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European Union CAP New Delivery Model – The Bulgarian Case

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Abstract: The New Delivery Model of the European Union's Common Agricultural Policy for 2023–2027 introduces a major shift toward decentralized governance, granting Member States greater flexibility to meet shared socio-economic and environmental targets through unified National Strategic Plans. Key features include integrated Pillar I and II interventions, result-oriented annual reporting, mandatory eco-schemes, and digitalized satellite monitoring. Despite high expectations, Bulgarian and international research on the practical implementation challenges of this model remains scarce due to data gaps, a short execution experiences, and shifting political focus toward the EU Green Deal and regional geopolitical crises. This book chapter addresses this research gap by providing an initial assessment of the challenges surrounding the CAP New Delivery Model within the Bulgarian context. A three-stage qualitative methodology was employed: an autoethnographic summary of the authors' direct experience in developing Bulgaria's Strategic Plan and SWOT analysis; 15 face-to-face in-depth interviews conducted in 2025 with institutional managers, agrarian producers, and independent experts; and a subsequent 7-expert Focus Group in 2026. By analyzing preparation, implementation, and monitoring dynamics alongside future shifts toward a National and Regional Partnership Plan, this study outlines critical strategic directions to optimize public interventions and stakeholder coordination for the next programming period.

Keywords: New Delivery Model, EU Green Deal, CAP reforms, Strategic Plan, National and Regional Partnership Plan, Bulgaria

INTRODUCTION

The New Delivery Model of the Common Agricultural Policy (CAP) of the European Union (EU), implemented in 2023-27, has significantly changed the rules, giving EU Member States more flexibility to achieve the common socio-economic

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and environmental objectives of the Union (EU Regulations, 2021). The new model has several essential features: each Member State develops a single Strategic Plan, including direct payments (Pillar I) and rural development (Pillar II); there is a focus on monitoring results, with annual progress reporting; greater autonomy is given to design interventions adapted to national conditions to achieve the common objectives of the Union; higher environmental and climate standards are prioritized, including mandatory eco-schemes in Pillar I to incentivize sustainable practices; and reporting is improved through a digitalized monitoring system and the use of satellite data.

Despite the significant changes and high expectations, however, in Bulgaria and internationally, there is almost no research on the progress and challenges of implementing the New Delivery Model of the EU CAP. The few publications in this area (Azcáratea and Folkeson, 2020; Bachev *et al.*, 2026; Beluhova-Uzunova, 2025; Blagoeva and Ignat, 2019; Cagliero *et al.*, 2021; Dell'Unto and Cortignani, 2026; EUROPEAN COMMISSION, 2025a; Isbasoiu and Fellmann, 2024; Lovec *et al.*, 2020; Matthews, 2025; Rouillard *et al.*, 2026; Tools4CAP, 2026) analyze the main features of the model, highlight differences compared to past "models", present expected results of implementation, or make assessments regarding individual aspects such as changes in the administrative burden, impact on certain sub-sectors and ecosystems, etc. The reason for the absence of publications on this topic is the "short" period of implementation of the new model and the lack of sufficient "reported" data on the results of its implementation. Other important reasons for this are the redirected interest in the new Green Deal of the EU and the likely effects on the agricultural sector, and the problems related to the Covid epidemic and the war in Ukraine, and more recently the debates related to the agreement with the MERCOSUR bloc, and the proposal to integrate the CAP into a new National and Regional Partnership Plan (EUROPEAN COMMISSION, 2025b).

This chapter of the book makes an initial attempt to identify the challenges related to the implementation of the CAP New Delivery Model in Bulgarian conditions and to outline the directions for improving the design of public interventions in the next programming period.

RESEARCH METHODOLOGY

The study includes three stages, each of which uses a specific research method. First, a summary of the experience of the authors, who are direct participants in

the first stages of developing the Strategic Plan, and specifically in conducting a situation analysis and SWOT analysis, initial consultation with stakeholders and experts, carrying out the strategic orientation and formulating the needs for public intervention, is made. Based on an in-depth analysis of the approved Strategic Plan and its preliminary assessment, a general characteristic of the preparation of the Strategic Plan in Bulgaria is made.

Then, in-depth interviews are conducted with managers and leading experts from the Ministry of Agriculture and Food (MAF), and the Paying Agency, heads of associations of agricultural producers and eco-organizations, and researchers and independent experts who actively participated in the strategic planning process. The interviews were conducted in the period May-June 2025. and included 15 participants – 5 from the MAF, 2 from the Paying Agency, 4 from main agricultural producer organizations, 1 from eco-organizations, 2 independent experts and 1 researcher.

Each of the in-depth interviews was conducted face-to-face or via internet video connection with the expert and lasted about 2 hours. The majority of the interviewed experts agreed to be recorded, while for the rest detailed notes were kept. A common questionnaire was used, which included 15 main questions with a number of sub-questions related to the New Delivery Model, in three main areas:

— Challenges in the process of designing and preparing the Strategic Plan;

— Challenges in the process of implementing the Strategic Plan;

— Challenges in the process of monitoring and reporting on the Strategic Plan.

During the interviews, each of the questions was discussed in depth with the experts, and various opinions related to the management of the sector and the implementation of the CAP in the country were also discussed.

Finally, a Focus Group was held with the participation of 7 leading experts, including 4 from the MAF, 2 heads of main agricultural producer organizations and 1 researcher. With the exception of one participant in the Focus Group, all other experts participated in the in-depth interviews in 2025.

The Focus Group was held at the Institute of Agricultural Economics - Sofia in March 2026 in a hybrid format, with 4 of the participants present in the hall, and the rest joined via video link. The discussion was recorded and detailed notes

were taken by the moderator and the minutes taker. The Focus Group lasted about 3 hours, discussing 4 main questions:

- How do you see the design and implementation of the National and Regional Partnership Plan, and what challenges and opportunities do you anticipate?
- What specific tools, approaches, or resources would be most useful to support planning and monitoring under the National and Regional Partnership Plan?
- For the upcoming National and Regional Partnership Plan, what objectives and targets do you want to achieve, and how will you select indicators to measure progress?
- How do you see the overall process/coordination of designing these interventions within the National and Regional Partnership Plan?

The summarized results of the three stages of the study are presented sequentially in the following parts of the article.

GENERAL CHARACTERISTICS OF THE PREPARATION OF THE STRATEGIC PLAN

The process of preparing the Bulgarian CAP Strategic Plan was marked by political instability in the country, accompanied by the COVID-19 crisis and the delay in negotiations at the European level (Bachev *et al.*, 2026). The parallel preparation of other strategic documents and plans (cohesion, environmental and others) was also delayed and made coordination and demarcation difficult. It is important to note that the current programming period is characterized by significant changes and reforms aimed at achieving the European Union objectives of improving the sustainability of agriculture and the environmental benefits and effects provided by the sector. The Strategic Plan was designed and developed based on a different strategic approach, which largely concerns its future implementation, rather than the strategic planning process.

The CAP strategic planning period was accompanied by the introduction and development of a special programming document "The Recovery and Resilience Plan". This plan aims to strengthen public support for achieving the EU's common priorities and is implemented in parallel with the Strategic Plan, which requires additional efforts to achieve coherence and complementarity.

Despite the above-mentioned novelties and changes in programming, the MAF managed to complete all stages of strategic planning foreseen in the Strategic Plan Regulation. The discussion of the main elements of the Strategic Plan, including SWOT analysis, needs, priorities, intervention logic, specific interventions and budg*et al*location, monitoring indicators, etc., was largely transparent and open to stakeholder participation. However, there is a view that not all stakeholders were covered by the consultation, and also that the consultation and participation process was rather formal and some of the stakeholders' proposals were not reflected in the Strategic Plan. Stakeholders participated and were informed in thematic working groups, but these working groups were not consistently active, and the rules for decision-making and approval of final decisions were not clearly established and implemented.

Due to the introduction of numerous innovations and the New Delivery Model in the planning process, as well as due to the wider scope of programming (covering 9 specific objectives and 1 horizontal objective), SWOT analyses proved to be more complex and took more time for consultations and discussions with stakeholders and institutions. In this regard, it was decided to divide the SWOT analysis into 3 separate studies, differentiated in relation to the formulated specific objectives of the EU in the field of agriculture, agro-ecology and rural development. The studies conducted were comprehensive and in-depth, with the analytical results achieved significantly exceeding the limits of traditional SWOT analyses. There was a lack of detailed guidance from the European Commission (EC) on what these analyses should focus on, how they should be done, what methodology to follow, how to structure them, what to cover, what to research on the impact of the measures and interventions implemented in the past. As a result, the SWOT analyses conducted did not follow a common approach and the identified results and conclusions were presented in different forms, creating a huge analytical text for summarization.

The participatory approach was at the heart of the consultation and in the final synthesis and definition of needs and priorities. However, many questions arose about how exactly this approach works, how the selection and ranking of needs and priorities is carried out, and how decisions are made. The main challenge in involving stakeholders is that individual farm and sector representatives have different interests and behaviors regarding support and regulation policies, which creates problems and difficulties for the Managing Authority. The lack of tools to

manage these processes and of adequate tools to apply evidence-based criteria when assessing the diverse proposals of stakeholders led to uncertainty as to whether the formulated needs, priorities and intervention logic are the most appropriate and effective.

The participatory approach and the real involvement of stakeholders are crucial in the decision-making process. It is generally accepted that stakeholder engagement is appropriate and useful if there are adequate tools to support decisions and through the provision of relevant analyses, data and evidence. Stakeholders should be involved throughout the prioritization process and participate in the multi-criteria analysis, the formulation and ranking of priorities, and in defining the intervention logic to achieve the objectives. The ex-ante evaluation of the Strategic Plan identified a problem related to the application of the multi-criteria assessment methodology and the determination of the weighting of the criteria (MAF, 2023b). From the applied approach, it can be assessed that the weighting of the sub-criteria and the criteria has not been carried out, which is not indicated as a serious weakness. The sub-criteria are somewhat interconnected, which can also be assessed. The inclusion of an approach to weighting the criteria and sub-criteria is a kind of prioritization of them themselves, before proceeding to the final prioritization and ranking of the different needs.

One of the positive things adopted in the current Strategic Plan is the leading role of the principle of "orienting the policy towards results" (MAF, 2023a). However, this principle is not fulfilled with real content and concrete results. The Strategic Plan includes indicators for results, without having a sufficient number of indicators for objectives related to output and effects. As a result, it will be difficult to assess the achieved results and objectives. The implementation of a results-based approach is characterized by the use of performance indicators that are related to authorized funding, supported area or supported agricultural producers. Such indicators do not allow to assess the effectiveness of the implementation of the policy and the allocation of funds. This is a shortcoming that, if corrected, could significantly increase the effectiveness of the implementation of the Strategic Plan. This will also help monitor implementation, as there will be greater clarity about what is being aimed at and what is expected as results. This will also facilitate the search for solutions and the undertaking of future amendments and adjustments to the schemes, interventions and measures in the plan.

The implementation of the Strategic Plan during the current programming period is also burdened with additional complications, especially in the area of agri-ecology. The implementation of eco-schemes under direct payments and agri-ecological compensatory interventions creates additional difficulties for both the administration and farmers. Farmers are often not aware of which schemes are suitable for them and what are the exact requirements and restrictions that should be respected. Moreover, it is not well-founded and certain that the practical application of certain prohibitions and activities under eco-schemes and agri-ecological interventions will lead to the desired results. In fact, the emphasis in programming and implementation is on the process and activities, not on their results. In fact, the results-oriented implementation model turns out to be focused on the process and actions, while the results obtained are unknown. It is assumed that following certain steps and actions will ensure the achievement of the desired objectives, but when these objectives are not specifically defined, effectiveness is not guaranteed.

It can be summarized that the strategic planning meets to a high degree the requirements and regulations of the EC. However, some of the main needs and wishes of farmers, environmental organizations and other stakeholders have not been taken into account and well-integrated. A dialogue with stakeholders has been held, and the comments and diverse opinions of industry and professional organizations, NGOs and other stakeholders have been taken into account. However, the coordination and inclusion process was not fully open to all stakeholders.

A major weakness of the Strategic Plan is its fragmentation, due to the lack of a comprehensive national vision for the future of the sector and synergy between its individual elements. Insufficient attention is also noted on the efficiency and effectiveness of the implementation of the Strategic Plan. The lack of specific and clear indicators and objectives hinders the assessment of the results of implementation, as well as the justification of subsequent changes to the Strategic Plan. The implementation of current, interim, ex-ante, ex-post and impact assessments is not combined with the implementation of adequate and consistent measures for improvement. This leads to the repetition of some of the existing shortcomings and weaknesses, and failure to implement the recommendations given.

CHALLENGES IN THE PROCESS OF DESIGNING, SETTING-UP AND PLANNING THE STRATEGIC PLAN

The first major challenge in the process of designing, setting-up and planning the Strategic Plan was the New Implementation Model, as it took a long time for all participants (politicians, administrators, stakeholders, etc.) to understand the logic, concepts and procedures, as well as their role and responsibilities in the process.

One of the main challenges identified by the experts during this stage was communication with stakeholders and understanding "what is happening". For a certain period of time, even for representatives of the administration it was difficult to understand what was happening. In addition, there was no established unified methodology for situation analysis, SWOT analysis, needs identification, etc., as well as the introduction of many "new" concepts (AKIS, stakeholder participation, results orientation, etc.). As a result, a variety of "available" data, definitions and approaches were used in the design and planning process, which did not always correspond to modern knowledge in this area. Moreover, the short timeframe for the task led to low quality and ineffective solutions at various levels.

To overcome these challenges, for the first time, different parts of the situation analysis and SWOT analysis were outsourced to leading academic institutions such as the Institute of Agricultural Economics, the Agrarian University and the University of National and World Economy. Some of these analyses were very comprehensive and were based on a variety of data (statistical, reports, studies, experts, etc.) and modern scientific methods for determining the target beneficiaries (e.g. prospective, market-oriented, etc. farms), the relative importance of different factors on competitiveness, guidelines for strategic orientation towards the relevant objectives, etc. In addition, numerous trainings, discussions, coordination, consultations between the participants (including EC staff) and subsequent adjustments were carried out, which supported the process and improved its quality.

Another major challenge during the programming period was the lack of comprehensive information on the effectiveness of the measures implemented in the previous period. Consequently, it was not clear which interventions worked well in the specific Bulgarian conditions and in different sub-sectors, farm types, diverse regions and ecosystems of the country. Many experts highlighted that the lack of information on the implemented measures in the previous period was a major challenge during the programming period. Furthermore, there were not

always authorized instruments to address the identified needs, as the instruments are fixed in the EU Regulation and flexibility is limited.

Another challenge was the complexity of the process, accompanied by the insufficient capacity and experience of the administration to design and manage the CAP instruments. The strategic plan included all policies, as well as EU and national funding, and required the whole sector to be taken into account when identifying a small number of needs. A common sector-wide approach was needed when developing the measures, taking into account all types of interventions to achieve the 10 EU objectives. The merging of Pillar I and Pillar II into one Strategic Plan further complicated the process. For example, direct payments have their own implementation logic, which also applies to market measures with specific rules and procedures (including numerous changes). However, all these interventions had to be included in one document with different rules. The approach taken was "very" novel, especially as regards the design of Pillar I payments, since by definition decoupled direct payments are a safety net for income support, not for achieving specific objectives.

In practice, integration has made programming more difficult, involving all departments of the MAF, requiring more effort and time, as well as close interaction with multiple public agencies, other private and other organizations, stakeholders, etc. This has led to multiple (51) interventions, including some overlaps between Pillar I and Pillar II. For example, in the beekeepers' program there are AKIS measures (training, etc.), and similar measures are also available in the Rural Development Program. Similarly, investments for knowledge transfer can be within one pillar, rather than being distributed according to the rules of two pillars. For example, a specific budget for AKIS can be created in one program and it could be shown where the money comes from, including different sources.

The current Strategic Plan is 1500 pages long, three times longer than the plan for the previous programming period. According to most interviewed experts, there are synergies on paper, but in practice this is only achieved for some interventions, such as support for young farmers in Pillars I and II. Regarding environmental measures, synergies are not yet clear, as there is no improvement, but rather overlap is avoided. However, farmers' access to measures is different, as the eco-schemes in Pillar I and II do not have the same conditions. The only change is that it needs to be specified which intervention and measure contribute to which objectives in

one document. The mode of intervention and the distribution of money remain separate for income support and for achieving the objectives of the previous rural development programme. Therefore, the process of integration of the plan has started, but the integration is not complete and synergy has not been achieved.

The coordination of the general objectives of the CAP and the specific national objectives was and still is another major challenge for Bulgaria. The country still does not have a clear and generally accepted strategy and plan for the long-term development of agriculture. In the past, there were special national programs, for example for small farms and for certain regions such as the North-East, using CAP funds. However, CAP instruments are not always available to meet specific national needs as the instruments are fixed and flexibility is limited. It is also unclear how the overall objectives of agricultural development will be achieved with CAP instruments and other national policy instruments.

Despite the challenges, there is also good experience in this area. For example, the decision for national co-financing to achieve the objectives set by the EC regarding the support of municipalities with a guaranteed budget – this is a national decision, independent of the EC. Some experts point out that the coordination of the EC's technical requirements with the specific national objectives is a significant challenge for the country. For example, under pressure from the EC, Bulgaria set a very large budget for the AKIS system, which was later reduced as it did not meet the needs of the system – the National Agricultural Advisory Service.

A major challenge in the programming process (and also during implementation) is the constantly changing regulatory framework at EU level. For example, the new Regulation including the New Delivery Model was announced in 2018, and the Green Deal was presented in mid-2019. As a result, numerous acts (laws, strategies, etc.) were adopted at the EU level, some of which for agriculture, leading to amendments to the legislation related to the Green Deal. The introduction of a new reform framework on top of the already announced CAP reform caused confusion, difficulties and great dissatisfaction. Moreover, several new EU initiatives, documents, strategies, etc. came without any impact assessments for individual sectors. For example, such assessments are missing for strategic documents such as the Green Deal, the Farm to Fork Strategy, the Biodiversity Strategy, etc., which were announced without prior assessments of the economic, environmental and social benefits.

At the same time, new instructions were given by the EC on how to implement the ambitious objectives of the Green Deal, although they were later not legally binding on the Member States. This compromised the initial idea of the New Delivery Model and necessitated a reassessment of the already specified S, W, O and T. The latter was done during the first update of the Strategic Plan, when the Managing Authority ordered an update of the SWOT analysis, taking into account the changes in the European framework as a result of COVID, the war in Ukraine, etc.

As a result of the Green Deal, additional attention was paid to ecology in the planning without proper justification with a prior analysis, etc. The biggest problems in approving the Strategic Plan were related to the high ambitions of the Directorate-General for Environment and the Directorate-General for Climate regarding agricultural policy and the Strategic Plan of the Member States. In Bulgaria, a major challenge was the Green Deal-related demands of the Ministry of Water and Environment, due to insufficient coordination between the Directorate General for Agriculture and the Directorate General for Environment – a problem that was also taken up by the EC at the national level.

Subsequently, 8 eco-schemes were included in the Strategic Plan without a proper assessment of whether the Green Deal objectives could be achieved practically in the country. For example, no assessment was made of the potential in Bulgaria to increase the areas for support. Formal inter-agency working groups have been set up, but experts from the administration are still not working together, which is a major challenge in Bulgaria. Initially, there was a vision of one eco-scheme for each sector (permanent crops, livestock, arable crops), similar to the old approach of direct green payments, but allowing for greater flexibility. Each sector could decide which practices to include and what goals were achieved with the respective practices (what were the objectives and results to be achieved). This approach was approved by stakeholders, as eco-schemes were new, farmers do not like radical changes, and this approach would allow for easy transition and fine-tuning according to national specificities. However, the political leadership of the MAF changed and a new direction was taken - a package of 9 (initially 10) eco-schemes, which significantly complicated things.

In general, the constantly changing regulatory framework is a major challenge and does not lead to efficiency either for the administration or for farmers. For

example, farmers almost learned what they could do with green payments and this type of payments was abandoned. A new eco-architecture was introduced, which transformed eco-schemes to look like green payments - the old economically vulnerable areas, diversification, landscape features, etc. were transformed into eco-schemes.

In addition, the EC applied different requirements for individual countries – e.g. eco-requirements in Bulgaria and Belgium are quite different. This complicates the process, including planning, scope, monitoring, etc., and distorts the rule of "level playing field" for farmers in different EU countries.

The planning process in the Member States was taking place simultaneously with the discussion of the Regulation in the European Parliament. During the programming period, most of the relevant legislation was not ready. As a result, it was difficult to take into account and incorporate the upcoming new and constantly updated Union regulations. For example, due to the fact that EU environmental standards do not reflect national specificities and due to widespread protests by farmers, the Regulation had to be amended, allowing Member States to make certain derogations and standards (different environmental standards). The process started in March 2024 (published at the end of May), after which Member States went through coordination procedures to amend the relevant standards. However, the standards changed with an older date despite this Regulation, which is not correct and creates problems for planning and implementation.

Therefore, there is a guaranteed budget (compensatory) contributing to environmental management (e.g. environmental investments in agriculture and the processing sector), but reducing GAP requirements compromises the achievement of the Green Deal objectives. Many experts stressed that introducing new reforms and important decisions imposed on Member States without a comprehensive analysis of the likely impact of individual sectors on food security in the EU is a major challenge. Reforms need to be justified and discussed at the national level, not simply published on the EC website and waiting for opinions from stakeholders.

Another challenge in the programming process was the effective involvement of stakeholders. The New Delivery Model made communication with stakeholders more intensive during the preparation and implementation of the Strategic Plan. There is a clear legal procedure, defined by the government, on how stakeholders are involved in the process. Since the Strategic Plan includes all aspects and interventions,

all stakeholders had to be included in the consultations and discussions. The process became more transparent and inclusive, including for smaller organizations that previously (without projects in the RDP) were left out.

All stages of the preparation of the Strategic Plan were discussed in detail with stakeholders in 20 Thematic Working Groups - from preliminary analysis, SWOT analysis, etc. to needs identification. The benefits of the consultations were enormous, as stakeholders knew more, were aware of the analysis, and were involved in the process. The Thematic Working Group for the creation of the Strategic Plan has been working very intensively and has held 13 or more meetings in 2021-22, after which it has evolved into a Monitoring Committee.

At the same time, representatives of different sectors are increasingly demanding diverse analyses from independent (academic) institutions, and have started to think about what is happening in the sector before demanding state intervention or taking collective action.

There were application procedures for participation in the Thematic Working Group and associations had to apply within a certain deadline. However, some stakeholders missed the deadlines and were not included. Furthermore, in some cases it was not clear who represented a certain sector among the many organizations that applied - for example, some beekeepers' associations and some livestock associations claimed to be excluded from the process. Moreover, new farmer organizations and interest groups were constantly appearing, wishing to be included in the process.

The general assessment is that the process was politicized, despite the effective participation of producer organizations and stakeholders. For example, due to a change in the political situation during the programming period, the way in which the Thematic Group worked was changed. Many experts believe that the format allows all stakeholders to participate, but the politicization of the process is a problem. For example, despite many workshops, the details of the Strategic Plan (such as the level of payment for eco-schemes) that the MAF sent to the EC were unknown to stakeholders and participants in the Thematic Working Group.

Currently, in the Monitoring Committee, the opinion of the participants is important and is taken into account to a greater extent by the Managing Authority. All new initiatives and proposals from individual stakeholders are voted on in the Monitoring Committee and if approved, the Managing Authority takes them into account. For example, effective multi-annual support for eco-actions in crops was

not initially foreseen, but after constructive discussions and a positive vote in the Monitoring Committee it was decided that it will be introduced next year.

However, there are still cases where the Managing Authority acts from a position of strength and unilaterally imposes certain decisions or certain "strong" producer organizations exert pressure and influence on decisions. Some proposals from stakeholders (environmental, etc. organizations) are not taken into account and no explanation is given why the proposals made were not accepted. For example, one of the interviewed experts indicated that his association had made 10, and other environmental associations 13, substantiated proposals (including for assessments of the results of eco-measures), but there was no motivated answer as to why they were not taken into account.

Many experts consider that the dialogue in the Monitoring Committee is structured and transparent and that the trust in the body has increased. However, stakeholders external to the Monitoring Committee have not always been included in its work. For example, invitations to workshops are made only a few days before the event, meetings are often organized at inappropriate times and places, etc. Some experts consider that there is a regression and that civil society is discouraged from making proposals, as proposals are not accepted and justifications are never given for their rejection. Stakeholders often blame the Managing Authority for everything, not the EC. This is because when stakeholders send a complaint to the EC, the standard response is that national authorities have decided not to take certain actions.

As a result of all these problems, the "unfair distribution" of support between different sectors, actors and activities continues. The main sectors that continue to be supported are related to the production of cereals and technical crops, while the most vulnerable sectors are less supported. For example, if eco-schemes and the possibilities for their combination are taken into account, arable land is strongly supported, while pastures, permanent crops and vegetable production are insufficiently supported. At the same time, the budget for support to producer associations is very small, and organic livestock farming in Pillar I has a very small budget. Moreover, there is no possibility to apply for organic support with a number of animals, which is a limitation by the EC. However, in Bulgaria, more than 30% of livestock farmers do not have pastures or land, and only 20% satisfy all their needs from their own pastures. Therefore, crop measures do not reach a large share

of livestock farms. In addition, there is a lack of "group" interventions while effective support for livestock farmers' cooperation is needed to increase overall efficiency.

In some cases, due to external pressure, the already approved plan is changed in favor of certain interest groups. For example, during the design period it was decided to lower the ceiling in order to allow more beneficiaries to receive support. However, after one year, the investment threshold for an individual beneficiary of 500,000 euros already approved in the Strategic Plan was increased to 1 million euros.

Many experts believe that the budget and priorities are allocated on a "Let's please everyone" basis and many interventions with a small budget and probably insignificant impact are planned.

Another challenge is related to the orientation of the Strategic Plan towards results. The fact that there are indicators for results and the sector is talking about them is a good step in the right direction - before, it was only about money and who received how much. However, no in-depth impact assessments of the planned interventions have been made in relation to the set objectives and mostly inadequate indicators of results are chosen, such as the amount of funds used, the number of beneficiaries supported, the number of hectares covered by the scheme, etc.

Most experts are convinced that there should be specific and measurable objectives (e.g. quantities of milk produced) and that if they are not achieved, this should be considered a problem. For organic farming, there is an adequate indicator – an increase in area. However, for most measures, there are no such clear indicators of results, and with "imaginary indicators, imaginary results are also obtained".

One of the reasons for the mentioned problem is that there is no reliable (historical, reported, experimental, forecast, etc.) data on real results for a given or group of interventions and proxy indicators are proposed. This is a consequence of the already mentioned challenge that there is no long-term strategy for agrarian development in the country.

Another problem is that it is difficult to predict the likely interests of beneficiaries in certain new measures, and there are often serious deviations between the goals and the achieved results even for proxy indicators. At the same time, no appropriate punishment is provided for the country for ineffective planning and failure to achieve the target indicators.

Some producers and environmental associations call for result-oriented schemes and try to test such schemes, assess the impact, including the willingness of farmers to participate and implement them in practice - for example, in the protection of

biodiversity in pastures. The idea of eco-results is not to tell farmers what to do, but to pay them to achieve certain results, such as maintaining or increasing the number of nests, the number of varieties, etc. However, the implementation of these new approaches requires training for farmers, administration and control bodies, which makes them "difficult" or unacceptable. The same is true for NATURA, where money is given piecemeal and it goes mainly to arable land, while the real biodiversity is in pastures and grasslands. Some experts have highlighted that the EC has not encouraged the choice of adequate result-oriented indicators, such as biodiversity, instead of pasture area.

Another unresolved problem is that when developing policies, especially when formulating specific interventions and schemes, feedback and practical advice from the agencies implementing the CAP have not been coordinated or taken into account. The synchronization of policy development between managing and implementing authorities is very important, especially in the area of monitoring, control and reporting. Therefore, the SWOT analysis had to be broadened and, in addition to the state and development of agriculture and rural areas and the related objectives, focus more deeply on the reality and effects demonstrated and reported by the agencies implementing the CAP.

Last but not least, national compliance with EU regulatory procedures is important. After 18 years of membership, the country's administration is now "less afraid of EC requirements" and has learned to protect its interests without worrying too much if something is not implemented on time or with the expected quality. For example, the ex-post evaluation for the previous programming period was not ready until 2023 (and at the time of the SWOT analysis for the current period) and no sanctions were imposed for non-compliance by the EC.

CHALLENGES IN THE IMPLEMENTATION PROCESS OF THE STRATEGIC PLAN

Most of the interviewed experts indicated that it is too early to make a complete list of challenges related to the implementation of the Strategic Plan, as we are only at the "beginning" of the implementation process. The implementation of the Plan started in 2023 and in the first year, mainly direct payments were applied, with no results yet for 2025. In the last two years, many of the measures actually implemented are from the plan for the previous period.

As of the date of the interviews with the experts, only one report has been prepared and approved by the EC, mainly with the application of direct payments and a few other (e.g., beekeeping) interventions. The second report was completed in February 2025 and no feedback has been received from the EC. According to the experts, a comprehensive assessment of the implementation of the Strategic Plan cannot be made, as most interventions have not yet started. So far, no cases of inconsistent implementation of the CAP and the Strategic Plan in Bulgaria have been officially identified. It is necessary to gain further experience from the implementation of the New Delivery Model and then analyze the results in the process of a comprehensive mid-term and ex-post evaluation of the Strategic Plan.

The main challenge in implementation is related to the fact that this new type of programming and implementation is still being established. It is difficult for both the administration and beneficiaries to understand and adapt to the New Delivery Model, to implement new procedures, to learn through experience, testing and from mistakes. Therefore, any new proposals and discussions related to new reforms in the CAP before the effectiveness of the currently implemented CAP has been assessed are considered inadequate by experts, administrators and stakeholders.

The regulatory framework is constantly changing, which is a challenge for both the administration and farmers. From 2027 there will be new environmental legislation and new guidelines for the development of the CAP, which also causes confusion. "Learning by doing" takes time before demonstrating effectiveness, and new regulations only complicate the process. Many experts believe that consistency and gradual changes are needed, as the administration and farmers have "barely learned the way of working," and new radical changes are difficult to adapt to and have a destructive effect.

Another challenge for the period after 2020 is that in a short period of time the same agents are implementing 3 similar instruments with quite specific rules, related to the completion of the previous Agricultural and Rural Development Programme (which was extended with additional funding), the new Recovery and Resilience Plan, and the start of the current Strategic Plan. This period has been characterized by some experts as "chaos for farmers and for the national administration".

Furthermore, the New Delivery Model required constant training of the administration and farmers, more efforts and people in the administration, intensive communication with stakeholders and additional burden for farmers (challenges

already mentioned in the previous point of the chapter). The implementation of the Strategic Plan has been hampered by insufficient experience and administrative capacity and by the lack of full coordination between the different administrative structures at national and local level.

A major challenge related to the implementation of the Strategic Plan is the limited possibility for ongoing adaptation according to lessons learned or the development of the implementation conditions, such as demonstrated interest in different measures by farmers, dynamics of actual needs, etc. In addition, it is necessary to have the possibility of mechanisms for ad-hod crisis measures in the rural development plan, such as the emergence of bird flu, plague, swine foot-and-mouth disease, consequences of the war in Ukraine, new tariffs from the USA, etc. Initially, only one annual update of the Plan was allowed, and currently a maximum of two, with all changes having to be made during these updates. This is considered insufficient by experts, as often after the introduction of the envisaged measures, adaptation is needed to achieve the planned objectives. Moreover, unlike the previous model (when Member States had some freedom to make small changes), currently all changes have to go through long (3-4 months) negotiations and agreements with the EC. For example, if changes to direct payments are proposed in April and approved by the EC in the autumn, they cannot be implemented in the same calendar year.

The lack of real flexibility also applies at farm level. For example, for permanent grassland areas, it is not allowed to change the grazing plan, as it is determined by the end of May, and the summer can be wet or dry and completely change the status of the pasture. Controls are strict and sanctions are applied, as updating according to changes in the specific situation of the farm is not allowed.

Another challenge is the lack of appropriate result indicators. When the planned result for a given intervention in terms of number of beneficiaries, number of hectares, etc. is not achieved or exceeded, there is a risk of unjustified sanctions by the EC or the need for corrective procedures to redirect resources from other measures. There are many new measures and it is uncertain how many beneficiaries will apply for a particular measure at the design stage of the Strategic Plan, which complicates the work of the MAF and the Paying Agency. For example, there is a very high interest from farmers in the announced risk management measure, which was impossible to predict at the programming stage.

It is particularly difficult to link interventions with different deadlines and dynamics (such as annual direct payments and multi-annual ones from the Rural Development Plan) to the same set of result indicators. The most important problem is that real result indicators are not selected. For example, environmental measures only take into account how many beneficiaries participated, how much money was spent and how many hectares were covered. At the same time, it does not take into account what is really happening and whether there is any effect on the protection of biodiversity and the natural environment.

In fact, the EC allows a deviation of up to 50% as normal for the first two years between the planned and actual indicators. However, the Court of Auditors intervenes when there are large deviations (ruled by the EU Regulation) and requires the development of an Action Plan. In recent years, dramatic changes have occurred in the general environment. In addition, there has been a great interest from farmers in certain measures such as eco-schemes (200-300%).

The application of sanctions by the EC for non-implementation of the Strategic Plan is considered inappropriate by experts. Moreover, in Bulgarian conditions, result indicators usually do not matter, since in case they are not achieved, the administration always finds an excuse, such as "too ambitious goals", "lack of interest from beneficiaries" or other reasons, such as COVID, war in Ukraine, etc. There are parts in the Strategic Plan and the Rural Development Programme that are related to evaluations – a plan for evaluations and a plan on how to conduct these evaluations are prepared. However, this is done pro forma and only minimal evaluations that need to be conducted are included. Moreover, no one pays attention to such evaluations once they are conducted, and rarely are the recommendations taken into account when improving the process.

Currently, in the Monitoring Committee, the opinions of stakeholders are taken into account to a greater extent by the Managing Authority. The initiatives and proposals of the various stakeholders are discussed and voted on in the Monitoring Committee and if approved, the Managing Authority works on their implementation. For example, the lack of multi-annual eco-schemes for grain producers was a significant problem, which put them in a less competitive position compared to producers from other Member States where regenerative agriculture is supported. In Bulgaria, there is only one "ineffective" intervention for sustainable varieties with integrated production, while there are no registered

farmers as integrated producers. For this reason, the planned financial resources have not been used. As a result of a positive decision in the Monitoring Committee, it was envisaged to introduce a multi-annual intervention. However, the problem is still not solved, since the deadline until the end of the programming period is short and maximum effects cannot be achieved in short support periods.

A major challenge in the work of the Managing Authority remains that it often acts from a position of power, imposing decisions unilaterally, or that some powerful producer organizations exert effective pressure and influence on decisions. Many experts are convinced that the dialogue in the Monitoring Committee is more inclusive (including for previously excluded small producer organizations), structured and transparent, and that there has been progress in trust and transparency. However, not all stakeholders are still effectively involved due to the large number of producer organizations in certain sub-sectors (where it is not clear who represents the specific sub-sector), the numerous emerging organizations, and the procedures applied in practice (e.g. sending an invitation to a workshop only a few days before the event, organizing very frequent meetings, etc.).

Another challenge is related to the incomplete, contradictory or untimely implementation of provisions related to certain interventions, activities, etc. For example, the newly introduced progressive duties on Russian and Belarusian fertilizers increase costs for producers, while at the same time the Nitrates Directive restricts the use of manure. In another example, last year farmers had to withdraw their applications and resubmit them due to the inclusion of new information from the Ministry of Water and Environment in NATURE. Similarly, there was a major problem for grain producers with the new eco-schemes, especially reducing pesticide use and restoring and preserving soil potential. The first year was disastrous for producers with such schemes, as many were "unfairly" penalized due to a poor regulatory framework. During the implementation of the eco-scheme, a new norm emerged that could not be met by producers, and many farmers were penalized for things that were not specified in the regulatory framework when applying.

Some experts also believe that the relaxation of the initial GAP requirements (cross-compliance and conditionality) significantly compromises the achievement of the Green Deal objectives. However, other experts are of the opinion that it is difficult to comply with the high GAP requirements in times of crisis and high fertilizer prices, especially for slopes, permanent soil cover, etc. Another challenge is

the application of different standards and support levels to different types of farms and producers in different Member States. This compromises the level playing field, the competitiveness and sustainability of farms. Some experts believe that the New Delivery Model offers greater opportunities for achieving results at national level than the previous model, which imposed the same requirements and measures on all Member States, as the specific results for soils, waters, CO2 emissions, etc. are determined by the Member States. However, other experts are of the opinion that in some countries, such as the Flanders region of Belgium, the eco-scheme measures are not ambitious in terms of cross-compliance levels, and it is unclear how they are approved by the EC.

The overall level of support for Bulgarian farmers continues to be lower than in some other Member States. Furthermore, the EC does not apply equal treatment to Member States in terms of audit rules. In Bulgaria, during the period of application of the new Regulation, old audit recommendations from previous programming periods also need to be followed. As a result, multiple audit recommendations from different programming periods are applied simultaneously, and in practice "simplification is impossible".

Moreover, the support budget is unchanged compared to the previous programming period, and inflation has not been taken into account for a long period of time. As a result, the share of CAP direct support per hectare in the total income of farms is decreasing every year. Furthermore, the war in Ukraine has had a huge adverse impact on some sub-sectors, such as arable crops. Over the past 3 years, the country's main grain production sector has been in its most severe crisis since the country's accession to the EU.

Farmers are trying to compensate for the reduction in CAP support per hectare of arable land by participating in eco-schemes. For example, in the cereal sector there is a trend towards a wider adoption of eco-targets and practices. However, farmers need time to adopt, test and adapt to the requirements, share experiences, etc. Some experts point out that in order to receive area-based payments and funds from eco-schemes, farmers have to put in 3 times more effort and costs, while the effect on farms and the environmental impact is unclear. It is right that farmers who want to achieve higher environmental performance should receive higher payments (Pillar I), and there should be a financial incentive to participate. Pillar II attempts to build on Pillar I with 5-year agri-environmental interventions. However, the

problem for some sub-sectors, such as cereals, is that they are not part of the multi-annual interventions. Many farmers apply a variety of green practices, but do not receive financial support to achieve the highest long-term eco-effect.

The main subsectors supported in the country are the production of cereals and technical crops. If we look at the eco-schemes and the possibilities for their combination, arable land is strongly supported, while pastures, permanent crops and vegetable production are insufficiently supported. Some experts believe that the requirement of the "no backsliding" is not respected, as priority is given to arable land, at the expense of pastures, meadows and permanent crops, where most of the biodiversity is concentrated. Similarly, support for organic livestock farming depends on land, while 70% of Bulgarian livestock producers either do not have land or do not have enough land. In addition, the Rural Development Program does not provide mechanisms for ad-hod crisis measures, such as bird flu, plague, swine fever, etc.

Another major challenge for the administration and beneficiaries is the complexity of the application, implementation and control process, as well as the huge increase in costs for training, implementation, adjustments, etc. Some experts even raise the question of whether in some cases the overall benefits exceed the costs for the EC and beneficiaries.

The costs of administering the CAP in the context of the New Delivery Model are significantly higher than in the previous model, due to the need for a complete transformation of processes and systems. In case of non-compliance with the implementation rules or poor performance against the set indicators, the EC imposes sanctions. The costs of reporting and monitoring are higher, given the fact that the EC transfers responsibilities to the Member States. For example, there were large costs for setting up the system and massive investments by the Paying Agency in technologies for compliance with the legislative framework, including implementation, monitoring and reporting. In addition, any change in the regulations is associated with additional costs for updating the system.

At all levels, municipal, regional, Paying Agency, etc., there is an increased administration related to the implementation of a large number (51) of interventions – for the preparation of specific provisions, information, application, admission and correction of errors, monitoring and control, etc. The administrative burden on public institutions has increased significantly, especially in terms of planning,

reporting and coordination between individual agencies. Also, the transition from expenditure control to performance control requires additional financial resources. Currently, control has been increased under Pillar I and Pillar II on area and livestock, with the administration working around the clock, sometimes without days off, holidays, etc.

All public structures have many new obligations in terms of coordination, reporting, control, etc., and for some of them the administrative burden has tripled. Currently, more people are involved in the programming process, monitoring of indicators, communication with the Paying Agency, inter-institutional coordination, etc. In the MAF, before the management was in 1 directorate, and now it is in 4. Preparing annual and biennial reports is very difficult and requires a lot of human resources, which should be focused entirely on this activity. Implementing the plan based on results is more expensive and is associated with more training, as well as more people and efforts. There are employees engaged only with repporting such as preparing reports, responses for the EC, etc. In addition to participants from the Horizontal Department, other staff from all departments of the MAF are involved in this process.

The controls related to the implementation of the various measures are numerous and this hinders the participation of agricultural producers. Last but not least, the Bulgarian administration is working under strong external pressure from the EC and significant internal pressure from protests by farmers and other forms of pressure from various stakeholders.

One of the main challenges continues to be that the individual institutions (ministries) do not communicate with each other. A similar problem existed some time ago between the MAF and the Paying Agency, but not now. Interdepartmental groups have been established, but issues of integral development should be discussed at expert levels. Moreover, technical assistance is used to increase the salaries of the administration, and not to test new forms of intervention in different conditions. It is not clear where this money goes, since there is no longer a Rural Network, which is now managed by the Ministry of Agriculture. Farmers also spend more and more time on administrative activities and less time on field activities. For example, livestock farms are faced with numerous inspections by different authorities and for different measures every year, and they have to prepare more than 20 different reports, forms, documents, etc.

Some of the complications are caused by the EC's requirement for Member States to develop new interventions. For example, it is not clear why there are two investment measures – one on farms and one related to the natural environment. This complicates the application, reporting, monitoring, etc. In the previous programming period, there were integrated projects that were assessed as good by experts. Also, there are currently 3 eco-schemes, which is not necessary. For each scheme, the Paying Agency develops control mechanisms that must be accredited, and controls should be applied. This is associated with a greater burden for the administration and farmers. In addition, as a result of the audit missions, new (2-3) recommendations are usually given and many new (according to experts, "unnecessary") checks requested by the EC are associated with them. The control list is determined by the EC audit missions, not by the Paying Agency.

Some procedures are complex, and the applied approach is assessed as inadequate. For example, in investment measures, applicants are required to carry out unnecessary market surveys, supply offers, etc., instead of using a simplified approach based on standard costs based on a preliminary market price survey, fixed payment per horsepower, etc. Also, it is most likely that the achievement of the EU environmental objectives will be assessed on the basis of aggregated statistical data for Member States, using information on chemical fertilizers, veterinary drugs, etc. imported into the EU and sold, rather than the actual use. Consequently, the real risks and results in the sector based on data on supported areas and beneficiaries - both at EU and national level - will not be taken into account.

Some confusion is further caused by the lack of clear demarcation (and obstacles) that do not correspond to modern business development, as is the case with innovation. For example, if you are a digital enterprise in rural areas, it is difficult to decide where to apply for support – in the Strategic Plan (there is no such support in it) or in other programmes. Therefore, a mandatory contribution from other rural development programmes should also be foreseen. Coordination of the CAP with other policies is required by legislation and is mainly carried out during the preparation of the Strategic Plan. However, there are still a number of overlaps – for example, the Competitiveness and Innovation Programme also invests in rural areas, which is confusing for beneficiaries (small and medium-sized enterprises).

Similarly, there are problems with territorial projects, where the priorities of the Strategic Plan can also be listed. However, the Strategic Plan operates at a

national, not territorial, level, with the exception of roads. In previous periods there was a special priority for the North-West and other regions. Some experts suggest introducing specific priorities for individual regions – for example, the North-West region is mainly pastures and meadows, while the North-East is arable land. In order to cover all needs and regions, more than 50 interventions and schemes are included in the current Strategic Plan. As a result, the money per intervention is small and the impact is insignificant.

A good way to overcome some of the above challenges is to organize annual information campaigns by the MAF in different regions of the country. As a rule, physical contacts are preferred by the majority of agricultural producers. The Paying Agency also organizes online training, but the MAF does not conduct such training, which could increase the scope.

Another major challenge is related to the application of modern digital technologies, such as satellite monitoring, geospatial data and remote checks, which reduce the need for excessive on-site checks and lead to more effective and targeted controls. However, many farmers complain about errors in satellite control, as numerous inconsistencies are found. For example, in satellite monitoring over the past 2 years, a large and increasing number of software errors have been found: last year many hectares were incorrectly counted as burned, because due to the drought the sunflowers looked like they had been burned; this year a large part of the fields were incorrectly counted by the software as "permanent area" (buildings, concrete areas, etc.). The employees of the grain producers' association spend significantly more time after each direct or eco-payment ("at least 2 months") to receive numerous complaints (errors, lack of payments, etc.) from their members, to summarize them, send them to the Paying Agency, seek feedback, monitor for corrections, etc. Moreover, many producers do not monitor the messages in the electronic system and do not appeal within the stipulated 14-day period and as a result are unfairly punished by the authorities.

All stakeholders believe that the Electronic Management System is quite complicated to operate and creates more problems than it facilitates the activity. A generally accessible online training was organized, which aroused great interest from all stakeholders. However, the use of the instructions and the system as a whole is difficult for many farmers. The new electronic system complicates the interaction of farmers with the authorities and increases the administrative burden. According

to some experts, out of a total of 68 thousand farmers, only 8 thousand can submit applications independently without external assistance. Most farmers have to pay, use consultants, etc., which makes the process expensive and difficult. Using the system is too complicated even for younger, more educated and large farmers. For example, the Grain Producers Association is applying for the first time in a call for farmer training, and although the video and documents are not complicated, the online application itself is proving difficult for the director with a PhD.

The digitalization of the process is good for a certain size and type of agricultural activities ("not for everything and everyone"). While it is considered good for investment interventions, for area-based interventions, including electronic signature, etc., it has proven to be a big challenge with the 2-year transition period. Digitalization saves time and costs, for example, for traveling to the municipal office (especially for farmers in remote areas), information, etc. However, the system is complicated and many farmers prefer to go to the municipal agricultural office and consult with the officials about the measure. If the officials say that a measure is difficult to implement and control, farmers usually do not include it in the application.

The implementing authorities are trying to improve the level of electronic communication with beneficiaries. However, a majority of farmers are not familiar with digital tools and are not able to work digitally. In the Paying Agency, everything is digitalized, which is more related to the introduction of new technologies than to the New Delivery Model. The communication related to the implementation of the Strategic Plan is with the Paying Agency. However, the electronic services system is not designed to send notifications and messages to beneficiaries, which makes it difficult to quickly access information. Farmers and beneficiaries are usually not constantly logged into the system and prefer to receive notifications or other information on their smartphones or email addresses. However, the systems are not set up to send signals to correspondents, but instead expect them to find and open the published information. Moreover, the notifications sent by the system, which require some action from farmers, do not provide instructions on how to follow up and what to do.

Another challenge associated with the new system is that a large number of official documents from various public institutions are required from applicants, instead of being provided administratively. Also, various mandatory documents from other organizations are valid only as of a certain date, which requires the collection

of multiple certificates for each new application – for example, a certificate of no liabilities, a bank account, etc. This, in turn, is associated with a huge amount of paperwork, time and costs for beneficiaries.

It is particularly important that public electronic systems do not communicate with each other. For example, the Regional Food Safety Authorities do not have access to the Information System for Plant Protection Activities (they work on another digital platform – the Plant Protection Diary) and farmers have to enter the same information into two different systems. In addition, due to difficulties for many farmers, paper applications are still widely used in practice.

The implementation of the Strategic Plan is associated with a larger number of direct payments and eco-schemes, measures and interventions, compared to the previous period. Therefore, the expected simplification sounds more like a wish than a reality. The implementation approach focuses mainly on result indicators, and the expanded scope of actions and interventions makes monitoring and reporting difficult without ensuring higher efficiency and effectiveness. Spreadsheets and electronic systems have not been created where, once the primary data and records are registered and verified, they can be used in the reporting, without requiring additional manual and extra work.

Many challenges are also related to the collection of data and reporting on the results of the implementation of direct payment schemes, eco-schemes and other interventions. Interconnection and access to different databases and registers by the implementing bodies have not been created. As a result, it is difficult to have the necessary information in a timely manner, which hinders the verification and control process. It also requires constant monitoring of satellite images, without this being facilitated by an embedded machine algorithm that would improve the process.

Some experts believe that one of the reasons for the existing problems is that the Paying Agency has been using the same subcontractor since the country's accession to the EU until now. This is associated with reduced capacity, higher costs, failure to meet deadlines and insufficient use of other available systems (satellite, artificial intelligence, etc.) to improve the process.

CHALLENGES IN THE PROCESS OF MONITORING AND REPORTING ON THE STRATEGIC PLAN

According to the interviewed experts, it is too early to identify all the challenges related to the monitoring and reporting of the Strategic Plan. In 2024, a first

report was prepared for 2023 with a small number of interventions, and a second report was prepared for 2024 without any feedback from the EC by the time of the interview. It is necessary to gain sufficient experience from the implementation of the New Delivery Model and only then to analyze the results in the process of a comprehensive mid-term and final evaluation of the CAP strategic plans.

A main challenge identified by the experts is that the preparation of annual and biennial reports is very difficult and takes a long time and significant human resources (focused solely on this activity) from different departments and agencies. In addition, the decentralization and diversification of the CAP make it "less common" and make it difficult to report and achieve common goals. Moreover, the EC is constantly issuing new reporting instructions to Member States, including additional requirements regarding indicators, information, etc. At the same time, all these new provisions require system updates, testing, information, etc., which leads to errors, confusion and additional costs.

In general, many more people are involved in programming, monitoring of indicators, communication with the Paying Agency, internal coordination. Previously, the management of the programme was in one directorate of the MAF, and now it is in four directorates. It is positive that the different directorates have to work together in common programming, reporting, monitoring, etc. From 2024, the report is prepared by the Paying Agency, which further contributes to better coordination and synergy. The Paying Agency encountered major problems with all the new information systems that had to be implemented, tested, improved, staff hired and trained, communication and coordination implemented, etc.

The new Delivery Model is associated with a significant increase in the administrative burden for public administrations and other institutions, due to the increased need for technical capacity, the more complex reporting and control structure, and higher requirements for inter-institutional coordination. In the Horizontal Department of the MAF, there are employees fully engaged in reporting (preparation of reports, responses to the EC, etc.), and in addition, there are engaged staff in all other departments of the ministry.

The administrative burden on public administrations has increased significantly, especially in terms of planning, reporting and coordination between institutions. The costs of IT systems, staff and training of employees have also increased. The shift from cost control to performance control requires additional financial resources, while

the orientation towards results requires someone to check the results. For example, under Pillar I and Pillar II by area and head of livestock, the administration works 24/7, without weekends, holidays, etc., as the on-site controls and inspections are significant. Some experts also believe that there has been no adequate optimization of the administration responsible for implementation, such as rules, regulations, staff responsibilities, communication and control procedures, etc.

The large amount of information and the requirement for detail that must be processed in the process of reporting on the Strategic Plan is a challenge for the agents involved. There has been a significant increase in the administrative burden both in the planning of target values and in their reporting. All public structures have many new obligations (reporting, control, etc.) and some experts estimate that for some of them the administrative burden has tripled. It is difficult to develop a new system for monitoring and evaluating the impact of the interventions implemented and to link specific result indicators to multiple individual interventions. The development of new systems and tools requires time (development, testing and implementation), experience, financial and human resources, which limits the degree of implementation.

Furthermore, monitoring of the Strategic Plan is difficult due to the lack of accurate data and ineffective evaluation systems. Serious challenges are associated with data collection and reporting on the results of the implemented direct payment schemes, eco-schemes and other interventions. There are no proper interconnection and access to different databases and registers by the implementing bodies. Therefore, it is difficult to provide the necessary information in a timely manner, which hinders the verification and control process. Constant monitoring of satellite images is required, which is not facilitated by a sufficient machine algorithm to increase the efficiency of the process. Automation of data collection and transmission has not been achieved in order to reduce the administrative burden at different levels.

The implementation of the Strategic Plan is associated with a much larger number of direct payment and eco-scheme schemes, measures and interventions compared to previous periods. Therefore, many experts believe that the planned simplification has not been practically implemented. The implementation acceptance focuses mostly on result indicators and due to the wider scope of actions and interventions, monitoring and reporting are much more difficult than before. In addition, there are no efficient systems with adequate tables in which, once the

primary data and records are registered and verified, they can be reflected in the report, without the need for manual and additional work.

Some experts believe that in Bulgaria there is practically no effective system for monitoring and evaluating the implementation of the Strategic Plan. There is only reporting on the absorption of funds. There is a Monitoring Committee, but de facto there is no monitoring and evaluation system. A database system has not been created, including appropriate indicators, baselines and targets, and monitored groups of supported and unsupported beneficiaries, in order to make a proper analysis.

Some experts also believe that there is no intention to develop such an effective system in the country. For example, environmental measures only take into account how many beneficiaries are covered, how much money is spent and how many hectares are supported. However, what is actually happening and whether there is any effect on the protection of biodiversity and the natural environment is not taken into account. In addition, it is necessary to further train farmers and the administration to control and assess the real impact(s).

There are parts of the Strategic Plan and the Rural Development Program that are related to evaluations. A plan for evaluations must be prepared and how these evaluations will be carried out must be planned. In Bulgaria, this is done pro forma and only the minimum evaluations that should be made are included. Moreover, no one pays attention to the evaluations made, and very rarely are the recommendations given taken into account to improve the process. Many experts believe that the indicators used are not essential, since in case they are not achieved, the administration always justifies it with too ambitious goals, lack of interest from the beneficiaries or finds other reasons such as COVID, war in Ukraine, etc.

The fact that indicators referring to the entire sector are included is considered positive by experts, especially at the EC level, including for the evaluation of the result. There are the same set of indicators and the evaluation of the results at the EC level is possible. At the same time, in the 2-year reporting, the indicators are monitored and if there are delays (for example in the second pillar), it is not clear how effectively this new model will work.

In addition, the achievement of the EU environmental objectives will be assessed on the basis of the unified statistical database in the Member States. However, it uses data on imported and sold, and not on the actually applied chemical fertilizers,

veterinary drugs, etc. Therefore, the real risks and results will not be properly measured, only the areas and beneficiaries, both at EU and national level.

Some experts believe that some of the current challenges are a consequence of the lack of communication and synchronization between the managing and implementing authorities at the programming stage, especially in the areas of monitoring, control and reporting. The SWOT analysis and the design of new measures do not take into account assessments of the effects of measures already implemented in the past. Furthermore, monitoring and reporting issues, such as format, indicators, challenges, etc., are not taken into account. There are also no feedback and practical advice from the relevant implementing agencies.

Another important challenge is that the introduction of new technologies and the improvement of online public services are slow processes associated with numerous problems. Many farmers, including young farmers, find the new e-Government System difficult to operate, inconvenient to use and ineffective. Therefore, to make sure that they have done everything right, they have to fill out applications in person at the municipal agricultural office. Training is provided, but even to introduce an electronic signature, it is recommended to go to the municipal help desk.

Along with this, there are many and increasing errors with the applied software related to satellite monitoring of the areas. For example, in 2024, many hectares were reported as burned, because due to the drought, the sunflowers look like burnt fields. In 2025, a large part of the fields was incorrectly reported by the software as "permanent area" - buildings, concrete areas, etc. Moreover, many producers do not follow the messages in the electronic system and do not appeal within the specified two-week period, and are subsequently unfairly punished. The Grain Producers Association spends significantly more time (at least 2 months) after each (direct, eco) payment to receive the numerous complaints (errors, lack of payments, etc.) from the members, to summarize, send to the Paying Agency, to seek feedback, make corrections, etc.

Another challenge is that the e-Services System is not designed to send notifications and messages to beneficiaries, which hinders communication. Most farmers and beneficiaries do not check the system messages daily and prefer to receive notifications on their smartphones or email addresses. It is wrong to expect that farmers and beneficiaries regularly check their notifications and messages from different e-services. Furthermore, the systems do not accompany the notifications

requiring follow-up with guidance on how to handle the information and what needs to be done by the recipients.

Another major challenge is related to EU regulations, contradictions and recommendations, which further complicate the process. For example, for the first two years, the EC allows a deviation of up to 50% as normal between the planned and actual indicators. However, the Court of Auditors intervenes in the case of large deviations ruled by the Regulation and requires the preparation of an Action Plan. For example, there is a high interest in certain measures reaching 200-300% in eco-schemes, and any sanction related to such deviation is inappropriate. Similarly, after each audit mission, a number of recommendations are made and new inspections are imposed, which cannot be cancelled. In fact, it is not the Paying Agency, but the EC that determines how long the checklist is and the current audit missions give 2-3 recommendations each.

According to experts, farmers spend more and more time on administrative activities and less time on farming activities. According to the representatives of farmers, it is necessary to reduce the administrative burden "several times, not by a percentage". For example, currently livestock farms are faced with multiple controls per year by different authorities and for different measures, having to prepare more than 20 different reports, forms, documents, etc. The numerous controls related to the implementation of the measures reduce the interest in participation of farmers, who require a combined inspection once a year.

Regulatory changes also make implementation difficult. For example, in 2024, after the inclusion of new information from the Ministry of Environment and Water in NATURA, farmers had to withdraw their applications, revise them and resubmit them. Similarly, there are many challenges for grain producers related to the new eco-schemes, especially related to reducing pesticide use and restoring and preserving soil potential. The first year of implementation was disastrous with these schemes and many farmers were "unfairly" penalized due to the poor regulatory framework. Farmers were penalized for things that were not stated when applying, because during the implementation of the eco-scheme a new norm appeared, impossible for producers to comply with. All these complications reduce efficiency, increase errors, violations and opportunities for abuse, and increase overall costs. Some of the experts interviewed even questioned whether the benefits outweigh the costs for the EC and the beneficiaries.

NEW CHALLENGES IN THE DESIGN AND IMPLEMENTATION OF THE NATIONAL AND REGIONAL PARTNERSHIP PLAN

A high-level representative from the MAF highlighted that while a single programming document for all EU funds offers more opportunities, it also introduces significant challenges for Member States. These challenges primarily involve coordination, internal communication, and aligning objectives with funding instruments.

While increased flexibility allows for easier resource transfers between policies, it places a heavier burden on national administrations. Instead of a dedicated CAP budget, Bulgaria will receive a general national allocation to be distributed across various objectives. This shift complicates the process; while some funds remain reserved for specific conditions, a portion remains unreserved and available for sectors like agriculture.

The primary goal of this change is to grant states greater flexibility. For example, if rural development is a priority, resources can be mobilized from other policy areas to bolster support. Under this new structure, the Council of Ministers will serve as the central coordination unit. While each ministry will maintain autonomy over its respective chapter in the National Plan, the exact extent of this independence remains subject to final legislative negotiations.

A representative of MAF engaged in CAP programming observed that the current toolkit remains largely unchanged, underlying the process of programming analysis to derive strategies, priorities, and interventions. While the European Commission presents "Partnership Plans" as a new strategic approach, they closely mirror the 2014–2020 Partnership Arrangements.

The expert noted that previous attempts at this level of integration resulted in redundant work, where text was simply copied from Rural Development Programs into general agreements without meaningful coordination. Attempting to manage dozens of ministries and Directorates-Generals within a single document often leads to "complete chaos" rather than efficiency. In their view, the proposed framework is not an innovation, but a return to a bureaucratic process that has historically failed to produce functional coordination.

A leader of a major crop producers' organization argued that Bulgaria's agricultural toolkit is fundamentally flawed due to a lack of strategic vision. For the past two decades, they noted, the MAF has prioritized short-term political

stability over long-term policy. This has resulted in a fragmented system of 60 separate interventions without a clear definition of which sectors they support or how resources are balanced.

The representative warned that merging EU funds across all ministries will only worsen this lack of orientation, making agriculture increasingly dependent on other government bodies. This is particularly concerning given Bulgaria's current unprecedented political crisis in recent years and frequent changes in the government. Without a stable coalition government, there is a severe risk that inter-party struggles will further destabilize the agricultural sector.

A leader of a major livestock producers' organization criticized the current lack of efficiency in the Strategic Plan. They argued that while the SWOT analysis identifies clear deficits, the resulting support measures fail to address them, leading to a "constant outflow" of farms. A primary issue is the lack of targeted support; for instance, treating mountain and lowland farms equally in national top-up payments is described as "absurd."

The representative pointed out that other countries, such as Romania, use their data more effectively—capping support at 200 Animal Units to prioritize the small and medium-sized farms that make up 80% of their sector. In contrast, the current Bulgarian approach has led to a 42% drop in applications for mountain sheep breeding this year alone. They concluded that while the move toward greater national flexibility is positive, it must be used to create instruments that actually reflect regional and structural realities.

A representative from the MAF confirmed that current draft regulations in Brussels point toward a shift where Member States are granted greater freedom, coupled with increased responsibility. Given the projected reduction in financial resources for the post-2027 period—with the CAP budget potentially facing a real-terms cut—the expert agrees that narrowing the policy focus is mandatory.

The representative acknowledged the difficulty of this task, as various stakeholders continue to push for a wider diversity of interventions. However, she suggested that the Commission's proposal to consolidate all programming into a single National and Regional Partnership Plan could improve synchronization and complementarity between policies. Under this new model, EU oversight would shift from tracking how funds are spent to monitoring performance through specific indicators and development stages. Success will ultimately depend on the final

legislative outcome and Bulgaria's ability to reach a national consensus on these new opportunities.

An academician concurred that programming methodologies remain largely stagnant. They emphasized that for the upcoming 2028–2034 period, agriculture must be treated as a macroeconomic priority. While consolidating employment subsidies, tax reliefs, and state conditions into a single National and Regional Partnership Plan is a positive step, it risks inter-ministerial friction as different bodies compete for resources.

The academician warned that political instability—characterized by frequent changes in government and leadership—often disrupts policy foundations laid by predecessors. They stressed that achieving the necessary synergy with departments like the Ministry of Environment and Water, which is already systematizing ecosystem services and "Nature" regulations, will be an "absolute challenge." Ultimately, the success of the new unified document depends on maintaining consistency from initial programming through to final intervention.

TOOLS, APPROACHES OR RESOURCES TO IMPROVE PLANNING AND MONITORING OF THE NATIONAL AND REGIONAL PARTNERSHIP PLAN

A senior representative from the MAF noted that the term "instruments" can be ambiguous, as it may refer to support interventions or tools for improving programming coordination. She emphasized that existing programming tools remain available for use. Furthermore, the representative stressed that political decisions should be justified by preliminary, objective analyses to ensure long-term sustainability. Experimental schemes should be tested prior to the programming phase, using past implementations as a foundation for future strategy. Finally, they highlighted that increased flexibility at the national level allows member states to better determine how to achieve EU goals, which are becoming more generalized.

A key expert from the MAF observed that while strategies should ideally select specific interventions from the regulatory menu, current practice involves selecting the entire menu. They argued that a strategy without clear priorities is not a true strategy. Currently, the MAF has selected 60–70 interventions to appease various stakeholder groups. This inclusive approach, where management avoids refusing any

request to ensure universal satisfaction, results in a significant lack of focus and strategic direction.

These are our core challenges, and I, too, question which instruments can solve them. There is a critical need for prioritization. Our SWOT analysis identifies the specific problems facing agricultural producers, yet our proposed measures fail to address them. For example, labor shortage is a major crisis, yet the current regulations offer no targeted intervention. This omission is baffling—it suggests a failure in either communication or receptiveness at the higher levels. Under the LEADER approach, member states could propose flexible interventions outside the standard regulatory menu for smaller-scale projects. This flexibility should be extended to general planning; while a standard menu is useful, states must be able to design new interventions for proven, specific needs. Currently, low-skilled workers are choosing sectors like retail or gas stations over farming due to better pay and conditions. While the Ministry of Labor and Social Policy offers subsidized employment, agriculture remains excluded. We need a similar measure in our plan. The European Commission's suggestion to "just introduce AI" is unrealistic for Bulgaria, as we currently rank last in the EU for agricultural mechanization and automation. We must secure the machines before we can implement the intelligence.

The European Commission lacks a clear strategy for resolving the ongoing agricultural crisis. Despite three consecutive programming periods, EU competitiveness remains stagnant, largely because factor productivity—the efficient use of land, labor, and capital—has been overlooked in favor of green policies. Rather than offering a rigid "menu" of options, the EC should implement robust impact assessments for its measures. We need a shift in focus: evaluations should prioritize agricultural competitiveness, rural development, and ecological health based on tangible impact indicators, rather than simply monitoring fund absorption and expenditure reports.

Furthermore, current interventions are hindered by excessive administrative burdens and a culture of "administrative fear" stemming from frequent audits. This leads to the imposition of overly complex eligibility conditions that make interventions nearly impossible to implement. To fix this, we must streamline the design of these measures—reducing requirements and accepting a calculated risk of future sanctions in exchange for better performance. The EC should pivot its focus from strict auditing to performance-based results.

A representative of a major producer organization argued that the current policy "toolkit" in Bulgaria lacks a clear objective. They noted that the MAF has prioritized political "calmness" for nearly two decades, resulting in a reactive policy cycle that yields over 60 disjointed interventions. This fragmented approach makes it impossible for specific sectors to identify which interventions apply to them or to understand the state's true priorities. Furthermore, the representative warned that the EU-level trend of unifying funds across various ministries and sectors risks leaving agriculture more dependent on other government bodies, potentially diluting the sector's traditional protections and specialized focus.

I strongly support subsidized employment, but we must rethink our approach to instrument development. Currently, we are moving backward: instead of aligning our finances with national and EU goals, we are letting shrinking budgets and unaddressed inflation dictate our objectives. This inversion is severely damaging our competitiveness.

We must also account for intense geopolitical pressure and trade agreements involving the US, Russia, Ukraine, and China. While the EU's maneuvering with global trade agreements may be beneficial in a broad sense, agriculture is "shooting itself in the foot." A clear example is the imminent arrival of 240,000 tons of sunflower seeds from Argentina—a shipment that directly threatens our domestic sector. Concerns remain high regarding regulatory double standards: while many active substances used in South American agriculture are banned in the EU.

To improve efficiency, interventions should be structured by sector rather than broad policy objectives. Currently, general interventions lead to complex by-laws and inter-sectoral competition, resulting in overly complicated rules that hinder producers. Shifting to strictly delegated instruments for each sector would clarify participation and streamline the work for both farmers and the administration.

Furthermore, we must prioritize digital modernization and automation. The State Fund Agriculture (SFA) should adopt systems for automatic application, approval, and verification, as seen in other member states. Implementing Artificial Intelligence to automatically declare and verify eligibility for a refined list of 3–5 interventions would minimize errors and reduce the manual burden on farmers. Finally, we must acknowledge that future planning remains uncertain. The trajectory of EU "greening," the potential for a "two-speed Europe," and the integration of

Ukraine into the EU are critical factors. By the end of 2027, we must ensure that our instruments are clearly divided by means and backed by sufficient funding.

A leader of a major livestock organization emphasized that interventions must align with local analysis rather than strictly mirroring generic EU policies. They argued that Bulgarian livestock farming cannot be treated identically to the sectors in Poland or Hungary, as farm structures, technical endowments, and land availability differ significantly. For example, while area-based measures are standard, Bulgaria lacks the year-round grazing seen in the UK or Spain. The representative suggested utilizing Omnibus Regulation provisions to allow for headage-based payments (per animal) rather than land-based ones, especially for organic farming. Finally, to ensure the integrity of future planning, they proposed commissioning a SWOT analysis from a prestigious international body, such as a German institute, to prevent domestic political interference and ensure the results are not underestimated or altered by the ministry.

On the remark by the Moderator that the issue is not with the SWOT analysis itself, but with how it is interpreted and applied. Producer Representative responded: If that is the case, the institution preparing the SWOT should also propose the specific measures. There is no regulatory ban on this; it could be a joint effort to link problems directly to solutions. Currently, the Ministry lacks the capacity to design effective measures. Instead, they focus on satisfying various lobbies and "serving the populace" for seven-year cycles. Requests are being granted, but problems are not being solved. In a crisis, the expert—the "firefighter"—should decide the course of action, not the stakeholders. The failures of past years are proof that the current approach does not work.

A senior MAF expert acknowledged that policy often shifts to satisfy the competing demands of all stakeholders, resulting in a lack of strategic focus. While effective solutions are often identified within the Ministry, they are frequently rejected by management or deemed unimplementable by the SFA due to a lack of administrative capacity. The expert warned against shifting decision-making power entirely to external entities, drawing a parallel to recent events at Petrokhan, where state authority was sidelined by NGO influence.

They argued for a stronger state authority that makes decisions based on scientific data rather than reacting to NGO-led protests. To achieve this, the expert agreed that the Ministry must transition to AI-driven automation for applications,

eligibility assessments, and public registers. They suggested that the European Commission should officially require member states to describe how they are using AI and innovation to streamline administrative processes, which would significantly reduce the manual burden on both the MAF and the SFA.

Another representative of the MAF noted that outsourcing program preparation is acceptable, provided there is a broad consensus on the approach. She emphasized that while an objective, independent research organization can provide valuable dialogue and technical insight, political decisions remain a core element of government policy. Ultimately, the Minister and the MAF retain final authority and responsibility for the policies implemented.

A representative of the crop producers' organization agreed that the primary issue is not who conducts the analysis, but how the state applies it. They argued that when the state fails to provide a clear roadmap—for instance, by defining specific goals for grain acreage, crop types, and regional development—the policy process devolves into a struggle between interest groups, leading to inevitable inefficiency. While an independent foreign institute might prevent the initial data from being manipulated, there is no guarantee that the resulting measures won't be distorted later. The representative stressed that sectors are highly adaptable and capable of meeting targets if the state provides a specific, long-term vision—such as clear benchmarks for competitiveness and farm numbers—for the end of the programming period.

A participating academician highlighted a systemic gap in agricultural policy: the transition from "spending-based" reporting to "impact-based" evaluation. She noted that assessments of given programs are often repetitive, relying on static sociological surveys—such as sample sizes and beneficiary counts—rather than measuring real economic change. The expert stressed that beyond SWOT analyses, it is critical to evaluate the economic impact on producer income and financial efficiency, as required by the EC. She called for a unified assessment methodology and integrated regional development concepts, noting that while rural challenges deepen, interventions have remained largely unchanged. Finally, she emphasized that the administration must mandate rigorous impact assessments, whether conducted by scientific bodies or private firms, to ensure tangible benefits for agricultural producers.

The academician noted that while stakeholder interests are vital, Bulgaria must seek a more sophisticated balance, similar to the models found in France, Italy, and Spain. In those countries, the structure of NGO consensus is more robust and

strategically aligned. She argued that the Bulgarian NGO sector needs to evolve so that each agricultural sub-sector can defend its interests while maintaining an overall national balance. A sustainable strategy cannot simply favor large-scale producers while allowing small farms to go bankrupt; instead, policy must recognize that every farm size adds unique value to the economy and requires targeted support to ensure long-term stability.

A representative of the MAF emphasized the urgent need to automate eligibility checks by integrating official administrative registries and databases. He argued that the burden of proof should shift from the beneficiary to the administration, eliminating the need for manual document submission. Furthermore, the representative critiqued current CAP result indicators—such as the number of beneficiaries or hectares supported—as insufficient for measuring true performance. He advocated for a shift toward impact-based metrics, including growth in agricultural added value, factor productivity, and export volume. To enforce these goals, the representative suggested that the EC implement a performance-based financial system that rewards successful outcomes or penalize

Another representative from the MAF concurred, noting that the opportunity exists to address these challenges at the national level. She argued that if the state establishes a specific impact-oriented goal, it has the autonomy to define and implement that objective within its own national framework.

GOALS AND OBJECTIVES TO BE ACHIEVED WITH A NATIONAL AND REGIONAL PARTNERSHIP PLAN AND INDICATORS FOR MEASURING PROGRESS

The focus group participants consider the issue of the availability of specific measures and indicators to be achieved to be fundamental in the strategic planning process. The Ministry of Agriculture and Food also shared that in the current programming period and in previous programming plans there are indicators for result, output and impact. In reality, with the exception of the result indicators, the other two types of indicators remain underestimated and have not become mandatory. In addition, there are no clear rules and conditions on how these indicators are prepared and how they are calculated in the reporting. There is also no mechanism that requires accountability and acts as a binding force for the managing authority to comply with and meet the set target values.

It was noted that impact indicators are essential to obtain a real picture of the implementation and achievements of the implementation of the strategic plan. These are indicators that show to what extent and in what direction the measures and interventions undertaken and implemented contribute to and change the situation in agriculture, rural areas and agroecology. When there are specific and measurable values for output and impact indicators set in advance, when mechanisms are set that require taking action when these planned goals are not achieved and implemented, this will lead not only to higher efficiency and rationality of the implementation of public support instruments, but also to greater objectivity in the assessment of performance.

For the current National and Regional Partnership Plan, it is important for industry organizations and stakeholders to have more specifics and set target values that the National and Regional Partnership Plan sets for itself in the field of agriculture and rural areas. It is advisable to first set and set what target parameters by sectors, industries in agriculture, the viability of rural areas and the fight against climate change are planned to be achieved. The analysis of the situation should reveal weaknesses and problems, diagnose the situation, identify needs from there, and then formulate and set indicator goals.

The intervention logic must be tailored to the needs, but also to the desired and formulated specific objectives that provide guidance and direction in planning. This will be particularly important in view of the fact that it is planned to have a significant resource of funds in the National and Regional Partnership Plan, which will be able to be directed both to support farmers and to rural areas. Experience from recent programming periods shows that the lack of sufficiently clear and specific target indicators reduces the effectiveness and efficiency of strategic plans. Almost all stakeholders indicate that the effects and achievements of the significant financial support are insufficient and expectations are much higher. The reasons are different, but the underestimation and failure to introduce target values defines the possibility of monitoring and evaluating the result in a timely manner and providing more incentives to take action and corrective measures. This is valid for both direct payment schemes and coupled support, as well as eco-schemes. In the current programming period, target indicators are set mainly for results and they contain values for the scope of support, such as the number of beneficiaries, coverage of areas and animals and the amount of public funding provided. Representatives

of agricultural producers express the opinion that they need clearer targeting and distribution of budgets between sectors, which can be done through output target indicators. In addition, the introduction and designation of impact target indicators will allow for monitoring the cumulative and aggregated effect of public policy and support.

According to representatives of the ministry and the competent institutions, there will be challenges to the new format of collecting funding from the agricultural, cohesion and social funds and they are associated with the distribution of funds that are outside the ringfenced. Certain priorities must be addressed and their provision falls within the funds that are not ringfenced. The new model also suggests certain opportunities that come in the line of better focusing on supporting and developing agriculture. Support for non-agricultural practices and infrastructure in rural areas is planned to be financed through structural and cohesion ringfenced, which will allow for better demarcation in the planning and implementation of the National and Regional Partnership Plan. Rural policy should be better integrated into territorial regional policy, but this change may lead to risks of reduced funding for these areas. Rural areas in Bulgaria itself contribute to a greater extent to the formation of the budget for less developed regional fund, but it may turn out that in the actual distribution of funding under the regional interventions, those areas may appropriate less funding. The predetermined minimal 10% allocated to those areas is underestimated and uncertainty what will be the real envelop for rural interventions is a weakness. In order to prevent such a case, it is appropriate to prepare a new territorial typology classification, which to resemble the EU territorial structure divided into - predominantly urban, intermediate and predominantly rural areas.

PROCESS AND COORDINATION OF THE DESIGN OF INTERVENTIONS IN THE NATIONAL AND REGIONAL PARTNERSHIP PLAN

Certainly, the representatives of the competent institutions responsible for the programming and implementation of the CAP foresee some change in the design of planning under the NRPP compared to both the current and previous strategic plans. One of the changes is related to greater flexibility in the design of the various measures, as well as in the distribution of funding. This is especially true for degressive area income support. The perennial issue in the implementation of direct

payments concerned internal and external convergence. There were significant differences in the amount of direct payments per area between individual countries, which was considered a certain inequality. In addition, the uneven distribution of direct payments between farms leads to unequal chances for farms to increase and achieve competitiveness and sustainability. This is especially true for the Single Area Payment Scheme (SAPS) model, which is pointed out as the main reason for the distortions in the presentations of individual sectors.

The announced proposal for a Regulation on the NRPP shows that there is a significant simplification in the strategic planning process. One of the most work intensive and time-consuming stage of this process, which concerns the preparation of SWOT analyses turns out being not obligatory. This will save significant time for managing authorities and give them flexibility to arrange what type of research they need. On the other hand, it definitely raises questions related to the mechanisms for identifying needs and assessing the results out of implementation of the current Strategic Plan. There is no clearance among the representatives of the Ministry of Agriculture on what should be the approach to identifying needs and to set up priorities. There is rather a perception that analyses are indispensable, but how they will look like and whether they should include only recommendations or also comprise the derived needs is not specified and there is no prevailing opinion. It is deemed that the analyses should contain not only a study and diagnosis of the situation in the sector, but also to reveal the impact and results out of implementation of the current interventions and measures fulfilled in the Strategic Plan.

It is definitely shared by stakeholders that one of the weaknesses of programming is achieving synergy between different policy areas. According to representatives of the Ministry of Agriculture, there are very few good examples where synergy and positive externalities have been achieved. The reasons are different, but the main one is that the managing authorities of the individual operational programs are different ministries and each of them focuses on fulfilling its goals, objectives and measures planned for implementation. In addition, one of the conditions for the functioning of the operational programs before and in the current programming period was related to the introduction of demarcation. This meant avoiding situations of receiving double funding for the same activities under different operational programs, which was achieved by determining the scope in advance. The new programming structure to some extent provides prerequisites for achieving higher synergy, but expectations

for this to happen are not great. The opportunities for obtaining synergy within the NRPP exist, they should be used, but synergy should be sought much more in other public programs – competitiveness, environment.

According to the Bulgarian case, coordination between regional actors is not expected to be a serious challenge. Difficulties and delicate situations will exist mainly in the coordination and consultation of program planning between different agricultural industries and types of producers. From the observed experience in recent years, it is very difficult to reach consensus and agreement on a number of decisions mainly related to the design of interventions and intervention budget breakdown. A certain coordination issue is expected to arise in the programming of cohesion measures. The Cohesion Fund is expected to cover both public interventions for rural development and for all other regions. At the moment it is not clear how this will be done and whether the Ministry of Agriculture will remain as the managing authority of rural development policy. Certainly, if an approach is chosen in which regional policy is managed entirely by only one managing authority (Ministry of Regional Development), which would also include rural development policy, this could lead to certain setbacks. The ministry representatives in the focus group shared that it is not inappropriate for territorial policies to be coordinated and then implemented by the Ministry of Regional Development, but emphasized that the main issue is related to their financing.

CONCLUSION

This first-of-its-kind in-depth study of the application of the EU CAP New Delivery Model in Bulgarian conditions found that the challenges in designing, implementing, monitoring and reporting the Strategic Plan have been significant. At the same time, the expected positive results from the implementation of the model are unlikely to be achieved, due to the imperfect and dynamic regulatory framework, the lack of a national strategy for the development of the sector, and the multitude of ineffective solutions at the national level, and the increased difficulties and costs for the implementing administration and multiple beneficiaries.

A new major challenge is related to the recently announced fundamental reform of the EU CAP, the uncertainties about its practical implementation, and the likely difficulties in protecting sectoral interests. This requires further expansion of the research on the various challenges, results and lessons related to the development

and implementation of the current Strategic Plan, as well as the new opportunities and likely challenges that the National and Regional Partnership Plan raises.

To improve the effectiveness of such studies and assessments, close cooperation and exchange of information and opinions among researchers and independent experts, representatives of state and European institutions participating in the process, and broad inclusion of various categories of beneficiaries and interest groups - farmers, producer associations, agents in food chains, eco-organizations, etc. are particularly important.

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