



Republic of Bulgaria  
ECONOMIC  
AND SOCIAL COUNCIL

**OPINION**

**of the Economic and Social Council of the Republic of Bulgaria**

**on**

**"Strategic Plan for Agricultural and Rural Development for the period 2023 - 2027"**

(developed by own-initiative)

**Sofia, February 2022**

The Activity Plan of the Economic and Social Council for the first half of 2022 includes the preparation of an own-initiative opinion on a "Strategic Plan for Agricultural and Rural Development for the period 2023 - 2027"

The preparation of the opinion was assigned to the Commission on Sustainable Development, Agriculture, Environment and Regional Policies and the Commission on Macroeconomics, Budget and Finance. The Commission on Sustainable Development, Agriculture, Environment and Regional Policies and the Commission on Macroeconomics, Budget and Finance was appointed as the leading commission for the preparation of the draft opinion and Nataliya Shukadarova – a member of the Economic and Social Council from Group I.

The draft opinion was adopted at a joint meeting of the commissions on 15.02.2022.

At its Plenary Session held on 28.02.2022, the Economic and Social Council approved this opinion.

## ABBREVIATIONS USED

GDP	Gross Domestic Product
CLLD	Community-led Local Development
GAECL	Standards for good agricultural and environmental condition of the land
EGP	European Green Pact
EAFRD	European Agricultural Fund for Rural Development
EC	European Commission
EP	European Parliament
EU	European Union
EAGF	European Agricultural Guarantee Fund
SMR	Statutory Management Requirements
ESC	Economic and Social Council of the Republic of Bulgaria
MA	Ministry of Agriculture
HIIBY	National Recovery and Sustainability Plan
NAAS	National Agricultural Advisory Service
CAP	Common Agricultural Policy
RDP	Rural Development Program
KISA	Knowledge and Innovation System in Agriculture
SPARD	Strategic Plan for Agricultural and Rural Development
SWOT	Analysis of Strengths, Weaknesses, Opportunities and Threats

## **1. GENERAL CONCLUSIONS AND RECOMMENDATIONS**

- 1.1. ESC notes the delay in the European legislative procedure for the adoption of primary and secondary legislation concerning the reform of the CAP for the period 2023-2027. The delay and the existing ambiguities regarding legal acts placed a serious challenge to some Member States for the deadline of 01.01.2022 for the presentation of the CAP Strategic Plans.
- 1.2. In this regard, ESC recommends, despite the missed deadline, to pay sufficient attention to the preparation and completion of the national Strategic Plan, so as to ensure the quality and effectiveness of the instrument for implementing agricultural policy in the coming years.
- 1.3. ESC considers the National Strategic Plan for Agriculture and Rural Development (NSPARD) as a key tool for achieving the objectives of the CAP. To deliver results, this instrument should have a stable structure and clear priorities balancing the three pillars of sustainability - economic, social and environmental.
- 1.4. In order to achieve the goals of the intervention strategy, ESC considers that it is necessary for the SPARD to have sufficient resources and to be used in combination with other sources of funding - at European and national level. In this regard, ESC also supports a more ambitious rate of national co-financing to the EAFRD budget.
- 1.5. ESC recommends that in determining the national policy for the agricultural sector to rely on the economic principle of planning. Respectively, the policy should be aimed at creating, strengthening and maintaining viable, competitive and market-oriented agricultural farms. At the same time, ESC emphasises the importance of support for small and family farms, which create employment and livelihood for the rural population.
- 1.6. Taking into account the final phase of preparation of the National Strategic Plan for the period 2023 - 2027, ESC found a relatively good participation of stakeholders in the preparation and planning of the SPARD. Nevertheless, ESC emphasises that to conduct

constructive and effective work on the strategic document requires full transparency of actions by the MA and clear representation by civil society organisations.

- 1.7. Noting the efforts made to prepare three SWOT analyses prior to the preparation of the SPARD, ESC reports the use of divergent output data in the individual components, leading to distorted identification of needs and prioritisation, and ultimately to inappropriate planning of intervention strategy. At a later stage, the analytical part of the Strategic Plan was partially improved through the preparation of complementary analyses aimed at focusing and structuring support for individual interventions ("Analysis of the ceiling and progressive reduction of payments for the purposes of the CAP Strategic Plan for 2023-2027"; analysis of the "Structure of agricultural farms in the Republic of Bulgaria").
- 1.8. A novelty in the implementation of the Common Agricultural Policy for 2023-2027 is the obligation of the Member States to include in the Strategic Plans voluntary schemes for climate, environmental and animal welfare to be implemented by the farmers. These are the so-called eco-schemes, funded by the EAGF. In view of a stable budget, which is regulated at European level for the implementation of eco-schemes, ESC recommends easily accessible and financially attractive interventions for farmers.
- 1.9. Also, a novelty in the reformed CAP 2023 - 2027 is the implementation of the so-called, social conditionality, which links the receipt of support from European agricultural funds with compliance with nationally applicable working and employment conditions. In this regard, ESC recommends an ambitious information and awareness campaign among farmers, before the implementation of the sanction mechanism under the preconditions in the social sphere from 01.01.2025.
- 1.10. ESC takes into account the national policy for balanced distribution of funds between agricultural farms by introducing ceiling on direct payments. Nevertheless, in order to avoid negative consequences on employment, ESC emphasises the need to use the regulated possibility of accounting for labour and before applying the ceiling of payments to deduct the actual costs of wages, social security and taxes related to employment.

- 1.11. Continuing the policy for balanced distribution of EAGF funds, ESC supports the implementation of the intervention for "Complementary redistributive income support for sustainability" for all small and medium-sized agricultural farms in various industries. ESC considers it appropriate to finance the intervention by allocating 7.5% of the budget to direct payments and supplementing up to 10% with funds accumulated by imposing a ceiling on payments.
- 1.12. In view of the need to include more ambitious risk management instruments in the SPARD, ESC emphasises the importance of insurance premiums and mutual funds financed by the two European Agricultural Funds. In addition, all types of risk management instruments should have a scope that includes risks related to production or income. Targeted measures and campaigns are also needed to increase insurance activity among farmers.
- 1.13. In addition, ESC proposes that the accumulated funds from the imposition of ceilings on direct payments, after supplementing the budget of the intervention "Complementary redistributive income support for sustainability", shall be directed to a Mutual Fund to be activated in case of crises and disasters in agriculture. ESC believes that the establishment and operation of such a Fund is of strategic importance for all sectors of the agricultural sector, as it concerns the survival of farms during years of crisis.
- 1.14. ESC notes as a significant shortcoming in the drafted SPARD the lack of instruments to strengthen the role of women in agricultural activities. One of the EU's specific objectives is to promote employment, growth, gender equality, including women's participation in agriculture, social inclusion and local development in rural areas. Contributing to job creation in rural areas will be considered as an indicator of the impact in this aspect: changes in the level of employment in rural areas, including gender breakdown.
- 1.15. ESC praises the efforts of the MA to determine the district, regional and national representation of branch organizations and to introduce rules in the SPARD (*в оригинала е изписано „СПРЗРСР“, но предполагам, че става въпрос за „СПРЗРСР“*), which

will allow more active involvement of NGOs in the implementation of agricultural policies.

## **2. GENERAL INFORMATION ON THE CAP REFORM**

- 2.1. The regulations of the CAP 2023-2027 reform package were published in the Official Journal of the EU on 6 December 2021: Regulation (EU) 2021/2115 of the European Parliament and of the Council establishing rules for support for strategic plans to be drawn up by the Member States under the Common Agricultural Policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD), and to repeal Regulations (EU) No. 1305/2013 and (EU) No. 1307/2013; Regulation (EU) 2021/2116 of the European Parliament and of the Council on the financing, management and monitoring of the common agricultural policy and repealing Regulation (EU) No. 1306/2013 and Regulation (EU) 2021/2117 of the European Parliament and of the Council amending Regulations (EU) No. 1308/2013 establishing a common organisation of the markets in agricultural products, (EU) No. 1151/2012 on quality schemes for agricultural products and foodstuffs, (EU) No. 251/2014 determining description, presentation, labelling and legal protection of geographical indications for aromatised wine products and (EU) No. 228/2013 for determining specific measures for agriculture in the outermost regions of the Union.
- 2.2. Increasing subsidiarity in the process of drawing up the Strategic Plans allows Member States to analyse their specific situation and needs, to set targets that are realistic in terms of achieving the objectives of the CAP. In this way, it is possible to develop interventions adapted to national and regional conditions. Nevertheless, in order to ensure a level playing field in the EU, it is appropriate to lay down a common framework and rules on the structure and content of the CAP Strategic Plans.
- 2.3. In the new approach to implementing the CAP, as a way to improve the quality of implementation, the focus shifts from meeting specific requirements to meeting

objectives and achieving results. The new implementation model seeks to achieve greater EU objectives through strategic planning, more general policy interventions and common performance indicators.

2.4. The Strategic Plans Regulation sets out the principle of equality between women and men as an important instrument for the integration thereof into the CAP. In this context, particular emphasis should be placed on promoting the participation of women in the socio-economic development of rural areas, paying particular attention to agricultural practices and promoting the key role of women. Member States shall assess the situation of women in agriculture and take action in their CAP Strategic Plans to address the challenges. Gender equality should be an integral part of the preparation, implementation and evaluation of CAP interventions. Member States shall also enhance their capacity in the field of gender mainstreaming and in the collection of gender breakdown data.

2.5. The EC Communications entitled "The Future of Food and Agriculture", "European Green Deal", "Farm to Fork Strategy" for a fair, healthy and environmentally-friendly food system and "EU Biodiversity Strategy for 2030 - Ensuring the proper place of nature in our lives", the strategic guidelines of the future CAP set out support for environmental care and climate action and contributing to the achievement of EU goals and targets related to the environment and climate. In this regard:

2.5.1. Member States shall demonstrate, through their CAP Strategic Plans, a greater overall ambition than in previous years with regard to the specific objectives of the CAP in relation to the environment and climate. In their clarifications in the CAP Strategic Plans, Member States shall include the national contribution to the Union's 2030 objectives set out in the "Farm-to-Fork" Strategy and the EU Biodiversity Strategy.

2.5.2. At the heart of the European Green Deal is the "Farm-to-Fork" Strategy, the EU's main food strategy, which reaffirms the drive to transform Europe's food production, trade and consumption. The strategy consists of 27 actions aimed at making the European food system a global standard for sustainability. Food

policy sets specific targets to be achieved by 2030 at the latest, namely to reduce the use of pesticides by 50% and fertilisers by 20% in the EU, to reduce by half the sales of antimicrobials used for farmed animals and aquaculture, and the conversion of a quarter of the total agricultural land into organic production areas. "Farm-to-Fork" focuses on reducing food waste and nutrient loss, and promotes the transition to a sustainable food system that protects food security and provides access to healthy food.

2.5.3. During this transition, efforts need to focus on promoting diversified, sustainable and flexible agricultural practices that help to conserve and improve the state of natural resources, strengthen ecosystems and adapt to and mitigate climate change by adapting thereto of the livestock production to an environmentally acceptable load, minimising dependence on unsustainable resources, including fossil fuel energy, and gradually increasing soil biodiversity and quality. In terms of natural resource management, lesser dependence on chemicals, such as fertilisers and pesticides, is considered particularly useful for the conservation of biodiversity.

### **3. GENERAL REMARKS ON THE NEW CAP CONDITIONS IMPLEMENTATION**

3.1. ESC believes that the contribution of Member States to the ambitious environmental goals in the field of agriculture shall be financially secure, shall ensure the economic stability of farmers and shall not compromise the EU's food security.

3.2. ESC takes into account the concerns of farmers in connection with the results of a number of studies and analyses of the European Green Deal by external institutions. The published studies show a significant reduction in EU GDP, a deterioration in the Union's trade balance in agricultural products and food, as well as loss of markets, while increasing food insecurity globally. To varying degrees for individual agricultural sectors and for individual countries, the reports highlight the reduction in food production, declining incomes of agricultural workers and rising final prices for European

consumers.<sup>1</sup>

- 3.3. In this regard, ESC agrees with one of the main remarks of the United European Agricultural Community that so far the EC has not provided a full assessment of the impact of EGD and its two strategies "Farm-to-Fork" and "Biodiversity Strategy" on Europe's food system and recommends targeted action in this direction.
- 3.4. ESC recognises that farmers are under increasing pressure and that the current agricultural system is often unable to provide purchase prices that ensure adequate coverage of production costs. Climate strategies, such as the European Green Deal, further increase these costs, while not providing effective provisions to compensate farmers for the costs incurred and lost profits.
- 3.5. ESC points out that climate strategies in agriculture can be effective and accessible only if these are implemented in close cooperation with farmers, who are the main participants in their implementation. Without framework conditions for a fair agricultural system that covers production costs and the participation of farmers in the formulation of climate strategies, the reliability of food production, and thus food security in the EU, are at stake.
- 3.6. ESC welcomes the linking of the full receipt of CAP support with the observance by the beneficiaries of the so-called social conditionality, included in the system of new preconditions and concerning the applicable working and employment conditions. ESC considers it essential that Member States take appropriate measures to ensure that employers' access to direct payments is subject to the conditions for the implementation of applicable working and employment conditions and/or the obligations of employers arising from all relevant collective agreements and social and labour legislation at national and EU level. ESC recommends that the nationally representative social partners in the agriculture sector - employers and workers, be consulted in the process of

---

<sup>1</sup> Report of the US Department of Agriculture <https://www.ers.usda.gov/publications/pub-details/?pubid=99740>  
COCERAL Study <http://www.coceral.com/data/1634212173COCERAL%20F2F%20impact%20assessment%20-%20Prez%20Live%20debate%2023.6.21.pdf>  
Technical Report of the Joint Research Centre <https://op.europa.eu/en/publication-detail/-/publication/65064349-f0dd-11eb-a71c-01aa75ed71a1/language-en>  
Impact Assessment by the Wageningen University <https://www.wur.nl/en/research-results/research-institutes/economic-research/show-wecr/green-deal-probably-leads-to-lower-agricultural-yields.htm>

introducing the system of social conditionality while respecting their autonomy and their right to conduct collective bargaining. Since it is difficult to set up systems at national level that respect the autonomy and specificity of national systems, Member States are allowed to introduce preconditions in the social sphere at a later date.

3.6.1. In view of the fact that social conditionality is a novelty for the Member States, ESC recommends starting a two-year training period from 01.01.2023 with the active participation of the National Agricultural Advisory Service (NAAS), training organisations, industry organisations and trade unions and the introduction of the mechanism for administrative sanctions from 01.01.2025

#### **4. SPECIFIC NOTES ON SPARD**

4.1. Based on the last programming period of the CAP 2014-2020, ESC emphasises that one of the main challenges in the implementation of the Strategic Plan for the period 2023-2027 is the need to simplify and reduce the administrative burden for beneficiaries.

4.2. ESC emphasises that the increased basic requirements for standards of good agricultural and environmental condition of the land and statutory management requirements, which are mandatory for farmers, shall be sufficiently well communicated by the responsible institutions and industry organizations, so that these are clear and understandable for implementation. The system of new preconditions links the full receipt of CAP support to compliance by farmers and other beneficiaries with increased basic standards (GAECL and SMR) in the field of environment, climate change, public health, plant health and animal welfare.

4.3. ESC recommends voluntary eco-schemes within direct payments, on the one hand, to be sufficiently financially attractive in order to attract farmers, and on the other hand, to be practically feasible and tailored to the specifics of individual industries. Given that climate, environmental and animal welfare schemes are being introduced for the first time in the context of direct payments, some flexibility is provided in terms of planning and

implementation, in particular during the first two years, in order to enable Member States and farmers to gain experience and ensure smooth and successful implementation. The flexibility provided under the Strategic Plans Regulation is also dictated by the requirement that at least 25% of Member States' direct allocations be set aside for each calendar year from 2023 to 2027 for eco-schemes.

- 4.4. Under eco-schemes, only payments covering commitments that go beyond the relevant statutory management requirements and standards for good agricultural and environmental condition are provided. The eco-schemes in the Strategic Plan are aimed at improving soil organic matter and preserving soil fertility, reducing pesticide use, improving soil management, preserving biodiversity and improving biodiversity in forest ecosystems, switching to organic farming, etc. ESC believes that higher ambitions should be set for low-intensity agricultural practices such as conservation and integrated agriculture.
- 4.5. ESC recognizes the need for a serious and systematic awareness-raising and training campaign to provide knowledge and information to farmers. This will help them feel able to meet the new environmental challenges, while simultaneously increasing the opportunities for progress and results on the goals and ambitions of the EGD.
- 4.6. In order to ensure a fairer distribution of income support, ESC notes as effective the mechanism for setting a ceiling on direct payments, the so-called payment ceiling. Member States are responsible for ensuring the targeted distribution of direct payments and for strengthening income support for those most in need.
- 4.7. Nevertheless, in order to avoid deterioration of labour relations in the agricultural sector and to stimulate the improvement of working and employment conditions, ESC considers it necessary before the implementation of the ceiling of direct payments to deduct from the amount of basic support the income for sustainability granted to a farmer for a given calendar year, all wages related to the agricultural activity declared by the farmer, including taxes and social security contributions related to employment. Salary costs actually spent by the farmer are used to calculate the deductions.

- 4.8. ESC emphasises the usefulness of the application of additional redistributive support for income for sustainability, as an instrument for a more balanced distribution of EAGF support to small and medium-sized farms. Nevertheless, ESC also recognises the need to avoid mistakes and vicious practices from the previous programming period 2014 - 2020 in the application of the redistributive payment scheme.
- 4.9. When financing the intervention "Complementary redistributive income support for sustainability", ESC recognises that it is more useful for small and medium-sized farms by determining the amount of redistributive payment by allocating 7.5% of the budget for direct payments and supplementing up to 10% with funds accumulated from the imposition of a ceiling on payments.
- 4.10. According to the "Analysis of the ceiling and progressive reduction of payments for the purposes of the Strategic Plan for the CAP 2023 - 2027"<sup>2</sup>, prepared by the MA, the option of financing with supplementing of accumulated funds from the application of the ceiling is more favourable for farmers ( which do not fall within the scope of the application of the ceiling on direct payments), as the indicative rate for the basic payment is higher - 105.03 €/ha (compared to 99.82 €/ha in the first option). Farms that will receive a redistributive payment will receive the same total amount of support for the first 30 ha in both options, but in the second option they will also receive higher support for the remaining hectares on the farm for which they are paid more. high base rate. Farms that will not receive redistributive payment will also benefit more from the application of the second financing option for the intervention "Complementary redistributive income support for sustainability", as the base support rate is higher than the implementation rate of the first option (10% from the direct payments budget).
- 4.11. In view of the need to provide effective risk management instruments in the SPARD, ESC notes that Member States, in accordance with their needs assessment, may provide support for various types of risk management instruments, including income stabilisation instruments, in particular: (a) a financial contribution to insurance premiums; (b) a financial contribution to the mutual funds, including the administrative costs of setting

---

2 Analysis for setting a ceiling and progressive reduction of payments for the purposes of the CAP Strategic Plan 2023-2027 <https://agri.bg/files/documents/2022/01/21/analiz-namaleniva-i-tavani.pdf>

them up.

- 4.12. ESC considers that an adequate opportunity to ensure the functioning of the risk management model is the creation of a Mutual Fund, which on the principle of shared funding, will attract funds from the EAFRD, the national budget and farmers. The financing of the Mutual Fund shall be supplemented by the remainder of the funds raised in the imposition of ceilings on direct payments. The Fund shall be a set of instruments and buffer funds to support the agricultural sector in case of crop damage as a result of natural disasters, restrictions on the sale of markets and other adverse circumstances. In case of disasters, the Fund should be activated to provide protection of farmers from bankruptcy.
- 4.13. ESC emphasises that it is imperative to improve access to financial instruments that are particularly important for priority groups, namely young farmers and new entrants with a higher risk profile. In addition, it is rational to promote a combination of grants and financial instruments.
- 4.14. ESC emphasises the need to increase support for young farmers, which should be combined with land access instruments, training and financial instruments to support. National policy should be aimed at attracting and retaining young farmers, as well as intergenerational continuity, thus ensuring the sustainable development of economic activity in rural areas.
- 4.15. ESC notes as a significant shortcoming in the SPARD the lack of targeted support for women in agriculture. Effective measures need to be included to support the key role of women in socio-economic development and rural protection, including improving women's access to land, financial instruments and training. The aim is to promote the employment of women in rural areas, to increase their participation in local initiative groups under the CLLD approach, thus bridging the gender pay gap, improving work-life balance and further prevents the social exclusion of women in rural areas.
- 4.16. The preferential participation of young women farmers in the tenders for renting and

leasing agricultural land from the State Land Fund and the Municipal Land Fund will increase the opportunities for women farmers to access land. In addition, ESC recognises that the support of local social, cultural, charitable, amateur, craft and creative initiatives will improve the quality of life of women in rural areas.

- 4.17. It should be noted that the percentage of national co-financing under the Rural Development Program in the two previous programming periods is at the minimum regulated level. The EAFRD budget for the period 2023-2027 amounts to EUR 1.41 billion (for the period 2021-2027 - EUR 2.04 billion). For comparison for the period 2014-2020 it amounts to EUR 2.38 billion. In order to maximize the implementation of national policies for a sustainable agricultural sector, set out in the long term in the strategy paper and in view of the greatly reduced budget of the RDP for the period 2023-2027, ESC considers it necessary to increase national co-financing for interventions under the EAFRD.
- 4.18. ESC considers it rational to establish guaranteed budgets for individual agricultural sectors within the investment measures of the RDP 2023 - 2027 in order to bring competition for investment support only between farmers in a given sector. The opening of investment measures with a common budget for all sectors puts some farmers at a disadvantage.
- 4.19. ESC supports the inclusion in the SPARD of a targeted investment intervention for digitalisation of agricultural holdings, financed by the EAFRD. Digitalisation is a key prerequisite for increasing the competitiveness of agricultural holdings. Such support would stimulate farms to invest in innovation and new technologies in the digital field, in precision agriculture, in applications and web tools for digitisation of agriculture. This would allow, among other things, the balanced and limited use of fertilisers and plant protection products, contributing to the achievement of the environmental objectives set out in the farm-to-table strategy.
- 4.20. In order to resolve the problems of lagging behind regions, ESC shares the idea of including in the SPARD of appropriate regional interventions related to rural development.

- 4.21. ESC supports the continuation of the policy for the implementation of maximum levels of conditional income support, which aims to focus support on specific and vulnerable sectors. Nevertheless, ESC points out that action is needed to clarify these sectors and avoid fraud and misuse of public funds.
- 4.22. It is also important to maintain the implementation of the transitional national aid in the SPARD, which provides additional support for specific productions in regions with limited livelihoods. Nevertheless, ESC emphasises that it is imperative that the reference periods and years for the implementation of the assistance be updated to the maximum possible in accordance with the applicable European regulations, so as to correspond as closely as possible to the real situation in specific proceedings.
- 4.23. ESC recognises the need for stronger ambition and concrete activities in the SPARD in terms of water resources and irrigated agriculture in the country. Water is a key factor in agriculture and efficient management and water saving is a strategic issue that is becoming increasingly important with climate change.
- 4.24. ESC emphasizes the need to strengthen the role of industry organisations in agriculture in the implementation and enforcement of the SPARD, such as delegation of functions, provision of consulting services, demonstrations, trainings and other. In this regard, as a positive aspect, ESC notes the inclusion in the strategic document of rules and conditions for representation of non-governmental organisations in the agricultural sector, which would facilitate the process of involving industry agricultural organisations in the implementation of the Strategic Plan.
- 4.25. The EC Communication "The Future of Food and Agriculture" identifies knowledge sharing and the focus on innovation as a cross-cutting objective for the new CAP. In this regard, ESC considers it appropriate to strengthen the importance at the national level of the system of knowledge and innovation in agriculture (SKIA), as well as to expand its scope and attract individuals, organisations and institutions that use and generate knowledge in the field of agriculture.

- 4.26. ESC supports raising the knowledge and awareness of farmers and foresters through continuous training, consulting - and knowledge transfer, as well as improving the relationship between science, advisory organizations and business for the successful application of scientific knowledge in practice. It is also necessary to include employees in the planned interventions for knowledge transfer.
- 4.27. ESC encourages the inclusion of measures to facilitate the processes of cooperation and co-operation between farmers. In order to help generate a sufficiently reliable agricultural income and to contribute to the sustainability of the agricultural sector, it is necessary to improve the position of farmers in the value chain, in particular by promoting forms of cooperation involving farmers. and benefit them, as well as by promoting short supply chains and improving market transparency.
- 4.28. ESC also supports the continuation of multi-fund funding for the CLLD local development approach, which has proven its effectiveness in promoting rural development, taking full account of the needs of rural areas in various sectors through its bottom-up approach. ESC recommends in the new programming period to expand the network of local action groups and provide more freedom for self-government, in order to avoid administrative burdens and more active involvement of local communities in the management thereof.

/signed/

**Zornitsa Roussinova**

**PRESIDENT OF THE ECONOMIC AND SOCIAL COUNCIL**