

Review of the implementation of EU-FAS policy in Member States of EU- Bulgaria

This report was prepared by **Dr. Violeta Dirimanova** (University of Plovdiv)

I - Executive summary

The European Union-Farm Advisory System (EU-FAS) must ensure that farmers have access to advisory services and understand the European Union rules for implementing good agricultural and environmental practices. In Bulgaria, advisory services are provided by public body – The National Agricultural Advisory Services (NAAS) and private advisory providers. The major role of the NAAS is to provide advisory services to farmers (especially for small agricultural holdings). Therefore, the NAAS as a public body fulfils the obligations of Bulgaria to exist and to access a system for farm consultations, according with Art 12 and Art 15 of Council regulation 1306/2013. The NAAS is a main representative of the advisory system in Bulgaria and takes the biggest share in advisory system in Bulgaria compare with private advisory providers and scientific organizations in the country.

The EU-FAS in Bulgaria is widely understood as an agricultural advisory system mainly carried out by the NAAS at the national level and their regional agricultural advisory offices in Bulgaria, which provide advisory services according the general EU requirements. This is a fact because the NAAS has already participated in many activities including those formulated in the EU-FAS objectives.

At the regional level (NUTS3), the EU-FAS, in Bulgaria, is represented by 27 regional agricultural advisory offices (RAAS). Those regional offices are part of the NAAS structure. The system is certificated, coordinated and controlled by the Ministry of Agriculture, Food and Forest (MAFF). The region advisory offices offer horizontal services to all farmers. The advisory services from RAAS are available to all farmers in the over the country eligible for support the CAP.

The EU-FAS in Bulgaria need to garanty that farmers has access to advisory services and receive informationa and support on the base of their specific needs. In addition, the EU-FAS in Bulagria have obligations to provide information about the statutory management requirements and the standards for good agricultural and environmental conditions (“cross-compliance”) and agricultural practices for the climate and the environment and maintenance of the agricultural land (“greening”). The EU-FAS in the country follows the measures from both the Rural Development Programmes (RDP) such as farm

modernisation, competitiveness building, sectorial integration, innovation and market orientation, promotion of entrepreneurship and, also, measures related to water protection, efficient and sustainable water use use of plant protection products, integrated pest management, etc.

An article 10 of the Law on Support for Agricultural Producers (Promoted in State Gazette №58/ 1998, last amendment State Gazette № 77 / 2018) provides the legal provisions and setting up of FAS system in Bulgaria. By establishing NAAS, Bulgarian government fulfills the obligations for existing, functioning and having access to farm advisory system in the country, in accordance with Art. 12 - Art. 15 of the of the Council No 1306/2013. The legal framework for advisory system and the implementation of the EU-FAS in Bulgaria includes several national regulations. These regulations are:

- Law on the Agricultural Academy, and in particular Article 1, defining, establishing and functioning of the National Agricultural Advisory Services;
- Bulgarian Law for supporting agricultural producers (Article 10 in Farm Support Act);
- Law on Agricultural Academy;
- Regulation No. 7 of May 5, 2016 provides measure 2.1.2. “Advisory services for small agricultural holdings” under measure 2, RDP 2014-2020;
- Regulation No. 13 of May 19, 2015 for implementation of sub-measure 2.1 “Support for the use of advisory services” under measure 2 of the RDP 2014 - 2020;
- Regulation No. 10 of June 10, 2016 is for implementation of sub-measure 6.3 “Start-up aid for development of small farms” under measure 6 “Supporting farm and business development” in the RDP 2014 – 2020;
- Regulation No. 3 of January 29, 1999 is for establishing and maintaining a register of agricultural farmers;
- Regulation No. 18 of May 27, 2009 (article 16) related to the quality of irrigation water;
- The National Action Plan for Climate Change (NAPCC) for period 2014-2020 identifies different measures in the agricultural sector for which the NAAS is responsible.

Therefore, the NAAS operates in really complex legislative environment and there are a large number of regulations that may affect NAAS works and activities.

II- Extensive description of the implementation of the EU-FAS in Bulgaria

Bulgaria is located in South-Easter Europe. The population of the country is 6 986 914 (2019). The country sharing its borders with Romania, Turkey, Greece, Serbia, and North Macedonia and Black sea (110,990 square kilometres). The country is divided into 6 planning regions (NUTS 2), 28 administrative regions (NUTS 3) and 264 municipalities (LAU 1). Percent of rural areas in Bulgaria is 81% of the whole territory (RDP 2007).

The agricultural sector is one of the main sectors in the country, where around 70% of the total arable land is privately owned, 22% is owned by municipalities and 5% is state property (RDP, 2007). Agriculture's contribution to employment in Bulgaria is 6.26% for 2017 (Annual Report MAFF, 2017 and 2018). GDP per capita for Bulgaria is 7 876.15 EUR per inhabitant (Eurostat, 2019).

In Bulgaria, land for agriculture purpose is 5 021 412 ha, or around 45.2% of the territory of the country (MAF 2018). The Utilized Agricultural Area (UAA) is composed of arable land, perennial crops, permanent grassland, family gardens and greenhouse area. Arable land is 3 480 991 ha or 69.3% of the UAA, permanent grassland – 140 966 ha or 5.6%, vineyards – 52 517 ha or 3.1%. The total number of agricultural holdings is 370 500, which cultivate 3 616 965 ha with average UAA per holding around 12 ha. In 2017, total number of farmers applied for receiving Direct Payments were 113 600 (Annual Report, MAFF, 2018).

In this section, it will be describe and discuss more extensively the implementation of the EU-FAS in Bulgaria. In the introduction part, it will be given brief overview of the first implementation RDP (2007-2014) and second implementation RDP (2014-2020). Then, it will be explained the “boundaries” of the implementation of EU-FAS in Bulgaria. In third part, it will be “identified” the advisory supplier(s) selected for the implementation of the EU-FAS regulation. In the fourth part, it will be specified the quality of internal and external control of EU-FAS in the country. In the fifth part will be given main “attributes” of the services and finally, it will be presented “financing” of the services implemented under EU-FAS in the country.

A) Introduction – General overview about the EU-FAS implementation

The Farm Advisory System (FAS) is a system that supports farmers to understand and meet specific EU rules. In Bulgaria, the FAS is organized and represented by public body – National Agricultural Advisory Services (NAAS). The NAAS is the main manager and coordinator of the public advisory system in the

country, while the MAFF is the national authority responsible for certification and control of the FAS in Bulgaria. In the last years, EU-FAS in Bulgaria contribute to successful implementation of the CAP.

Implementation of FAS during the first period 2007-2013: The FAS in Bulgaria has provided advises to the farmers through the NAAS. All farmers, even those who did not receive CAP support should be eligible to participate in the system. To secure the effectiveness of the system, the advisers should have the relevant qualifications. FAS in Bulgaria must ensure that priority is given to agriculture producers whose access to another advice services is most limited (young, small and semi-subsistence farmers). At this time, the NAAS has practically offered advisory services to the largest groups of farmers (small scale farmers and setting up young farmers) under RDP (2007-2013).

The most popular measures, where NAAS were eligible to provide advisory services to farmers, are: measure 112 for setting up young farmers, measure 141 for supporting semi-subsistence undergoing restructuring and measure 214 regarding to agro-environment payments. The other two measures (measure 121 for modernization and measure 311 for diversification into non-agricultural activities), in which the NAAS was also eligible to provide support, were not so actively used by their target groups. For these two measures, large farmers were main users and they preferred to receive advisory support from the private advisory organizations or private individual consultants.

During the period 2007-2013, the NAAS prepared nearly 16800 projects and applications for support under measures 112, 121, 141, 214 and 311 of the RDP (2007-2013). Through measure 143 "Provision of advice and consultation in agriculture in Bulgaria and Romania" under the RDP (2007-2013), NAAS has provided consultations to measure 141 for supporting the process of restructuring the semi-subsistence farms (5390 advisory packages). In addition, NAAS has provided around 5560 advisory packages for specialized advisory services in the field of crop and animal husbandry (Annual report NAAS, 2015).

Implementation of FAS for the second period 2014-2020: EU-FAS in Bulgaria provides different advices to the farmers in the follow subjects: cross-compliance, improving the professional capacity and knowledge of the NAAS staff, green payments (under the first pillar of CAP), the conditions for the maintenance of land eligible for direct payments, water and sustainable use of pesticides, and some rural development measures (contributing to farm modernisation, enhancing competitiveness, innovation and market orientation, etc.). The advisory system, also, cover other subjects such as diversification of their economic activity, risk management, environmental issues (climate change mitigation and adaptation, biodiversity and protection of water, etc.).

For the second period for implementation RDP (2014-2020), the NAAS is again chosen as the main advisory provider. The support that NAAS is eligible to provide advisory services is related to the direct

payments (Single Area Payment Scheme - with the greatest interest for farmers); support schemes for fruits and vegetables; the payment scheme for climate and environmental friendly agricultural practices, green direct payments; and advices on the National Apiculture Program. NAAS is also responsible for providing consolations for the following three measures: (1) sub-measure 2.1 "Support to help benefiting from the use of advisory services", (2) sub-measure 6.1 "Start-up aid for young farmers" and (3) sub-measure 6.3 "Start-up aid for development of small farms".

Under sub-measure 6.1, the advisory package includes advisory services and information for the following issues: the appropriate types of crops and animal breeding in farms; opportunities to support farm development; techniques and technologies for the cultivation of crops and animals; all registrations, permits and licensing regimes for starting agricultural activities; all applicable on farms National Standards for Good Agricultural and Environmental Land (GAEC) and Statutory Management Requirements (SMRs), as well as an assessment of the "green direct payments"; the efficient use of water resources on farms; etc.

Based on the annual reports of the NAAS (2018), the experts were participated or organized 4 623 informational events (including exported reception rooms for providing consolations) for the period from 2014 to 2018. During the period June, 2016 - Dec, 2018, 18 248 advisory packages were provided by sub- measure 2.1.2 (Annual Report of MAFF, 2018) including various types of consultations and detail analysis, evaluation and recommendations for farm development. In middle of 2018, for the measure 6.1, there were 4222 applications for supporting young farmers, while for measure 6.3, 4210 applications for development of the small farmers. The NAAS has provided advisory packages to their clients for free.

Presently, the NAAS, also, provides advisory services, knowledge and information in the follow measures and sub-measures:

- measure 1. Knowledge transfer and information actions;
- sub-measure 4.1 "Investments in agricultural holdings";
- sub-measure 6.1 "Start-up aid for young farmers";
- sub-measure 6.2 "Start-up aid for non-agricultural activities in rural areas";
- measure 9. "Creation of producer groups and organizations";
- measure 10. "Agroecology and climate";
- measure 11. Organic farming;
- measure 12. "Payment for Natura 2000 and the Water Framework Directive";
- measure 13. "Payments for areas facing natural or other specific constraints"; and

- sub-measure 16.4 “Support for horizontal and vertical cooperation between actors in the supply chain for the construction and development of short supply chains and local markets. Support for local promotion activities related to the development of short supply chains and local markets”.

In addition, the NAAS supports the measures under the National Action Plan for Climate Change (NAPCC), which aims to reduce and/or optimize the emissions from the agricultural sector and increase the awareness and the knowledge of both farmers and the administration in terms of actions and their effect on climate change.

So far, FAS in Bulgaria is not fully covered by private sector even though there are private advisory organizations, which provide advisory services to some of the measures under the RDP (i.e. farm modernisations or business start-up for young farmers). Although NAAS is one main of the main players in implementation of EU-FAS Bulgaria and provider of wide range of advisory services (related to agricultural production, cross-compliance, management, environment, climate changes, etc.), the number of the NAAS staff is low. In order to function successfully, the regional advisory offices should increase the number of experts and frequently to increase their knowledge and specializations.

In conclusion, the FAS in Bulgaria are represented mainly by the NAAS and research centres (public advisory provider), consultant organizations and farm associations (private advisory providers). They mainly provided information and advisory services about “cross-compliance”, measures related to climate and the environment and maintenance of the agricultural area, measures at farm level provided from the RDP, knowledge about water protection, water use and use of plant protection plants. The NAAS experts and scientific researchers (from the Agricultural Academy and Universities) provide mainly advices to small and middle scale farmers, while private advisory providers frequently work and provide consultations to large scale farms and to members to the farm associations.

The FAS in Bulgaria is followed the requirements for implementation main aims of the FAS-EU for supporting the farmers to understand the EU rules for environment, public and animal health, animal welfare and the good agricultural and environmental condition. However, at this stage, the FAS in Bulgaria do not have the capacity to cover the enormous amount of knowledge dissemination work and to meet the needs of access to information from numerous farmers. There is a considerable duplication in the activity of the NAAS with that of the Agricultural Academy and the Agricultural Universities. In this connection, it becomes obvious the need to coordinate and join the capacities and efforts of the regional and municipal services, universities and research institutes, as well as and the non-governmental sector, in the process of knowledge transfer and innovation in agricultural practice. The development of information and communication technologies may open new opportunities for

the dissemination of knowledge and good practices to the farmers. In summary, developing knowledge dissemination and farm advisory system requires: (1) strengthening the NAAS; (2) integration of the knowledge and consulting dissemination capacity of the executive agencies, Agricultural Academy and advisory services at the region level, as well as the non-governmental sector; (3) capacity building at municipal level, and (4) supporting the National Rural Network.

B) “Boundaries” of the implementation of the EU-FAS regulation

In this section, it will be presented legal “boundaries” (European and national) which affect the implementation of the EU-FAS regulations. The legislation is an important part related to the first and second pillar of RDP (2014-2020) and especially, implementation of measure 2. The legislation framework for the implementation of EU-FAS in Bulgaria that affect the activities of the NAAS is separated in two parts. First part of the checklist includes European regulations while second part covers national legislation¹. **European legislation** includes two main regulations which affect the activities of the NAAS:

1. Regulation (EU) No 1305/2013 of the European Parliament and of the Council of 17.12.2013 regarding support for rural development by the European Agricultural Fund for Rural Development (EAFRD) and repealing Council Regulation (EC) No 1698/2005 and in particular Art. 15, which describes measure 2 "Consulting services, farm management services and farm replacement" including activities and consultations for which provide support for the measure, requirements for consulting organizations and the mandatory and optional types of consultation;
2. Regulation (EU) No 1306/2013 of the European Parliament and of the Council of 17.12.2013 on the financing, management and monitoring of the Common Agricultural Policy (CAP) and repealing Regulations (EEC) No 352/78, (EC) No 165/94, (EC) No 2799/98, (EC) No 814/2000, (EC) No 1290/2005 and (EC) No 485/2008, and in particular Art. 12 - Art. 15 defining the establishment and development of FAS for farmers in the EU Member States.

There are 10 **national laws and regulations** regarding the activities of the NAAS:

1. Law on the Agricultural Academy, and in particular Article 1, defining, establishing and functioning of the NAAS;
2. The Farmers Support Act and particular Art. 10, defines the establishment and the scope of the Farm Advisory System in Bulgaria, participation of the NAAS in FAS and the ways of financing the NAAS advisory services.

¹ Annual Report of NAAS, 2017

3. Regulation No. 7 of May 5, 2016 provides measure 2.1.2. "Advisory services for small agricultural holdings" under measure 2, RDP 2014-2020. For this measure, the NAAS is the single beneficiary and offer 6 core advisory packages for smallholder farms;
4. Regulation No. 13 of May 19, 2015 for implementation of sub-measure 2.1 "Support for the use of advisory services" under measure 2 of the RDP 2014 - 2020. In the regulation, it describes the NAAS conditions and requirements for the provision of farmers, candidates under sub-measure 6.1 "Start-up aid for young farmers" of RDP 2014-2020 for advisory package A2B in priority area 2B "Facilitation of entry of suitably qualified farmers to the agricultural sector, and in particular intergenerational continuity";
5. Regulation No. 10 of June 10, 2016 is for implementation of sub-measure 6.3 "Start-up aid for development of small farms" under measure 6 "Supporting farm and business development" in the RDP 2014 – 2020. In article 13, paragraph 3, the business plan of candidates for sub-measure 6.3 is prepared by the NAAS for free of charge;
6. Regulation No. 3 of January 29, 1999 is for establishing and maintaining a register of agricultural farmers. The Regulation states that registered farmers are entitled to receive advice services from the NAAS for free, as well as receive price information for agricultural products in the market;
7. Regulation No. 18 of May 27, 2009 is related for the quality of irrigation water. In article 16 is written that the NAAS provides the landowners and land users information related to irrigation technologies, irrigation standards, nitrate requirements vulnerable zones, etc;
8. Internal regulation on the NAAS structure and their activities;
9. Decree No. 185 of June 30, 2011 shows the amendment of Decree No. 125 from the Council of Ministers (2006) for adopting the Regulation of the Ministry of agriculture and food. The Decree No. 185 is written that the implementation of activities under measure 143 of the RDP 2007-2014 and measure 2 of the RDP 2014 - 2020 may increase the NAAS staff up to 50 experts with temporary employment contracts;
10. The National Action Plan for Climate Change (NAPCC) for period 2014-2020 is approved by Decision No 439 of the Council of Ministers of 01.06.2012. In the NAPCC are identified different measures in the agricultural sector for which NAAS is responsible:
 - Priority axis 1: Measure "Improving the knowledge of farmers regarding humus conservation activities" fertilization (precise fertilization, green manure), liming, soil cultivation, prevention of stubble burning, anti-erosion, etc. (with indirect impact),
 - Priority axis 1: Measure "Introduction of water-saving and energy-saving irrigation technologies" (with indirect impact),

- Priority axis 2: Measure “Encouragement of extensive grazeland husbandry” (with indirect impact),
- Priority axis 3: Measure “Improvement of management and use of manure” (with direct impact), and
- Priority axis 3: Measure “Introduction of low carbon practices for processing of manure”, for instance composting, transformation of manure into biogas under anaerobic conditions (with direct impact).

According to above measures, the MAFF, in the national level, is the responsible institution for efficient implementation of advisory system while the NAAS is registered as a target group. The aim of the NAAS is to organize trainings and consultations to farmers on the issues of humus conservation, water-saving and energy-saving, irrigation technologies, extensive grassland husbandry, farm management and use of manure. The NAAS will receive funds from the state budget and under the RDP 2014-2020.

- Priority axis 4: Measure “Improvement of the awareness and knowledge of farmers regarding the possible use of plant residues and threats posed by stubble burning” . The main task of the NAAS is to organize trainings and information campaigns and to advise farmers on the use of plant residues and reduction of the burning of stubble. The NAAS is responsible institution for this measure.
- Priority axis 6: Measure “NAAS training at national and regional level”. The MAFF is the responsible institution. In this measure, the NAAS, as a main national body that provide advice services to farmers, will receive funds from the EU and state budget for training their experts at the national and regional level.

Based on the above information, it can be summarized that the NAAS operates in really complex legislative environment and there are a large number of regulations that may affect the NAAS activities. In the second phase of the FAS implementation, NAAS provides advisory services for both mandatory (cross-compliance, practices beneficial for the climate and the environment, farm modernisation, water directive, pesticide directive) and voluntary (diversification of economic activities and information related to climate changes, biodiversity, water).

The NAAS is the only one organization, which is defined for implementation the sub-measure 2.1.2 “Advisory services for small holdings” under M02 “Rural Advisory, Farm Management and Replacement Services” , RDP (2014-2020) and approved by the EU to provide farm advisory services. The main beneficiaries of the farm advisory services are mainly small farmers (young farmers and semi-subsistence farmers). NAAS offers a comprehensive “advisory package”, including consulting about how to establish a farm, specialize consultations about agricultural, livestock and agricultural economics aspects and about rural development measures.

C) “Identity” of the suppliers selected for the implementation of the EU-FAS regulation

The main supplier for FAS implementation in Bulgaria is the *National Agricultural Advisory Services*. The NAAS has 27 regional offices, located in each of the district centres in Bulgaria. Each office disposes of experts specialized in livestock breeding, plant growing and agrarian economics. There are, also, other private advisors, foundations, non-government organization and independent advisors. They are not authorised structures for sub-measure M02.1.

NAAS is the secondary authority at the MAF. The main office is legal entities funded with headquarter in Sofia and has 27 *regional agricultural advisory offices (RAAS)* in the country. The NAAS provides consulting services and technical assistance to farmers for implementing efficient and competitive agricultural practices in Bulgaria. The main mission of the NAAS is supporting the implementation of the state policy in the agricultural sector and achieving the MAFF priorities and objectives for implementation of efficient and competitive agriculture in Bulgaria. Also, NAAS offers qualitative advisory services to farmers, information, and training and technical assistance. There are two administrative units in the NAAS – general administration for “Administrative and financial activities” and “Extension services”. At the end of 2018, the specialized administration “Extension services” was organized in 27 regional offices and 3 departments - Department “Training, information and activities, and analyses” and Department “Extension services for the national and European programme” and one “Analytical laboratory”. The number of employees of the NAAS is 49 including the Executive Director (Annual Report of NAAS, 2018). With the latest amendments to the Rules, new functions of the NAAS have been entrusted to the Rural Development Program (RDP) 2014-2020.

According to Decree No. 185 of the Council of Ministers, 2011 (State Gazette, issue 52 of 2011, supplemented of SG No. 29 of 21 April 2015), the NAAS has the right to appoint up to 50 persons from outside as external experts for the implementation of their activities under measure 143 "Provision of advice and consultation in agriculture in Bulgaria and Romania" of the RDP 2007-2013 and RDP 2014 - 2020, including Measure 2 “Consulting, farm management and farm replacement services”. The funds for salaries and social security contributions, as well as the overall maintenance of these employees, are provided by the NAAS funds obtained as a result of the activities performed under these measures. The exact number of staff depends on the successful implementation of RDP for the two implementation periods. The staff can be employed only if the NAAS provides a significant number of sets of advisory services under measure 143 of the RDP (2007-2013) and measure 2.1 of the RDP (2014-2020).

Measure 143 “Provision of advice and consultancy in agriculture in Bulgaria and Romania” from RDP (2007-2023) aimed to increase the added value of the farms through integrated consultancy services, which will increase the return on labour. The main part of the measure 143 was to support applicants in measures 112, 141 and 214.

Measure 2.1 “Support for the use of advisory services” from RDP (2014-2020) aimed to integrated consultancy services and to support small farmers. The budget of the NAAS is mainly received by the MAFF, implementation of rural development measures and also payments, which come from own revenues, donations, grants, revenue of training and information activities, consulting services and funds received by international projects and programs. The main aim of the NAAS is to implement the public policy in agricultural sector and to follow those priorities and objectives of the MAFF for achieving effective and competitive agriculture in Bulgaria. To achieve above aim, the NAAS contributes for developing the national system for agricultural advices, provides advisory services, actual and useful information, training and technical assistance to agricultural producers. During the organized events by NAAS, a wide range of long and short term of courses and trainings with theoretical and practical agricultural knowledge to agricultural producers was provided.

27 Regional Agricultural Advisory Services (RAAS) in advisory system are organized and managed by Directorate “Extension services” in 27 regions. The staff of RAAS includes agricultural engineers, agro-economists or agroeconomists. RAAS experts are responsible for writing application for RDP measures, business plan for farmers and advising farmers on agricultural technology. Also, regional offices are supporting the transfer and application of scientific and practical achievements in the field of agriculture; providing specialized consulting in the field of agriculture; organizing and conducting training for farmers; assisting by providing information; and providing a set of advisory services to individuals under the conditions and requirements of the rural development measures for first implementation period (2007-2013) and for the second period (2014-2020). The RAAS, often, cooperate with government and non-government organizations in the field of agriculture for information, knowledge and organization for common events.

The NAAS provides advisory services to farmers in different activities such as:

- European and national standards of their farm productions;
- on the direct payment of CAP;
- on statutory management requirements and the conditions for maintaining the land in good agricultural and environmental condition;
- on statutory requirements for meeting the requirements of Directive 91/676 / EEC (Nitrate Directive);

- on the specialized advice about crop and livestock productions;
- for the sub-measure 2.1.2, sub-measure 6.1 and sub-measure 6.2 RDP (2014 – 2020) and the Thematic Sub-Program for the Development of Small Farms;
- on basic conditions for the functioning of the farm - registration as a farmer, taxation and provision of farmers, registration of agricultural machinery and other mandatory registrations, depending on the type of agricultural activity;
- for conducting agrochemical analyses of soils.

The specialized advices provided by the NAAS are related to crop production, livestock and agricultural economics:

- Crop production: agro-technical and plant protection measures for different types of crops; technology of cultivation of different types of crops; creation and restoration of permanent crops and vineyards; organic farming - opportunities, conditions, requirements, certification; pasture restoration; water management; and new agricultural machinery for growing crops.
- Livestock: animal health and hygiene requirements; feeding different species of animals and birds, according to age and physiological condition and organic livestock breeding.
- Agrarian economy: business planning; strategic planning on the farm; taxation of farmers; marketing analyzes; sale of agricultural products; cost calculation; risk management and opportunities for financing the farmers - subsidization, leasing and more.

The NAAS provides, also, other types of advices to the farmers such as agrochemical soil analysis; registrations and categorizations of animal holdings including bee production; registration with the Executive Agency for Vine and Wine (EAVW) and issuing of documents; registration with the Executive agency for variety testing, testing and seed control; registration with the Bulgarian Food Safety Agency (BFSA), other agricultural registrations, authorization and licensing regimes; farmers financing and credit schemes (outside RDP).

Private advisory services, non-governmental organizations (NGO and foundations) also provide consultations to farmers and prepare application projects under rural development measures but different from sub-measure 2.1. *The private advisory organizations* also carry out trainings and organized meetings. Also, they received opportunity to be included in the register of consultants who are entitled to provide consulting services. During the first implementation period of the RDP 2007-2013, private advisors and NGOs² have provided consultations to large scale farmers mostly under

² Good example for NGO is the Bulgarian Association of Advisors for European Programs (BAKEP) is a non-governmental professional organization of advisory companies and independent experts whose activity is focused on efficient absorption of European funds. BAAEP is established by several advisory companies and few individual advisors (41 well-established consulting companies and individual experts). The BAAEP specialized in the field of European programs. The main goal of the BAKEP's partner circle is to create strengthened expertise.

measure 121 for modernization of agricultural holdings . The interest was very large because it covers all farmers, without limiting the types of production. At the end of financial period in 2015, the final budget for the measure 121 increased to EUR 540 million. The financial resources are increased by 15% and the total public resources under the measure make up 58% of all public funds allocated under Axis 1.

During the second implementation period of the RDP 2014-2020, private advisors provide advises to different measures for large farmers and also provide consultations for preparing applications under sub-measure 6.1 “Start–up aid for young farmers” and 6.3 “Start–up aid for small farms” to small scale farmers. In this case, the farmers should pay for provided advisory services.

Advisory services are also provided by leading **universities and research institutions** in Bulgaria. For instance, *Agricultural University – Plovdiv* provides advises in research and educational activities for the development of organic agriculture in Bulgaria. The agri-environment center at the Agricultural university also functions as a demonstration center for organic farming³. *The Agricultural Academy*, which is the secondary unit to the MAFF, also provides advice to farmers, through its 26 research institutes, which are located in different regions in the country. All of these institutes show the diversity of specializations, which is a prerequisite for providing mainly specialized technological advices to farmers.

The analytical laboratory is mainly concentrated for preparing soil and other agrochemical analyses. The NAAS analytical laboratory makes soil sample analyses in connection with the measure 2 “Rural Advisory, Farm Management and Replacement Services” of the RDP 2014-2020. Based on the results of the laboratory analyses such as soil acidity, mineral nitrogen (including nitrate nitrogen and ammonia nitrogen), assimilated phosphorus, assimilated potassium, active calcium, humus, etc., the analytical laboratory prepares fertilization recommendations for the analysed crops. The laboratories at the universities also provide a variety of agrochemical analyses.

Through its activities, the BAKEP attempts to contribute to improving the efficiency of implementation and management of the whole project cycle for financing with European funds of the Bulgarian private and public sector. Thus may help to improve the socio-economic conditions for sustainable development in Bulgaria. Regarding RDP (2014-2020), the BAKEP provides advisory services to different RDP measures, such as sub-measure 6.3 “Start–up aid for small farms”, 6.4 “Support for investments in creation and development of non-agricultural activities”, etc.

³ Forestry University - Sofia provides consultancy services for project preparation, sampling and soil analysis. In their biological resources advisory service center develops technologies for different crops, technologies for the production of viticulture and horticulture and horticulture, as well as technologies for the cultivation of non-traditional crops. The Trakia University - Stara Zagora provides mainly specialized advices in the field of dairy farming.

Finally, we can summarize that the MAFF, represented by NAAS, is the main organization that participates actively in the first implementation period RDP (2007-2013) and second implementation period RDP (2014-2020). The private advisory organizations have a stronger position for large farmers, while the universities and agricultural academy participate indirectly in the RDP through their labs, advisory centres and trainings.

D) “Control” of the quality of the services implemented under the EU-FAS regulation

This section presents the procedures set to control the quality of the advisory services implemented under the EU-FAS regulation in Bulgaria.

Ministry of Agriculture, Food and Forestry (MAFF) is responsible for the designing/selection of the FAS bodies in Bulgaria. According to Article 10 of the Law on Support for Agricultural Producers the MAFF establishes a Farm Advisory System. The NAAS as a secondary structure to MAFF is authorized to provide advisory services under both implementation periods of the RDP (2007-2013) and RDP (2014-2020) in Bulgaria. The MAFF provides overall control of NAAS activities. Executive Director of the NAAS is responsible to manage and control overall operation of the advisory services and implementation of M02.1 and regional offices (RAAS). In each regional office, there are disposed of experts specialized in livestock breeding, plant growing and agrarian economics. The NAAS is financed by the national budget, measures of the RDP and other financial sources. The advisory services to farmers are free of charge.

The implementation EU-FAS in Bulgaria is monitored by NAAS. The responsible people of the NAAS for the implementation of the control system are: Executive Director of the NAAS; the head of the risk management board; members of the risk management board; General Secretary, the managers of the territorial RAAS; other employees holding positions of responsibility or performing accounting activities. The employees are not allowed at the same time to be responsible for approval, implementation, accounting and control on commitments and costs.

The NAAS Executive Director submits annual report to the Minister of MAFF on the service activities, which they have provided to their clients. The Minister of MAFF, also, needs to approve the budget draft of the NAAS. The Executive Director is responsible to implement the financial management and to control all programs, activities and processes in NAAS, in accordance with the principles of legality, correct financial management and transparency. The Executive Director, also, is responsible (1) for achieving the goals of the NAAS by developing and implementing strategic plans, action plans and programs; identifying, assessing and managing the risks to the achievement of the goals of the NAAS; (2) planning, managing and accounting for public funds in order to achieve the goals; (3) compliance

with the principles of sound financial management and transparency of public funds, as well as their lawful management and spending; (4) the establishment of an appropriate organizational structure for the effective implementation of the obligations; division of responsibilities for decision making, control and control performance; (5) ensuring that the internal control function is in line with the applicable one legislation; (6) documenting all operations and actions and ensuring traceability of processes in organizations; (7) introduction of anti-corruption procedures; monitoring and updating the Financial Management and Control System; (8) effective management and maintenance of the level of competence of employees; access, storage and protection of assets and information; etc.

The Executive Director appoints and dismisses the General Secretary and the staff of the NAAS. The General Secretary must exercise the administrative management of the advisory services, organize the distribution of tasks between the administrative units in the NAAS and controls the performance of the assigned tasks. At the regional level, managers of the RAAS offices should follow clear and accurate determining the task, deadlines, and give necessary guidance for task implementation. During the performance of the task, the RAAS manager is obliged to exercises ongoing control over the progress of its implementation. After the expiry of the specified term, the RAAS managers should accept the work done and to evaluate the degree of task completion. When the assigned task is related to making contacts with persons outside of the NAAS, the managers determine the task implementation and do operation control.

The internal rules and documents have been developed and / or updated and approved by the NAAS Executive Director, through which financial management and control of the activities were achieved. The General Administration in NAAS is organized to provide administrative services, financial accounting and internal control, maintenance of the material base and information system, management of transport activity and human resources.

There is no any *selection procedure* set by the MAFF for selecting advisory suppliers in Bulgaria because the NAAS is the only public organization, which is allowed to provide information and consultations under measure 143 of the RDP 2007-2013 and measure 2.1 of the RDP 2014 -2020.

The NAAS experts have requirements to be qualified and regularly trained. For this purpose, NAAS established the Vocational Training Center (VTC), which was licensed by the National Agency to Vocational Education and Training (NAVET) in 2007. VCT needs to meet the state educational requirements in the field of vocational training in agricultural and forestry.

VTC at the NAAS provides training to all newly appointed advisers regarding on the good agricultural and environmental conditions, agricultural practices beneficial to the climate and the environment set out in Regulation (EU) No 1307/2013 of the European Parliament and of the Council and good

management abilities as well. The MAFF as managing authority to RDP 2014-2020 every year and before start of a Bulgarian RDP carries out training on main requirements and eligibility criteria. Training per sector is carried out under the Operative Programme "Administrative Capacity" to all NAAS staff. NAAS participates in several international projects, some of which are designed to improve the capacity of NAAS in various aspects of the CAP, including sustainable land management, rural development, development of organic farming, fruits and vegetables common organization of the market, developing strategies and management of agricultural organizations, sustainable agribusiness, but also improvement in the milk quality, collection of data from small holdings, etc.

The target groups of the NAAS experts for providing advisory services, knowledge and support are:

- Small and medium-scale farms and semi-substance farms;
- Starting-up farmers and young farmers;
- Farms introducing agri-environment practices and organic farming;
- Farms in mountainous areas and non-preferable areas, which are other than mountainous areas;
- Rural population.

Since the beginning of 2011, the Information System for Management of Advisory Activities in the NAAS has been established. In the Information System makes more clear procedures for monitoring the implementation of EU-FAS. In the Information System, a NAAS expert needs to introduce all their consultation activities:

- the number of consultation persons by expert. Every advisory expert need to have a file with information about farmers with whom she/he works;
- all consultations given to one person, their frequency, type of advice, etc. Also, the System allows for additional and more in-depth analyzes of farmers' consultation needs;
- mobility for consultation - one person can be consulted by different experts in one or different offices. Through the Information System, the expert will become familiar with agricultural holding, with the provided consultations and other indicators. The last but not at least, the System makes it possible to monitor farm developments and impact of the provided consultations;
- The System only records consultations given personally when farmers visited the RAAS office (including remote office) or visiting the farm by expert. Information and consultations provided by telephone or e-mail, as well as consultations provided during information events, are not included in the System;

- The System generated different types of reports regarding number and type of consultations or farm visits. In 2017, each RAAS office has provided around 3436 consultations for this period, which is an average of 286 consultations per month or 13.6 consultations per day.

This system of quality management is not only created to provide control and monitoring of the administrative processes but also for education and trainings to the farmers. The trainings are funded with European and national funds and therefore, they get these services free of charge. In the Information System, the "Consultations" module allows daily control over the activity of the offices, considerably facilitates the accountability in the office and improves the quality of the consulting services provided. The module contains the basic information related to the consulting activity under measure 143 of the RDP 2007-2013 and measure 2.1 of the RDP 2014 -2020.

E) "Attributes" of the services implemented under the EU-FAS regulation

In Bulgaria, there is no any formal system network among advisory suppliers. There are several reasons for the current situation: First of all, there is only one official public advisor – NAAS. Second, the private advisors, NGOs and foundations are well known but MAFF but there is no any formal communication among advisory suppliers. These are rather informal networks of cooperation, including advisors and scientists. The NAAS, private advisory suppliers and scientists do not always respond to new challenges and expectations of farmers. Therefore, they need to collaborate more formally through common organized seminars, workshops and trainings. In which, they can have opportunities for better exchange of knowledge and good advisory practices.

The NAAS as a main public advisory in Bulgaria has already established good communication with research institutes and universities. The NAAS experts were participated in the joint information and training events for the transfer of knowledge and technologies to the farmers organized together with research centres and universities. Such joint events were organized during first and second implementation periods of the RDP. NAAS applies various methods and channels to work and to inform their clients, such as:

- *Extended advices out of the office called "reception days"* – experts are organized information campaigns or reception days in the rural areas. During these receptions days, each farmer has the opportunity to receive up-to-date information and advices in the field of agriculture and rural development under the RDP (2014-2020), direct payment schemes and national support schemes. Detail information about the receptions days (dates, times and locations) is published on the NAAS website.

- *Farmer circles* – established in 2015, with aim to disseminate useful information to farmers and to promote good practices from the implemented RDP projects, as well as to increase the

efficiency of advices provided by the NAAS to more farmers. In this regard, the NAAS experts send information to the participants in the circle on important issues, including upcoming opening of measures from the RDP and other national and European schemes, as well as for upcoming trainings, seminars, information events, agricultural exhibitions, meetings. For the period from 2015 to June 2018, 27 farming circles were created, covering 27 regional cities. The average number of participants each year is about 315, which guarantees the high interest in this type of information dissemination. The NAAS experts send information by e-mail or telephone to the participants in the circle on important issues such as forthcoming opening of measures from the RDP and other national and European schemes, as well as for upcoming trainings, seminars, information events, agricultural exhibitions, exhibitions, etc.

- *Informal advisory services* –aim to improve the quality of advisory services provided by RAAS at the regional level with farmers, associations and representatives of local public organizations and state structures. The experts from the respective regional offices discuss with local participants for forthcoming events (trainings, seminars, information events, agricultural exhibitions) organized by them. The participants usually discuss suggestions for organizing different events, topics for information-training events, for joint event, upcoming opening of RDP measures and other national and European schemes. In 2017, 27 informal meetings were organized by NAAS, which were attended by over 300 farmers, NGO representatives, government institutions and other stakeholders.

NAAS, also, uses *traditional methods* to reach more people and more farmers, who live in the rural areas. The front-office of NAAS, usually, provide different distance learning types of resources (flyers and information materials), use their website and different media forms, write publications, participate in agricultural events and forums, and also participate in information campaigns organized by MAFF. The back-offices reply for all specialized and/or CAP issues by e-mail, phone or face-to-face. Also, they provide online resources to farmers and organize training modules to specific topics together with local university and/or research center. The channels have grown through the years according to the farmers' needs and willingness to receive advices by the NAAS experts.

F) [“Financing” of the services implemented under the EU-FAS regulation](#)

For Bulgaria, the planned expenditure for RDP (2014-2020) is EUR 2 917 848 203 (ENRD, 2015). 85% of planned budget is coming from European Agricultural Fund for Rural Development Programme (EARDP) and 15% comes from National contribution. The planned budget for measure M01: EUR 25 394 595 (around 2% of the total budget) and for measure M02: EUR 19 892 087 (around 1% of the total budget). Total sum of knowledge measures (M01 and M02) is EUR 39 763 410 (1.55% of total planned expenditure). The money spent until middle of August, 2019 in Bulgaria for measure M02 is over 35%

of the planned budget, while for measure M02.1 “Support for the use of advisory services” is spent almost 50% of the budget. (table 1).

Table 1: Expenditure for M02, EUR

Priority	EFRD and National Fund	EFRD, EUR	%
Planned Budget for M02, EUR	19892087	16908274	100
Spent budget for M02 until August, 2019, EUR	7044836		35,42

Source: own table based on the Annual Reports of RDP (2014-2020), MAFF

The financial support under sub-measure M02.1 provides different advisory services to small holdings. No payments were made to the sub-measure 2.1 until the end of 2016. The first payment has been done in 2016 with total amount of EUR 1 083 212 (Annual Report, MAFF 2017), where the NAAS experts provided different advisory packages (for climate and environment, water policy, information and consultations on mitigation measures, etc.) to 2872 applications. However, the largest numbers of submitted farm applications (in total 2824) were for starting-up support for the development of small farms - for crop production 1 409 applications, livestock holdings with 961 applications and mixed holdings 454 applications.

At the end of 2017, the amount spent for sub-measure 2.1 was EUR 946 254. Sub-measure 2.1.2, which includes the thematic sub-program for small farms, the NAAS has provided advisory packages to 1715 small agricultural holdings. In middle of 2018, for the measure supporting young farmers, NAAS experts has prepared 4222 applications, while for measure supporting small farms development, around 4210 applications. The sum, which has been spent for M02.1 until middle of 2019, is EUR 1 484 065.

In Bulgaria, the RDP (2014-2020) is the only program that covers the expenditures for farm advisory system. Therefore, there are no additional resources to support advisory system and no specific way to control the quality of the services provided by NAAS. The only way to receive a feedback of the advisory work is their success with applications and information system that shows the numbers of the consultations provided by NAAS expert. The expenditures for advisory services are free of charge and farmers do not have any costs for receiving advisory support from the NAAS expert.

III- Effectiveness of EU-FAS

A) Facts and figures about EU-FAS implementation

The aim of this section is to gather assessments, analysis, evidences of the effectiveness, and outcomes of EU-FAS implementation in Bulgaria. The small farmers can benefit from the advisory services provided by NAAS under measure 2. Advisory services for them are separated in three groups:

- Consultancy for the beneficiaries of direct payments - for cross compliance, green payments;
- Beneficiaries of the RDP measures - application of measures for young farmers starting aid for nonagricultural activities, producer organizations, agroecology, organic farming.
- Training consultants existing or new European and national legislation, innovations, practices, research results

For providing qualitative advisory services to small farms, the NAAS is the direct beneficiary under measure 2 “Rural advisory, farm management and replacement services” to provide the advisory packages for sub-measure 2.1.2 “Advisory services for small farmers”. In the RDP (2014-2020), the NAAS was involved for organizing information events (seminars, meetings, hosted meetings) in different locations, closed to the potential beneficiaries. The aim of these events was to provide information for RDP and knowledge for requirements about the programme. In the programme, NAAS has opportunity to increase its staff and to ensure quality of the advisory services.

The NAAS provides free of charge advisory packages. Regarding direct payments, the NAAS supports farmers with useful consultations about their activities. In 2017, the experts of NAAS provided 2920 consultations to 2691 farmers for the scheme for single payment for area, 1284 consultations to 1179 farmers for the scheme for green direct payments; 1110 consultations for 997 farmers for national programme for bee-production.

From start of the programme (June, 2016) until today, the NAAS provides advisory packages under sub-measure 2.1.2 “Advisory services for small agricultural holdings”. For the period 2016 to December 2018, the NAAS experts provided 18 248 advisory packages. The advisory packages include various types of consultation and detailed analysis, evaluation and recommendations for the development of their farms. Through these advisory packages, the small farms receive qualitative consultations and all project proposals complete on time. Under sub-measure 2.1. “Supporting in providing advisory services”, the NAAS provides 930 advisory packages including the preparation project proposals for candidates for supporting young farmers (Annual report of NAAS, 2018).

NAAS is also involved for providing advisory packages in 6 priority areas. These propriety areas contribute for economic development of the young farmers and for improving their environmental conditions of work. These priority areas are supported under sub-measure advisory services for small farms (sub-measure 2.1.2). Advisory packages are distributed to the sixth priority areas (PA):

AP1 (PA1) – advices regarding characteristics of the cross-compliance system, including all applicable national standards for good agricultural and environmental land (GAEC), all applicable in the economy management, as well as an assessment of the ensuing obligations for agriculture related to the areas of environment and climate change, public health, animal and plant health, animal welfare.

AP2 (PA2) - agricultural practices for climate and environmental benefits, water policy, as well as information and advice on mitigation and adaptation measures, biodiversity and water conservation.

AP3 (PA3) - requirements for guaranteeing the legal right of employees regarding the health and safety at work in the farm and the relevant rules and standards. Information and advice on different farm safety standards is also provided.

AP4 (PA4) - Implementation of the legislation on the proper use of plant protection products in accordance with the principles of good plant protection practice and the possibilities for leading the control of pests on crops by the methods of integrated pest management under the Plant Protection Act - conditions and order under application of integrated production of plants and plant products, general principles in integrated pest management through various agro-technical activities, conducting of plant protective measures of crops grown and planned for growing on the farm in accordance with good plant protection practices.

AP5 (PA5) – includes preparation of business plan and application for sub-measure 6.3 of RDP 2014-2020 and also, sub-measure 4.1.2 “Investments in agricultural holdings under the Thematic Sub-Program for the Development of Small Farms (TSPDSF)”, sub-measure 4.2.2 “Investments in processing/marketing of agricultural products under TSPDSF”, sub-measure 4.4.2 “Non-productive investments under the TSPDSF”, 6.4.2 “Investments in support of non-agricultural activities under the TSPDSF. The main activities included in these APs are the following:

- preparation and completion of the business plan for each application, in accordance with the relevant annex in the regulation for the implementation of the sub-measure;
- calculation of points on the project evaluation criteria for the relevant sub-measure;
- drawing up and completing an application for support;
- completing the required documents to support the application;
- providing advice on the implementation of the business plan.

AP6 (PA6) - Provides advice and information to assist small farms in the development of their farms - opportunities to assist small farms through measures and sub-measures applicable at the small farm level provided for in the RDP (2014-2020), which are supported modernization, building competitiveness, sectoral integration, innovation and market orientation; advice and information on issues and problems relating to the economic performance of the agricultural holding, including on issues of competitiveness and encouraging entrepreneurship of the small farmer; on agricultural risk management related to adverse climatic changes, pest management, plant and animal diseases.

Table 2: Advisory packages for sub-measure 2.1.2 distributed among 6 Priority Areas (Dec. 2018) provided by NAAS

Advisory packages for sub-measure 2.1.2	AP1	AP2	AP3	AP4	AP5.1	AP6
Provided to 31.12.2017	4 312	4 468	3 480	1 439	2 859	1 777

Source: Annual Report of NAAS, 2018

According to the Annual Report of NAAS (2018), the total number of applications under sub-measure 2.1.2 from the start of the providing advisory packages from 22.06.2016 to 31.12.2018 are 5 379. The advisory packages distributed among 6 priority areas are presented in table 2. Advisory packages for sub-measure 6.1, sub-measure 6.3 and thematic sub-program for the development of small farms are presented in the table 3.

Table 3. Advisory packages/consultations for sub-measures 2.1.2, sub-measure 6.1, sub-measure 6.3 and Thematic Sub-Program for the Development of Small Farms provided by NAAS

Advisory Packages	2018	2017	2016
Sub-measure 2.1.2 (advisory packages)	5379	4611	2872
Sub-measure 6.1 (consultations)	4523	6971	3968
Sub-measure 6.3 (consultations)	8386	11159	20478
Thematic Sub-Program for the	8038	11189	11162

Development of Small Farms (M4.1.2, M9, M11)			
--	--	--	--

Source: own table on the base of the Annual Reports of NAAS (2017, 2018, 2019)

NAAS also pays special attention to the consultations related to the third National Climate Change Action Plan (NAPCC) and the river basin management plans prepared under the Water Framework Directive and the Water Act for the period 2014-2020. The NAAS experts have been providing this type of consultation during the last years.

Since 2014, indirect and direct effects for the reduction of the greenhouse gas emissions under the National Action Plan for Climate Changes is supported by NAAS. For 2017, consultations regarding greenhouse gas emissions are 8287 to 4804 persons. The NAAS experts increased their consultations around 16% compare with 2016. Consultations with indirect effect on the reduction of greenhouse gas emissions for 2018 are:

Table 4. Consultations based on farm size (SPO)

Consulted persons based on size of the farms (SPO)	Number of consultations	% of the consulted persons
Less than 2000EUR	9 941	61,9%
Between 2000 EUR and 4000 EUR	2 179	13,6%
Between 4000 EUR and 8000 EUR	2 384	14,8%
Between 8000 EUR and 16000 EUR	1 083	6,7%

- Humus con
- Humus conservation activities (fertilization, green fertilization; liming, soil cultivation, abstinence, stubble, erosion, etc.), 1 824 consultations to 2710 persons;
- Water saving and energy saving irrigation technologies - 1682 consultations to 2319 persons;
- Extensive grazing of animals – 303 consultations to 383 persons;

Advices with direct effects provided by NAAS are:

- Opportunities for plant use residues and threats from burning stubble - 303 consultations to 383 persons;
- Improving the storage and application of manure – 1078 consultations to 1379 persons;
- Low-carbon manure processing practices (composting, anaerobic biogas processing, etc.) – 218 consultations to 210 persons.

In 2018, the NAAS experts provided 7 840 consultations to 4 431 persons, which is about 8% less than in 2017 and 1% more compared to 2017.

The main beneficiaries of the NAAS who receive advices, knowledge and support from their experts are: small and medium-scale farms and semi-substance farms, starting-up farmers and young farmers and farms introducing agri-environment practices and organic farming. The table 5 shows the number of consulted persons according to the size of their agricultural holdings based on the standard production output (SPO).

Table 5. Consultations based on farm size (SPO), 2018

Consulted persons based on size of the farms (SPO)	Number of consultations	% of the consulted persons
Less than 2000EUR	6 247	51,4%
Between 2000 EUR and 4000 EUR	1 569	12,9%
Between 4000 EUR and 8000 EUR	2 345	19,2%
Between 8000 EUR and 16000 EUR	1 645	13,5%
Between 16000 EUR and 25000 EUR	161	1,3%
Between 25000 EUR and 50000 EUR	122	1,0%
Over 50000 EUR	79	0,6%
Total	16 195	100%

Source: Annual Report of NAAS, 2018

From table 5, we can see that the largest share of consulted persons whose agricultural holdings are up to EUR 2000 (51.4%). The second largest agricultural holdings are between 4000 EUR and 8000 EUR (19.2%). These two groups are extremely important because farms of up to EUR 2000 SPO, receiving appropriate advices. They will probably be eligible for support under the Thematic Sub-Program for

the Development of Small Farms part of the RDP (2014-2020). While the agricultural holdings between 2000 EUR to 8000 EUR are candidates, which are the most likely appropriate for the Thematic Sub-Program. Farms with a size between 8000 EUR and 16000EUR have around 13.5%, personal consultations. They can become the potential candidates for sub-measure 6.1 of the RDP 2014-2020. Also, from the table 5, we can conclude that the NAAS experts also work with large farmers - 16.4% of the farmers have farms up to 8000 EUR. Therefore, NAAS mainly provide advices to small farms.

B) In-depth analysis of one domain

Bulgaria (2007-2013): The Bulgarian soil erosion control scheme was a part of its 2007-13 RDP. One of the a measures under the soil and water protection scheme requires farmers to take soil samples for analysis of nitrogen, phosphorus and potassium and prepare and implement a five-year nutrient management plan with the support of an advisor or qualified agronomist. The costs of these specialist services have not been covered since the end of 2009, when these services were no longer provided free of charge by the government advisory and laboratory service, but agri-environment payments were not changed to reflect this additional cost, nor was provision transferred to the free Farm Advisory Service (FAS) (Keenleyside et al, 2011). The free advice was funded under measure 143 provision of advisory services to farmers in Bulgaria (ENRD Background briefing: Nutrient management plans December, 2017). Under measure 2.1.2, soil laboratory was helping to small farmers. The laboratory carries out agrochemical analyzed of soil samples for acidity (pH), absorbable phosphorus and potassium, mineral nitrogen (ammonia and nitrate), total nitrogen in soil, determination of active calcium, determination of humus and determination of the rate of limiting of acidic soils. In 2018, the laboratory received 2036 samples and made 2033 samples for 10157 different analyzed for acidity (pH), absorbable phosphorus and potassium, mineral nitrogen (ammonia and nitrate), total nitrogen in soil, etc.

The focus of the new CAP in the next programme period will continue to support small and medium-sized farms as well as on encouraging young people to choose the profession of farmer. Each Member will provide at least 2% financial support to young farmers through direct payments. Also, during new programme period, the financial support to small farmers will increase and this may encourage the younger generation to become farmers. The EU will support also local schemes, such as mentoring young farmers from the experienced farmers, improving the transfer of knowledge from one generation to another or developing plans for the transfer the profession. Again, the EU is planning to provide consultations in setting up young farmers (similar to measure 112 and sub-measure 6.1).

I- Discussion

During last fourteen years, there were no many changes regarding farm advisory system in Bulgaria. The EU-FAS in Bulgaria is represented by the public advisory provider (NAAS). The main aim of the public advisory system is to support small farmers for organizing and implementing the rural development measures for both program periods. The need of precise information and knowledge to their "clients" is significant through the whole process of implementation measure 143 under RDP (2007-2013) and measure 2.1 under RDP (2014-2020). The important role of the NAAS during "coaching" small farms in rural areas, it should continue in the next programme period (2021-2027).

The key component for achieving high outcomes of the NAAS is to be well-organized cooperation between NAAS and researchers (for training and education), and also efficiently work cooperation between NAAS and the Directorates of MAFF and also local authorities at the regional level. The successful participation in projects funded by Horizon 2020 also gives to NAAS opportunity to exchange experience and to have good practices with their EU project partners. Therefore, this requires NAAS to have a strong position in agricultural sector and to support sufficient staff members, well-educated, motivated and responsible advisors in their region offices.

One of the main barriers for NAAS development is the restricted number of people working in the regional offices. Therefore, this may hamper the quality of offering advisory services and support to small farmers. If they try to keep minimum staff of three experts in the regional offices, this will give them opportunity to provide full professional advisory packages to small farmers.

Lack of cooperation among public advisory body and private extension companies, also, constrain farmers to choose to which extension services they may trust. Such shortcomings have to be taken into consideration in the designing the future development of EU-FAS in Bulgaria. Provision of advisory services should continue in the country and it should be one of the priorities of the CAP policy in the near future.

Factsheet about FAS assessment in Bulgaria for RDP (2014-2020)

Some Key facts about CAP implementation in France

- Number of farmers in the country.....	370 500 farmers
- Share of 2 nd pillar in CAP expenditure.....	9%
- Share of Knowledge measures (M01&M02) in the 2nd pillar of CAP.....	4.8%
- Planned expenditure per farmer (M01&M02).....	534 euros / farmer

Some Key facts about the implementation of the EU-FAS in France

Pillar one (Regulation n°#)

Level of application

x Regional National

Domain selected for the EU-FAS regulation

Mandatory

- x Cross-compliance
- x Payments for environment & climate
- x Modernisation
- x Pesticides directive
- x Water directive

Optionnal

- x Diversification
- x Risk management
- x Organic
- x Information on climate

Types of suppliers accredited

Indicate the type of suppliers accredited

- | | |
|---|--|
| <ul style="list-style-type: none"> <input type="checkbox"/> Private independent consultant/firms <input type="checkbox"/> SME or start-ups x Public extension organisation <input type="checkbox"/> NGO | <ul style="list-style-type: none"> <input type="checkbox"/> Chambers of agriculture <input type="checkbox"/> Farmers' rings or associations <input type="checkbox"/> Farmers' cooperatives <input type="checkbox"/> Private firms or retailers (inputs/outputs) <input type="checkbox"/> Bookkeepers <input type="checkbox"/> Other (specify)..... |
|---|--|

<input type="checkbox"/> Charities	
Method required for advisory services	
<input checked="" type="checkbox"/> One to one on the farm <input checked="" type="checkbox"/> One to one outside the farm <input checked="" type="checkbox"/> Small group advice on the farm <input checked="" type="checkbox"/> Small group outside the farm	<input checked="" type="checkbox"/> Telephone helpdesk <input checked="" type="checkbox"/> General information via Internet <input checked="" type="checkbox"/> Publication (paper copies) <input type="checkbox"/> No requirement
Conditions required to be accredited for advisory organisation	
<input checked="" type="checkbox"/> Competences of advisors <input checked="" type="checkbox"/> Training of advisors <input checked="" type="checkbox"/> Data base	<input type="checkbox"/> Networks <input checked="" type="checkbox"/> Monitoring of advice activities <input type="checkbox"/> Knowledge platforms
Target public (categories of farmers or farm workers)	
Target group specified..... <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Farms with more than 15000 € direct support <input checked="" type="checkbox"/> Smaller farms..... <input type="checkbox"/> Other farms' criteria	<input type="checkbox"/> Zoning criteria..... <input type="checkbox"/> Other criteria.....
Pillar Two	
Use of measure M02.1, M06.1 and M06.2, <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Number of beneficiaries: around 7600 (hard to calculate precise number of applications)	
Average expenditure per farmer: 1500 euros	
Domain selected <input checked="" type="checkbox"/> Cross-compliance <input checked="" type="checkbox"/> Pavement for environment & climate <input checked="" type="checkbox"/> Modernisation <input checked="" type="checkbox"/> Pesticides directive <input checked="" type="checkbox"/> Water directive <input checked="" type="checkbox"/> occupational Health <input checked="" type="checkbox"/> Farms setting up for the first time	

List of references

1. Aims of the NAAS administration (2019)
<https://www.naas.government.bg/data/file/otcheti/Celi%202019.pdf>
2. Aims of the NAAS administration, (2018)
<https://www.naas.government.bg/data/file/otcheti/Otchet%202018.pdf>
3. Annual Report of NAAS activities, (2018)
https://www.naas.government.bg/data/Godishen-otchet-NSSZ_za%202018_2019-04-04.pdf
4. Annual Report of NAAS activities, (2017)
<https://www.naas.government.bg/data/Godishen-otchet-NSSZ-za%202017g.-2018-04-05-final%20site.pdf>
5. Annual Report of NAAS activities, (2016)
<https://www.naas.government.bg/data/file/otcheti/Godishen-otchet-NSSZ-za%202016g.-2017-03-30-final.pdf>
6. Annual Report of NAAS activities, (2015)
<https://www.naas.government.bg/data/file/otcheti/Godishen-otchet-NSSZ-za%202015g.-2016-03-30-final.pdf>
7. Annual Report of NAAS activities, (2014)
https://www.naas.government.bg/data/file/norm_docs/Godishen-otchet-NSSZ-za%202014g.-2015-03-31-final%20za%20pechat.pdf
8. Annual Report on the state and development of agriculture, Ministry of Agricultural, Food and Forestry (2018)
https://www.mzh.government.bg/media/filer_public/2019/05/22/agraren_doklad_2019_bg.pdf
9. Annual Report on the situation and development of agriculture, Ministry of Agricultural, Food and Forestry (2017)
https://www.mzh.government.bg/media/filer_public/2018/02/28/agricultural-report-2017_en.pdf
10. Annual Report on the state and development of agriculture, Ministry of Agricultural, Food and Forestry (2016)
https://www.mzh.government.bg/media/filer_public/2018/02/28/agricultural-report-2016_en.pdf
11. ENRD (2015) https://enrd.ec.europa.eu/sites/enrd/files/bg_base_qnt_summary_v1.pdf

12. Dirimanova (2013) PRO AKIS - Prospects for Farmers' Support: Advisory Services in European AKIS Coordination and Support Action, no: 311994 funded by Seventh Framework Programme THEME (KBBE.2012.1.4-07)
13. Dirimanova, V. and T. Radev (2014) Knowledge transfer in the agricultural sector in South-Central region of Bulgaria, PRO AKIS - Prospects for Farmers' Support: Advisory Services in European AKIS Coordination and Support Action, no: 311994 funded by Seventh Framework Programme THEME (KBBE.2012.1.4-07)
14. Dirimanova, V. and M. Rusu (2016), Analysis of Agricultural Knowledge and Information System in Bulgaria and Romania, Agricultural Sciences, Vol. III, Issue 20.
15. Dirimanova, V., (2014), The role of the National Agricultural Advisory Services for development of the small scale farmers in Bulgaria. Science & Technologies. Social Studies. Vol. IV. Number 7, p. 95-99.
16. Evaluation of the Implementation of the Farm Advisory System, Final Report – Descriptive Part, (2009), This report has been prepared by ADE at the request of the European Commission.
17. Labar, K., Dirimanova, V. and I. Theesfeld, The role of Bulgaria's extension services in supporting the CAP, Outlook on Agriculture, vol. 41, no. 1, pp 21-35;
18. Koteva, N. and B. Fidanska (2018), Development and Support of Small Farms in Bulgaria, Economic and management of agriculture, 63, vol 1, pp.1-18.
19. Sutherland, Lee-Ann; Madureira, L., Dirimanova, V., et al (2017), New knowledge networks of small-scale farmers in Europe's periphery, Land Use Policy, Vol. 63, p.428-439
20. The Farm Advisory System (FAS) under Title III of Regulation (EU) Nr. 1306/2013 Questionnaire for Member States' notification pursuant to Article 102(2) of regulation (EU) Nr. 1306/2013, Document draft printed on (Feb, 2019)
21. Ex-post assessment of RDP (2007-2013), final report. ИНСАЙТ ПРСР” със съдружници Екорис Саут Ийст Юроп ЕООД и БИМ Консултинг ООД.
22. Third National Action Plan for Climate Change (NAPCC) for period 2014-2020 (2012) support of the Norwegian Government through the Norwegian Cooperation Programme for Economic Growth and Sustainable Development in Bulgaria