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*European Forum  
on Nature Conservation  
and Pastoralism*

# **High Nature Value farmlands: Recognising the importance of South East European landscapes**

## **CASE STUDY REPORT Rusenski Lom (Bulgaria)**



WWF-DCP/EFNCP, 2008

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Recognising the importance of South East European landscapes**

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Rusenski Lom (Bulgaria)

This report is produced as part of collaboration between the European Forum on Nature Conservation and Pastoralism (EFNCP) and WWF Danube-Carpathian Programme (WWF-DCP). Both organisations recognise the importance of certain farming systems for nature conservation. Between 2006 and 2008 a project was executed aiming at finding out at a local scale where agriculture overlaps with areas of High Nature Value in order to understand better the relation between both. The project consisted of six local workshops, three each in Bulgaria (Strandzha, Rusenski Lom and Western Stara Planina) and Romania (Sibiu, Mehedin i and Gala i), and a reporting seminar in Brussels. After concentrating on the ecological aspects, the workshops analysed the socio-economical needs of local farmers and identified where policy can be improved. In this way the project linked the developing concept of High Nature Value farming to the reality of farming and considered the practicalities of implementing the EU commitments on identifying and supporting HNV farming in different local situations. All findings were reported to relevant bodies from local to European level.

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Prepared by:

Koen De Rijck, WWF Danube-Carpathian Programme  
Yanka Kazakova, WWF Danube-Carpathian Programme  
Maya Todorova, WWF Danube-Carpathian Programme Bulgaria

With input from:

Guy Beaufoy, European Forum on Nature Conservation and Pastoralism  
Gwyn Jones, European Forum on Nature Conservation and Pastoralism  
Rosen Tsonev, Biological Department - Sofia University "Sveti Kliment Ohridski"  
Emilia Christova, Municipal Service for Agriculture and Food - Ivanovo

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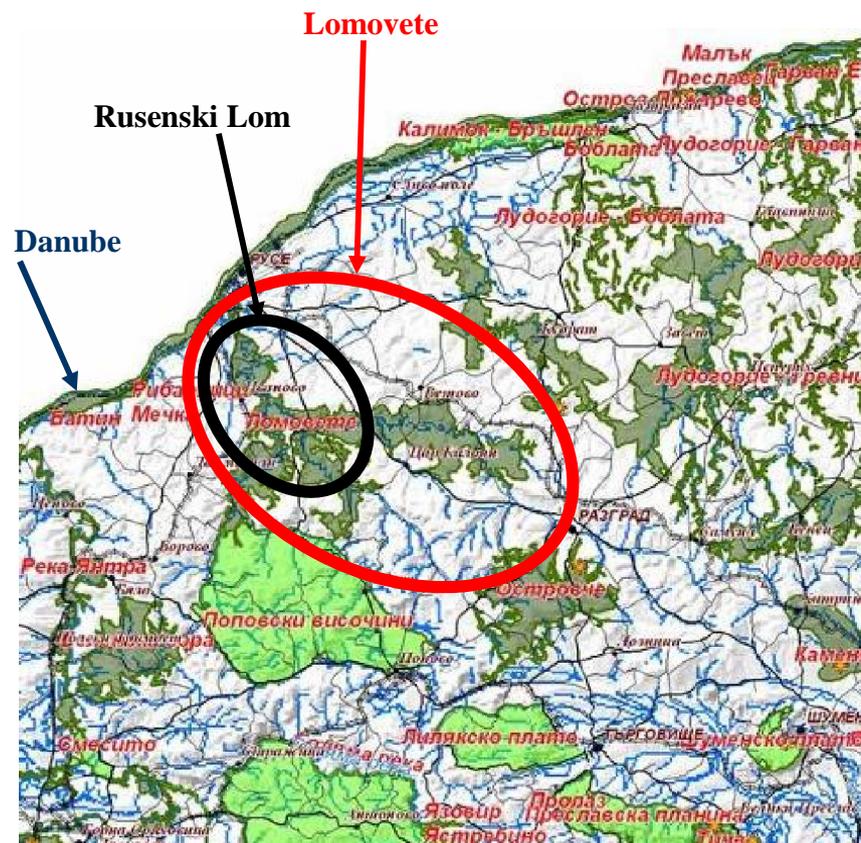
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## I. INTRODUCTION

Rusenski Lom region is located in the northeast of Bulgaria, in the canyon-like valley of the Rusenski Lom River, the last major right tributary of the Danube before it spills into the Black Sea. Rusenski Lom is a protected area covering territories from Vetovo, Ivanovo and Tsar Kaloyan municipalities (administrative level LAU 0).

The area comprises forests and High Nature Value farmland set in a wider landscape of large-scale intensive arable farming. The three Lom Rivers (Lomovete) form a stunning landscape of limestone canyons, with a mixture of wet grasslands in the valleys and dry habitats with semi-natural vegetation on the cliffs, hills and flat plateaus.

Rusenski Lom also contains a breathtaking range of historical cultural sites such as churches and monasteries built into the rocks, monks' caves and an ancient city. The place is a UNESCO World Heritage Site.



Map 1: Rusenski Lom and Lomovete Natura 2000 site

## II. NATURE VALUES

The dramatic landscape, the unique biodiversity and the rich cultural heritage were the main reasons to declare Rusenski Lom as a protected area in 1970 and in 2002 it got the status of Nature Park, covering an area of 3408ha. This is only a small part of the area of actual Lomovete, however an extension of the site to around 10 000ha is currently under discussion. The Nature Park and its wider area is a Natura 2000 site under the EU Habitat Directive (32 489ha), and overlapping with it a site under the Bird Directive (3408ha).

Rusenki Lom Nature Park together with the wider area of Lomovete harbours a rich variety of habitats: meandering rivers, small natural lakes and fishponds, riverside terraces with wet hay meadows, alluvial forests, high vertical rocks, dry semi-natural grasslands, rocky steppe grasslands, dry mosaics of grassland and bushes and oak forests on dry and rocky soils among others. Many of these habitats are of high nature conservation importance and as such are identified and classified according the EU Habitat Directive (see Table 1).

The variety of habitats and climate conditions contributes to a high flora and fauna diversity. The flora in the park counts 877 species (23% of Bulgaria’s flora) including 30 Balkan and 1 Bulgarian endemic species. Nine species of the Orchid family can be found in the Park.



Picture 1: Siberian Calf-breeder (*Polygala sibirica*), a new species in the Bulgarian flora, can be found on grasslands with steppe characteristics



Picture 2: European Ground Squirrel, also called European Souslik, is an attractive inhabitant of dry semi-natural grasslands and an EU priority species

Rusenski Lom is one of the top places for nesting birds in Bulgaria, and 122 (of a total of 174) bird species breed in the Park. Some of the birds are endangered in Europe and are under Bulgarian and EU protection. However, here protection is not incompatible with human activities. Many of the species occur in open, semi-natural areas and are dependent upon certain low-intensity farming practices for their survival: Long-legged Buzzard (*Buteo rufinus*), Lesser Spotted Eagle (*Aquila pomarina*), Egyptian Vulture (*Neophron percnopterus*), Common Quail (*Coturnix coturnix*), Woodlark (*Lullula arborea*), Corncrake, (*Crex crex*) and Red-backed Shrike (*Lanius collurio*).

Reptiles also are very well represented (19 species), as are fish species in the Lom Rivers. About 70 mammal species find their home in the Park, and more than half of them are protected under Bulgarian laws or Europe-wide conventions. Particularly interesting is the presence of 25 bat species dwelling in caves and old-growth forests. Some of the most attractive inhabitants of dryer grasslands are European Souslik (*Spermophilus citellus*), Marbled Polecat (*Vormela peregusna*) and Steppe Polecat (*Mustela eversmanii*), all species of Community interest according the EU Habitat Directive.

Table 1: Some of the farmed semi-natural habitats of Lomovete, classified according the EU Habitat Directive

No.	Habitat	Distribution	Interaction with farming
6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco Brometalia)	Rocky steppes on the canyon sides and margins (important orchid sites)	Grazing is not regulated and planned but light grazing (0,6-0,7 LU/ha*) is necessary to maintain the habitat. The number of animals should be limited within the norms provided below. Overgrazing and trampling

			by animals is a threat.
6240	Sub-continental steppic grasslands	Dry semi-natural grasslands on richer loess heights and uplands	Low-intensity grazing (0,6-0,7 LU/ha) required to maintain the grassland habitat. Most of these areas are undergrazed at the moment, thus natural succession to woodland takes place.
6250	Pannonian loess steppes	Dry semi-natural grasslands on poorer loess heights and uplands The biggest deposit of the Bulgarian endemic species <i>Chamaecytisys kovacevii</i> Rothm. and of the Balkan endemic species <i>Verbascum dieckianum</i>	Livestock is not threat to these two endemic species and grazing is required to maintain the steppic characteristics. Main threats are overgrazing by livestock close to Krassen and Basarbovo; burning of dry grass on the pastures in the beginning of spring; and dissemination of aggressive weed species from the adjoining farmlands
6510	Lowland hay meadows	Meadows of the canyon floors along Lom rivers	Grazing at certain stocking densities (more or less 1 LU/ha) is required to maintain this rich habitat. Mowing is recommended as a management practice to remove the surplus of nutrients, brought in by the river. Trampling of vegetation by animals on their way to the grasslands as well as overgrazing close to settlements is a threat to the habitat.
40A0	Subcontinental peri-Pannonic scrub	Bushy grasslands or open woodlands on the canyon margins near villages in Basarbovo and Bozhitchen regions	Since it neighbours arable lands, a real threat is their conversion to arable lands, burning of stubble-fields and inflow of nutrients from the arable fields. A large part of this habitat is already destroyed due to these reasons. Grazing by goats should not be allowed.
91E0	Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> ( <i>Alno-Padion</i> , <i>Alnion incanae</i> , <i>Salicion albae</i> )	Small vegetable gardens and tree crop mosaics near villages in the canyon floor	Forests under the strong influence of human activities: gardening and harvesting.

\* LU/ha: livestock unit per hectare. 1 LU equals about 1 cow or 1 horse or 7-9 sheep or 7-9 goats.

The management plan of the Rusenski Lom Nature Park recommends the following practices on the farmlands:

- § Mowing of meadows, as well as the removal of overgrown bushes and forest plantation to be done after June 15;
- § Hay-making should be done from the centre to the edges of the field in order to protect bird species;
- § Restoration of converted meadows should be made through re-seeding, harrowing and regular mowing taking into account the pace of grass growth;
- § Sustainable farming practices on arable land including crop-rotation, limited use of fertilizers, mechanical and biological removal of weeds, disease, use of animal traction.

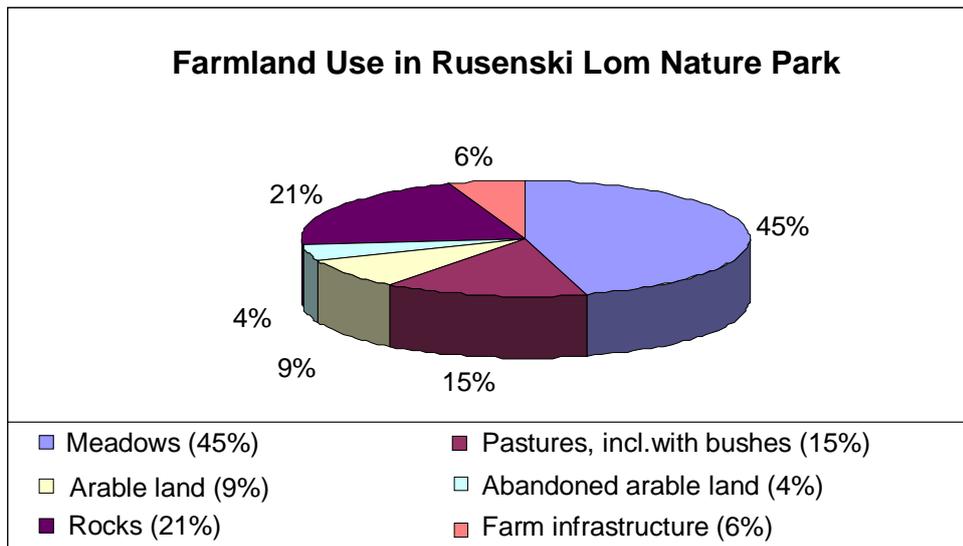
The management plan of Rusenski Lom Nature Park does not provide recommendations or restrictions on stocking densities, but the administration plans to include it in the current

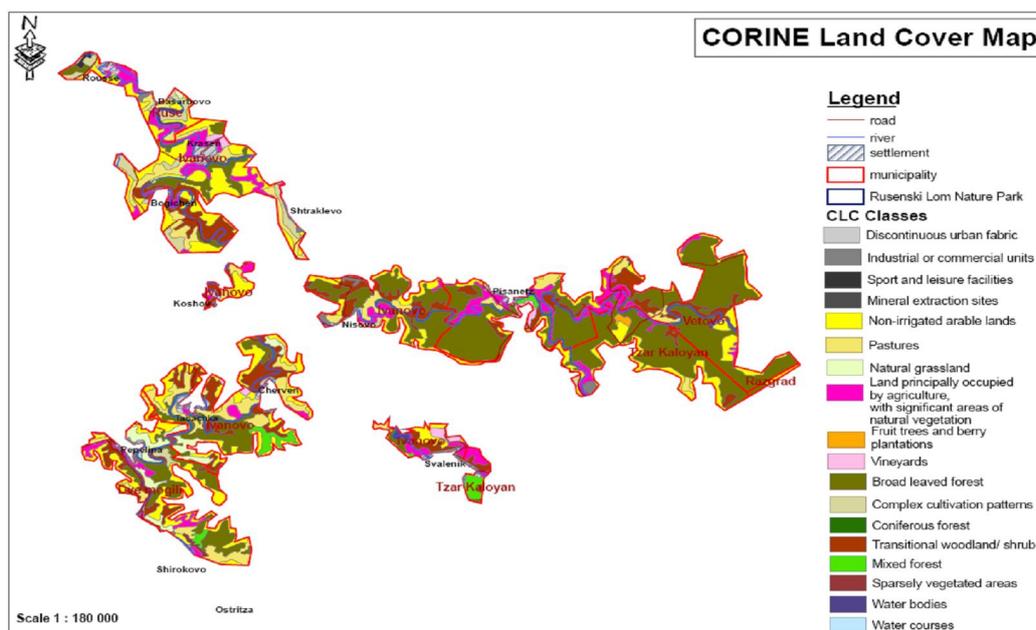
revision of the plan. At the moment there is not sufficient data on the carrying capacity of the grasslands in the park. GAEC provides restrictions for all farmland in Bulgaria: maximum 2 adult cows or horses or 20 sheep or goats per hectare. This means about 2 livestock units per hectare; however these restrictions are not motivated by nature conservation objectives. For a good management of High Nature Value farmlands, lower stocking densities are advised at a maximum level of 1 LU/ha. Less productive, dry grasslands (6210, 6240; see table 1) might need grazing at lower densities: up to 0.6-0.7 LU/ha. A follow-up study should give better insights in the interaction between grazing densities and high nature values in the different grassland habitats in the Nature Park.

### III. LAND USE IN RUSENSKI LOM REGION

The region is dominated by intensive arable land use which surrounds the territory of the Nature park. The land use in the three municipalities comprises 92% arable land (54 700 ha), 4097 ha semi-natural grasslands, and perennial plants. Meadows represent the highest share in all grasslands, followed by common pastures and pastures with shrub-formations, rocks and some abandoned arable lands.

Forests are the main land cover (2808 ha or 82%) in the Nature Park, followed by farmlands. Farmland is an interesting mixture of grasslands and extensively used arable lands.





Map 2: CORINE land cover map for the extended park territory (Source: WWF DCP Bulgaria 2007)

In terms of ownership, lands within the Rusenski Lom NP are mostly state-owned and municipal. Private lands have a small share, comprising only 287,6 ha out of the total 3408 ha. Land belonging to the municipalities<sup>1</sup> is mainly agricultural. The distribution of ownership by dominating land-use types is as follows:

Table 2: Land ownership in Rusenski Lom

Land ownership	Forests (ha)	Agriculture land (ha)
Exclusively state	68.7	20.0
State	2450.9	66.9
Municipal	203.4	200.3
Private	53.8	233.8
Religious organizations	2.1	-
Schools	28.6	-
Others	-	3.2
<i>Total</i>	<i>2807.5</i>	<i>524.2</i>

In contrast, private lands comprise more than 60% outside Rusenski Lom Nature Park. There are also large areas owned by the municipalities, mainly meadows and pastures, which according to new legislation should be leased to farmers without charge.

Most of the arable lands are used by big tenants and cooperatives. There are also some land investment funds which are buying up arable lands in recent years to consolidate larger parcels of land.

The climatic conditions, relief and the large share of agricultural lands on the territory of the 3 municipalities define agriculture as the leading economic activity in the area. Natural conditions favour the cultivation of cereals and industrial crops. The main crops cultivated are wheat, maize, barley and sunflower. Unlike farming within the case study area, practices are intensive, including the use of pesticides, fertilisers and nitrates.

<sup>1</sup> Some of them included in the park – mainly forests, meadow and pastures

The production of fodder and the availability of well-developed fodder is a condition for developing large-scale animal breeding. Poultry breeding is the most developed in the municipalities, followed by sheep and goat herding. Cattle-breeding is concentrated in Vetovo and Tzar Kaloyan municipalities.

Table 3: Number of animals kept (2007)

<i>Municipality</i>	<i>Cattle</i>	<i>Pigs</i>	<i>Sheep</i>	<i>Goats</i>	<i>Poultry</i>	<i>Bees</i>
Tzar Kaloyan	1107	808	1850	1530	18870	3543
Ivanovo	1730	3620	3670	2230	47435	6073
Vetovo	2230	1510	8100	2050	24500	5539

Farm animals are mostly kept in households. Keeping of 1-2 cattle or several small farm animals is typical for the area. There are just a few farms keeping more than 20 cattle and few of them have good welfare conditions according to the new requirements for sufficient space per animal and hygiene conditions.

The number of cattle has decreased from 2005, even though statistics show different trends. The reason is that more animal-breeders are becoming registered (see Table 4). At the same time, pushed by the new regulations and tough requirements, and the increase in forage prices, small farms sell their animals. This trend leads to the concentration of animals (especially cattle) in few larger farms.

Table 4: Registered agriculture producers

<i>Municipality</i>	<i>2005</i>	<i>2006</i>	<i>2007</i>
Tzar Kaloyan	161	190	184
Ivanovo	337	363	390
Vetovo	292	411	480

Forestry is the other economic activity in the region. However, since the majority of the forests are state-owned the operations are carried out by the local forestry units.

Collection of non-timber forest products like herbs, fruits and mushrooms is not provided for in the management plan of the Park and thus if there is any activity going on it is not registered.

Tourism (eco-, agri- and rural) are all forms of alternative activities that are developing in the region.

#### **IV. HIGH NATURE VALUE FARMLANDS**

The farmlands of high nature value in Rusenski Lom region can be broadly classified in HNV Type 1 and Type 2.

##### **1) HNV Type 1: Semi-natural vegetation**

###### *- Meadows of the canyon floors*

Over the years many, if not most, of these have lost their floristic diversity through manuring and nutrient inputs from floods. Some important semi-natural grasslands do remain, e.g along

Cherni Lom and Malki Lom rivers, falling into the Habitats Directive Lowland Hay Meadows biotope. The main interest of these areas from a conservation point of view is for individual fauna species such as butterfly species and birds like Corncrake (*Crex crex*), a world-threatened bird of rich grasslands.

The main threat to these areas comes from the abandonment of the mowing practices, as well as overgrazing. While the lack of mowing is becoming a wide-spread issue in Rusenski Lom, the overgrazing of meadows is quite localized. However, where it happens it is seriously destructive.

- *Semi-natural grasslands*

These occur mainly on the canyon sides and margins. Most widespread are dry semi-natural grasslands on loess heights and uplands, but there are also significant rocky steppes, and surviving grasslands on the black-earth soils of the flat lands above the canyons. Lastly, there are significant areas of transitional habitats – bushy grasslands or open woodlands, depending on the point of view – on the canyon margins. They are recognized as the most valuable farmlands with occurrence of several endemic plant species. Significant fauna of the semi-natural grasslands include Spur-thighed and Hermann’s Tortoises (*Testudo graeca iberia* and *T. hermanni*) and the European Souslik (*Spermophilus citellus*).

The issue of overgrazing of pastures and some of the rocky steppes is a serious one. On the other hand there are pastures located a day’s walk away from the villages for the movement of the animals, which are becoming more and more overgrown with bushes and other vegetation. This leads to a decrease in the Souslik population.

A moderate grazing density of 0.6-0.7 LU/ha is recommended for the Park territory. The decline of small scale grazing practices and the concentration of animals in larger farms leads to formation of woody and bush vegetation and to an overall decrease of the pasture area.

Table 5: Recommended grazing density in the park

Areas in Nature Park	Cattle (1)	Sheep (2)	Mixed grazing (1+2)
121,1 ha	80	484	40 + 242
495,1 ha	330	1980	165 +990



Picture 3: Canyon of Rusenski Lom, seen from the edge of the cliff near Orlova Chuka. Meadows along the river and bushy, dry semi-natural grasslands on the canyon margins (left upper corner) are some of the most important HNV farmlands in the area. On the horizon are large, intensively-managed arable lands.



Picture 4: Meadows on the canyon floors along Cherni Lom River, and rocky pastures on the canyon side (right upper corner)

In both cases the conversion of grasslands to arable land is a critical threat which is very difficult to control, even though it is officially illegal.

## 2) HNV Type 2: Small-scale mosaics of arable lands and orchards

On the canyon floors in the Nature Park, the small vegetable cultivation and tree crop mosaics next to the villages, while floristically poor, are significant for species such as Red-backed Shrike (*Lanius collurio*) and Nightingale (*Luscinia megarhynchos*).



Picture 5: Vegetable cultivation between village of Cherven and Cherni Lom River, a typical example of HNV Type 2 in Rusenski Lom Nature Park.



Picture 6: Red-backed Shrike (*Lanius collurio*)

The arable lands on the flat, fertile land on the plateaus is in the form of large intensively-managed fields of little nature value. On the contrary, they are causing a problem to the neighbouring HNV grasslands through their farming practices. Even though forbidden by law, farmers continue the practice of burning stubble fields leading to the destruction of the humus and loss of animal/plant species.

## V. CASE STUDY FARMS

Three farms were visited during the workshop in Rusenski Lom in October 2007.

### A. Farm of Chakar brothers, village of Ezerche, Tzar Kaloyan municipality

The enterprise combines a dairy farm and a dairy processing unit. It was opened in the last year and is an example of the cattle farm concentration happening in the region. There are 52 dairy cows and 3 calves on the farm most of which were bought from small owners giving up livestock keeping.

The farm has only 1 ha of land, and thus the animals are kept entirely indoors with some small exceptions: there is a small yard outside the building where they are allowed for walking once a day.

Both the farm and the processing unit meet the EU hygiene requirements. Their entire milk production is processed in the dairy for cheese production. Additionally they buy milk from

other small-scale producers in the region to meet the production capacity of the processing unit.

The enterprise is a good model for meeting all EU requirements. Unfortunately, this production unit has no connection to the maintenance of the HNV grasslands in the region. One possible exception is the milk bought from others – which may come from the ‘old-fashioned’ grazing system.



Picture 7: A modern cowshed with systems to pump milk to the tank and to remove manure to the storage

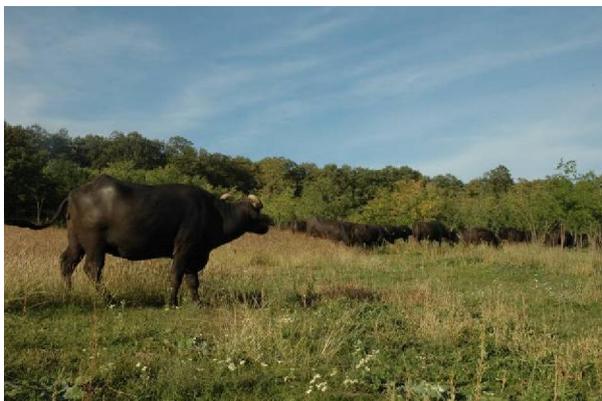


Picture 8: One hectare of grassland just outside the cowshed

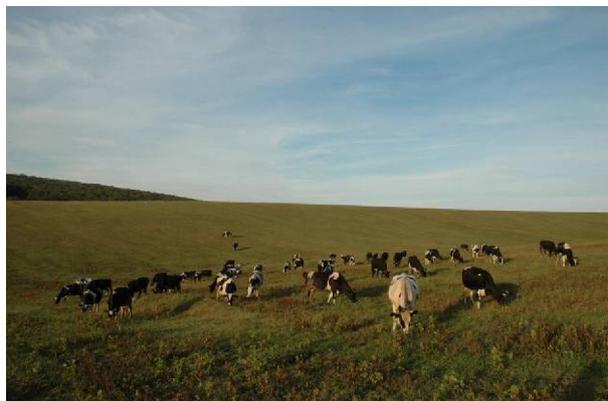
## **B. Farm of Yotkov family, town of Tzar Kaloyan**

The Yotkovs are young farmers, graduated veterinary doctors. Their farm is located in the yard of a former agriculture cooperative, which they share with a few other farmers and entrepreneurs. They have 50 buffalos.

The farm has only 1.2 ha of own land. The grazing land they use is part of the common land upon an agreement with the municipality of Tzar Kaloyan. There is a stock-breeders’ association in Tzar Kaloyan which officially uses the common grasslands, and as members of this association the Yotkov’s have their share as well.



Picture 9: Buffaloes grazing in open woodland officially designated as forest



Picture 10: Cattle grazing on common land near the town of Tzar Kaloyan

One issue of concern is the fact that the common grasslands were officially divided between the registered farmers only. However, there are also a lot more villagers with animals which graze on the same land. Thus, the grazing pressure on the land is quite high. Yotkov’s are worried that on the one hand there is not enough grazing resource for their animals and on the other hand they are ‘officially’ responsible for the good status of this land. If any on-the-ground controls come to the region, they will be the ones who will be fined, and not the

‘trespassers’. However, they agree that this issue has to be solved by the municipal authorities who will need to take into account the non-registered livestock in the division of the common grasslands. And yet, they have to let their animals graze in other areas also unofficially – e.g. in the nearby forests.

Otherwise, the main marketing strategy for the buffalo milk so far is to sell it to a milk processing unit, which diversifies also in buffalo products. The strict hygiene rules are seen as a major challenge by the couple. They are veterinary experts and still cannot see the reasoning behind some of the requirements which are imposed to them. Both agree that this is going to be a major expenditure in the coming years. However, they are committed to make the investments and rely on the measures under Axis 1 Competitiveness as well.

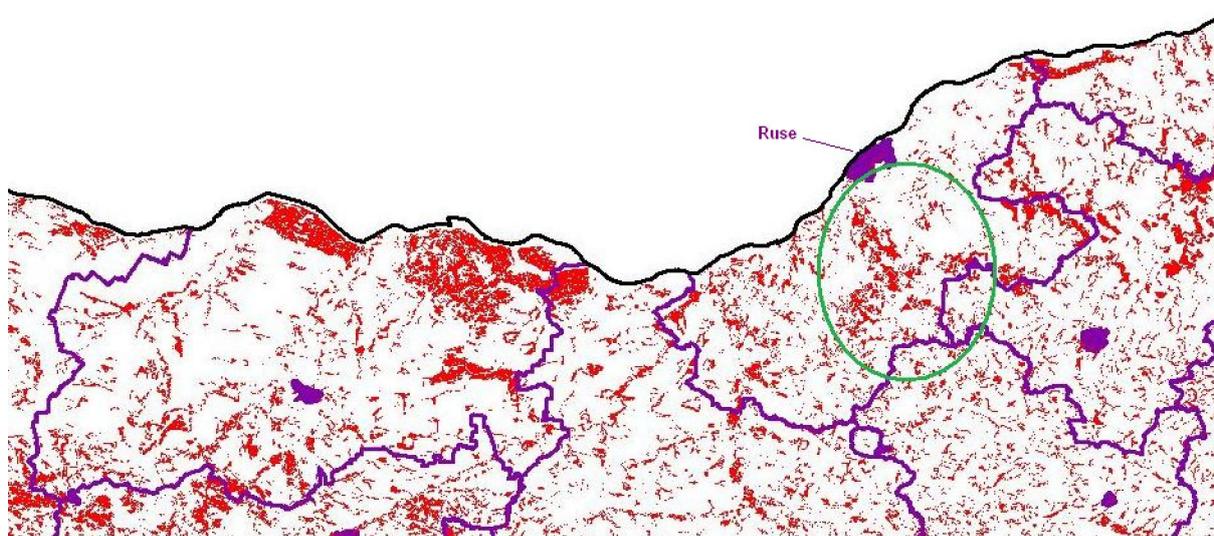
### **C. Farm of Miliyo Trufilov, village of Shtruklevo**

The farm is located in the village of Shtruklevo and has 46 buffalos and 22 calves. They own 2 ha of land. The grazing is on common grassland. The milk is sold to the same milk processing unit in the region. The farmer diversifies in forestry activities as well, mostly timber extraction and trade.

A common issue for both farmers is finding reliable farm workers. There is a high turn-over which especially in the case of buffalo breeding is problematic. The animals get used to the people taking care of them and refuse to follow instructions from new workers. In such situations both families have to do most of the farm work themselves which means long working hours and no days-off.

## **VI. POLICY ISSUES**

All registered farmers and land in Bulgaria are eligible to apply for the single-area based payments (SAP scheme) and the agri-environmental schemes for high-nature-value farmlands (if they manage such areas). Since 2005, the number of registered farmers in Rusenski Lom has increased because of the expectations of farmers to get financial support under the EU agricultural payments.



Map 3: Administrational map of HNV farmlands in and around Rusenski Lom and Lomovete site (2007)

The Bulgarian approach to identification of HNV farmlands followed the EEA approach with some adaptations to the national situation. The resulting map delineates the potential areas of High Nature Value farmlands in Bulgaria (see Map 3). The land uses considered for the mapping were grasslands, arable lands and orchards, as well as mixed land uses with proven biodiversity value.

However, the measures in the HNVP package of the agri-environmental scheme are related mostly to grasslands, as well as arable lands of importance for valuable bird species. There is an additional agri-environmental measure for traditional orchards which is outside the HNV package but still contributes to its objectives.

There are still large areas of grasslands in Rusenski Lom that are not registered, which means that either their owners are not eligible for support and or are not interested in applying. There are many rural residents willing to use their grasslands but they face several problems:

1. They have to register as agricultural producers in order to be eligible, which is not affordable because of the additional costs associated (mostly the need to pay social security payments);
2. Most of semi-natural grasslands consist of many small parcels which decreases the cost-efficiency of their management given the level of payments and the related costs on registration and maintenance of HNV farmland;
3. Furthermore, due to the small size of the parcels they may be ineligible for CAP payments, as the LPIS registration requirement is of min 1 ha per farm, comprised of parcels of min 0.3ha.

However, the perspective of receiving additional support for the management of the grasslands motivated a number of people to go through the process of registration. Payments are expected from the agri-environmental schemes for HNV grasslands, as well as for Natura 2000 compensation payments. The differences between the two payments, and the responsibilities associated with each of schemes, are still unclear.

The opportunities for financial support to young farmers have resulted in registration of young farmers and/ or transfer of ownership to young family members in the study area. There are a number of examples from the region where young farmers are registering and rely on the additional support for investing in their farms. All of the managers of the case study farms were actually young farmers.

Strict hygiene requirements (as compared to other EU member states) in animal-breeding and the lack of differentiation for small and medium-sized enterprises, does not allow them to sell end products, which determines also the lack of local products for direct sale in the region. So far, the only option for small scale producers is to sell milk to milk collection points. This is often seen as an unfair situation in which middlemen make most of the profits without providing any support or engagement with the farmers. Financial support, as well as tailored legislation for small and semi-subsistence farmers, could be a precondition for creation of markets and local brands for end products and revival of the stock-breeding sector.

On the other hand there are sheepfolds and goat herds which exist in the region and are entirely outside the official system. One such example is the sheep and goat herds (probably a subsistence one) in the caves of the canyon which are officially not registered at all.

Another significant issue in the region was the use of common land for grazing. There are two ways of dealing the situation with common grasslands in Bulgaria which were recommended by the Ministry of Agriculture:

1. Form association of farmers at municipal level, which can apply together for the SAPS payments and then redistribute the money among the users of the land.

This approach was used in the Rusenski Lom municipalities and was initially seen as a fair development. However, the fact that the associations are formed only by officially registered farmers means that the rest of the rural residents who also graze their animals on the common land have no official rights to use it and be paid for it. Yet, in reality the animals of rural residents also graze on the common land and create severe competition for the grassland resource, especially in dry years. On the other hand, overgrazing (sometimes as high as twice the grazing capacity) is becoming not just a fodder issue for officially registered farmers but also a control issue. GAEC requires them to keep the grasslands in good conditions and when controls come they will be the ones suffering the penalties.

2. Individual farmers get permission paper from municipality council for part of the grasslands.

This approach was seen as too much paperwork by the local authorities and was implemented in few regions of the country only.



Picture 11: Sheep pen in caves near village of Kochov outside the official system



Picture 12: Sheep and goats from rural residents coming back from grazing on common land

## VII. RECOMMENDATIONS

### 1. Solve the issue of redistribution of common grasslands

It is very encouraging that the Ministry of Agriculture advised the municipal authorities to redistribute the common grasslands to farmers so that they may benefit from the SAPS scheme for all the land they use.

However, the implementation of this recommendation at local level needs to be revised in order to accommodate the needs of the rural residents for grazing land. The fact that they are not officially is not a good enough reason not to provide for grazing lands for them. This is not helping the officially registered farmers or the subsistence ones. It only creates tension at local level as well as serious overgrazing of near-village grasslands.

### 2. Encourage subsistence and semi-subsistence farmers to register their grasslands in the LPIS

This will allow them to become part of the official redistribution systems of the common grasslands; to receive payments for the maintenance of the HNV grasslands which they are

doing anyway; and will improve the official monitoring and control of the GAEC at local level.

However, this step requires a significant mentality shift in many of the local, regional and national agriculture administrators who see subsistence and semi-subsistence farmers as 'history' or activity so marginal that is not worth the effort at all.

It will also require an ongoing and long-term involvement with these farmers to support them develop their farms to the level of minimum official 'viability' which is required by the national policy. This means additional capacity at local level to provide technical and expert support to farmers which may often go beyond the application/agronomic help that they are entitled to get now.

### **3. Review the national hygiene regulations requiring all size farms to meet the same criteria**

It is widely recognized by both farmers (small and large scale equally) and policy makers that many of the requirements forced on farmers are too theoretical and do not correspond to the existing reality of Bulgarian farming. Furthermore, many of them are so strict that there are few other European countries which have similar requirements. This is especially the case with the on-farm hygiene requirements. There is an urgent need to revise them and to make them applicable to the farming practices in Bulgaria while still delivering high milk quality.

EFNCP is a Europe-wide network which raises awareness of the importance of low-intensity farming for nature conservation and aims to improve the way public policies respond to the needs of these farming systems.

**European Forum on Nature  
Conservation and Pastoralism**

[info@efncp.org](mailto:info@efncp.org)

[www.efncp.org](http://www.efncp.org)



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Vienna  
+43 1 524 54 70  
Bucharest  
+40 21 3174996  
Sofia  
+359 2 9505040

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