's agricultural production potential. It leads to a noticeable reduction in the production area at the European level. The reduction of production potential and the threat to the state of food security in Europe due to the COVID-19 pandemic and the Russian military aggression against Ukraine are the reasons why the European Commission has reconsidered some of the restrictive green requirements. In connection with this, in 2022 and 2023, and it is expected that this will also happen in 2024, the EC applies a derogation from the mandatory leaving of non-productive areas and allows the sowing of land lying fallow with crops suitable for human consumption.

Schemes for the climate, the environment and animal welfare – eco-schemes

A total of eight schemes for the climate, the environment and animal welfare (eco-schemes) are included in the CAP Strategic Plan of Bulgaria within the framework of direct payments. Four of the eco-schemes provide a potential opportunity for traditional grain-producing farms in the country to implement a voluntary one-year environmental practice, and

these are eco-scheme for maintaining and improving biological diversity and ecological infrastructure; eco-scheme for preservation and restoration of soil potential – promotion of green manure and organic fertilization; eco-scheme to reduce the use of pesticides; and eco-scheme for diversification of cultivated crops. In the frame of the survey conducted among the grain producers from the NGPA, the highest interest has been registered in applying for an eco-scheme for reducing the use of pesticides – nearly 80% of the respondents, and an eco-scheme for diversifying the cultivated crops – nearly 60% of the respondents, as well as for the eco-scheme for preservation and restoration of soil potential – promotion of green manure and organic fertilization – nearly 50% of respondents (Figure 3).

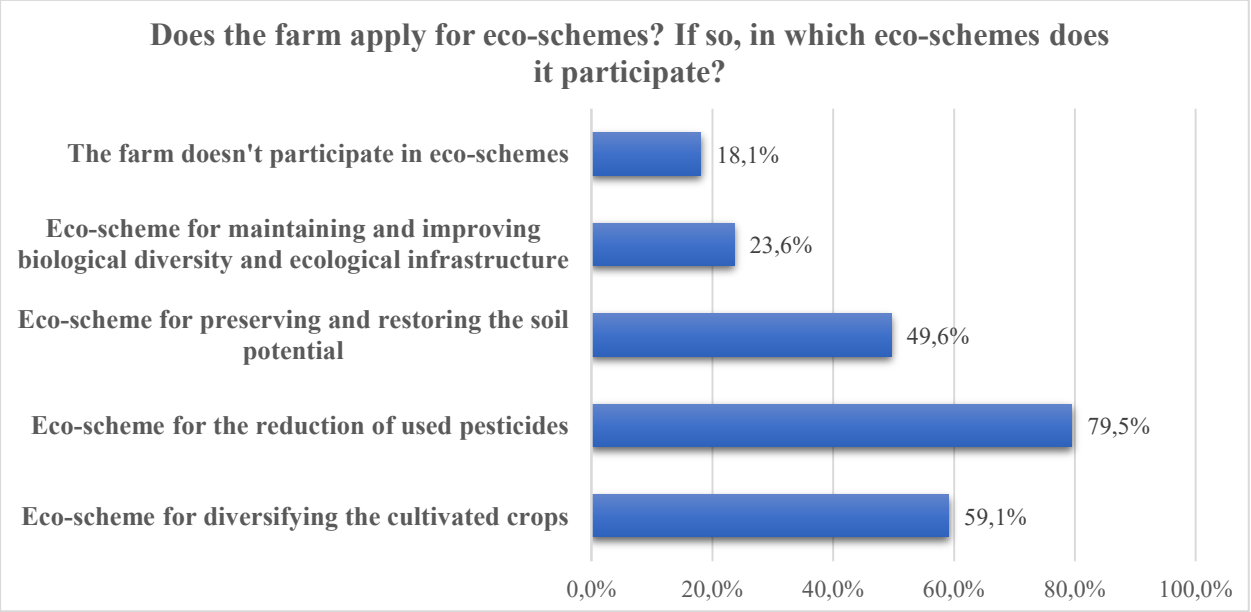

Fig. 3. Participation of grain producers in voluntary eco-schemes.
Source: Own calculations based on a conducted survey

The interest in the eco-scheme for diversifying the cultivated crops is expected, and the size of the requested area approaches as percentages of the estimated hectares set in the Strategic Plan (according to the Ministry of Agriculture and Food, there is approximately 87% implementation of the eco-scheme). The ecological practice generally involves growing at least four crops on holdings with arable land over 30 ha, with the main crop occupying no more than 75% of the arable area and the three main crops together covering no more than 90% of the arable land.

The interest of agricultural producers in participating in the eco-scheme for the reduction of used pesticides is surprising, according to which 460% implementation of the estimated values recorded in hectares in the Strategic Plan is observed (according to the MAF). The requirements under the eco-scheme include mandatory not applying plant protection products that are total herbicides, including those containing glyphosate, as well as fulfilling one of two additional conditions, which are: application of plant protection products insecticides, herbicides and fungicides not falling into the first professional category of use; or applying pheromone traps with different densities per hectare when growing field crops (cereal, oilseed, technical, etc.).

Almost 283% of the implementation of the estimated values in hectares laid down in the Strategic Plan concerning the application under the eco-scheme for preserving and restoring the soil potential – promotion of green manure and organic fertilization, have

been registered. The eco-scheme broadly covers two environmental practices that can be applied for 1) Input of nutrients to the soil through the cultivation of non-productive catch crops/cover crops with subsequent green manuring and 2) Input of nutrients to the soil through the use of external organic soil improvers. It should be noted that it is also the eco-scheme that generates a great deal of discussion and questions, mainly concerning the preparation of the Soil Nutrient Management Plan, which is part of the requirements under the eco-scheme.

The willingness of Bulgarian grain producers to participate in voluntary eco-schemes and green measures should be emphasised and once more encouraged. However, the ambitious aims of the Green Deal to reduce the use of pesticides and fertilizers arouse serious concerns and worries regarding farmers' competitiveness. Every second of the surveyed farmers indicated that reducing the use of plant protection products by 35% of the amounts traditionally used in conventional production would lead to reductions in yields of up to 30%. Nearly 60% of the surveyed grain producers indicated the same losses in yields if fertilisers were reduced by 20% of the amounts traditionally used in conventional production.

Finally, the Green Deal impact assessment studies, published by external organisations, outline a strong reduction in cereals and oilseeds production in the EU, serious negative effects on European trade, decreased farmers' income and an eventual increase in consumer prices (Shukadarova, 2022). To examine the prospective market and food security impacts of the EC proposal United States Department of Agriculture (USDA) focuses on several selected agricultural input reductions specified in the Green Deal's Strategies: reduction of pesticide use by 50%, reduction of fertilizer use by 20% and removal of 10% of existing farmland from agricultural use. In the EU-only scenario (which assumes the EU alone implements the Strategies and trade is permitted normally): gross farm income in the EU falls by 16%; wheat production in the EU drops by 48.5%, cereal grains by 20%, and oilseeds by 60.7% (Beckman et al., 2020). In addition, the Joint Research Center (JRC) technical report presents a modelled scenario which includes a reduction of the risk and use of pesticides, a reduction of nutrient surplus, an increase of area under organic farming and an increase of area for high-diversity landscape features. According to the JRC report, cereals supply in Europe drops by 13% and oilseeds supply by 12% (Barreiro-Hurle et al., 2021).

The Green Deal is also expected to significantly impact Bulgarian production and areas with the main cereal and oilseed crops, which will be felt more tangibly eventually towards the middle of the decade (Popov et al., 2021). Sustainability is one of the most important priorities for European and Bulgarian agriculture, and one of the mandatory elements of sustainability is competitiveness. It is almost impossible without economic competitiveness to have viability and ecological and social stability in the Agri sector (Popov et al., 2022).

CONCLUSION

Expectedly, at the beginning of each new program period of the Common Agricultural Policy, numerous difficulties are registered related to the campaign for submission of aid applications by farmers and by the state administration in connection with introducing new interventions and support rules. This statement applies to a very large extent to the first year of implementing Bulgaria's CAP Strategic Plan. Let's hope that the period of adaptation and adjustment to the new rules will pass quickly from next year as well the process of applying for support and complying with the new rules will go more smoothly.

Grain producers in Bulgaria have a traditionally high culture and knowledge of

agricultural activity and voluntarily apply practices favourable to the environment and the climate, the most widespread of which are crop rotation, balanced fertilization and precision agriculture. Of the mandatory standards for the good agricultural and ecological condition of the land, the most significant difficulties among grain producers in Bulgaria expectedly are caused by GAEC 6: Minimum soil cover to avoid bare soils in period(s) that are most sensitive. This GAEC 6 will be proposed for change in the procedure prepared by Bulgaria for changes to the Strategic Plan, which should be presented to the EC in September 2023. The other mandatory standard strongly limiting agricultural activity is GAEC 8: Minimum share of arable land devoted to non-productive areas and features. Contrary to initial expectations, significant interest on the part of Bulgarian grain producers is observed in the eco-scheme for reducing the use of pesticides, as well as in the eco-scheme for preservation and restoration of soil potential. Commonly expected, the eco-scheme for crop diversification is also registered to be quite popular among cereal farmers in the country.

Farmers in Bulgaria are inclined towards greening practices as long as there are rational economic incentives and compensations for this, and they do not drastically reduce production. However, worrisome findings from the conducted survey have been found, which show that not a tiny part of the grain producers (more than 20% of the research participants) have the attitude of refusing participation and financial support for the interventions of the Strategic Plan, due to the increased environmental requirements for farmers. Some respondents did not apply for the 2023 campaign under the Basic Income Support for Sustainability intervention (the previous Single Area Payment scheme) part of the CAP Strategic Plan. Disturbing is also the determined attitude of some of the surveyed grain producers to give up agricultural activity if environmental requirements and restrictions increase even more and are mandatory for farmers to comply with, regardless of whether they participate in financial support from European funds.

Bulgarian grain producers' competitiveness is decreasing due to the increased environmental requirements introduced in the CAP Strategic Plan. Their competitiveness is further worsened by the collapse of markets and existing unfair competition due to the EU's prioritisation of third-country agricultural production. The registered inequality between European and Ukrainian producers threatens the foundations of European agriculture, food system and food security.

The increase in environmental standards and green requirements should happen smoothly, without drastic and sudden changes. Also, these environmental standards and requirements should apply equal force to producing all agricultural products offered on European markets, regardless of their origin. In this sense, a complete rethinking of the established European policy of "greening" of agricultural production and the agri-food chain is necessary to ensure a rational and reasonable balance between achieving ecological ambitions and providing food security for Europe and third countries in need.

In the last few years, the agricultural sector worldwide has been subjected to extremely dynamic and intensive processes caused by the negative consequences of climate change, the COVID-19 pandemic and the war between Russia and Ukraine. These processes significantly impact global food stocks and distribution, leading to market shocks and frequent price fluctuations. All these factors require further analysis and research, both on the implementation of the CAP during the current program period and on the effects of the implementation of the legislative initiatives related to the objectives of the Green Deal. In-depth and continuous analyses of the ongoing and planned policies in the European agri-food chain are critically needed to reflect the real state of the sector and

prevent catastrophes and crises related to food security. Comprehensive socio-economic, environmental, and climate analyses will also serve for the preparation and adequate planning of proposals for the reform of the Common Agricultural Policy for the next program period, 2028 – 2034.

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