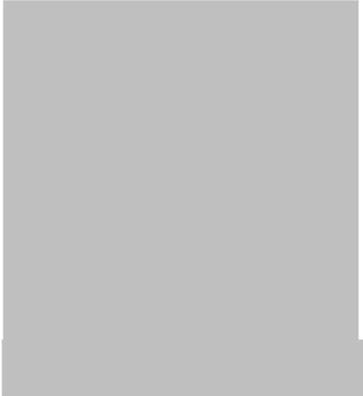


<p><b>MEETING</b></p> <p><b>Director General of AGRI</b> <b>/BG Minister</b></p> 	<p>16 July 2018,</p>
--	----------------------

### Scene Setter

You will meet Mr Rumen Porodzanov<sup>1</sup>, the Bulgarian Minister of Agriculture, Food and Forestry, in the margins of the next Council.

The meeting aims at discussing the Commission's post-2020 CAP proposal, the following issues in particular:

#### **Capping:**

- The Commission is proposing a reduction of payments as of €60,000 and **compulsory** capping for payments above €100,000 per farm.
- According to the big Bulgarian producers<sup>2</sup> the Commission's Impact Assessment does not prove the efficiency of capping, whose inappropriateness for Bulgaria could, according to them, easily be proven in their SWOT.
- The Bulgarian government will probably take this line and argue in favour of **voluntary** capping.
- Animal producers would be keen on a **layered application** of capping, due to which Bulgaria may request exemption of Coupled Income Support (and eco-scheme) from capping.

<sup>1</sup> CV available in Annex 1 – BG Factsheet - pg. 8

<sup>2</sup> Detailed position of stakeholders is available in Annex 1 – BG Factsheet - pg. 7

- Journalists often ask what can the COM do against **artificial splitting** of farms due to capping. The minister might also raise this question.

### **Coupled Income Support (CIS):**

- The post-2020 CAP **proposal** foresees a **budgetary limit of 10+2%** for CIS. Currently, the limit applicable to BG is 13 (+2)%, which they fully utilize.
- The Minister will probably ask to increase this limit to at least its former 13(+2)% level. In fact the stakeholders said in the outreach event that the national position should be an increase to 18(+2)%.
- The rose producers persistently ask access to CIS with the extension of the list of eligible sectors.
- The Ministry's position is unknown concerning the last 2 points.
- BG likely to claim for TNA as an alternative to CIS (see below)

### **Transitional National Aid (TNA):**

- The Minister expressed his **disappointment** via a letter to the Commissioner<sup>3</sup> that the COM did **not** propose the **prolongation of TNA**.
- Supporting **tobacco** would be particularly important for the local Turkish minority, which increases **political** sensitivity of the issue.

DG AGRI, Unit D1

---

<sup>3</sup> See Annex 2

## First key messages

- Following intensive and widespread consultations, the Commission **adopted** its post-2020 CAP proposal on 1 June.
- It is now up to the **co-legislators** (EP and Council) to take their respective positions. Swift agreement would be essential.
- This proposal aims at addressing the numerous challenges set out in the Communication (November 2017), as well as the proposed **cut of the CAP budget**.

### *Reduction of payments and capping*

- Direct payments continue to play an essential role. However, the **distribution of the aid**, in particular in light of the budgetary constraints, must be further **improved**.
- **Capping and redistributive** income support will play an **important role** for a fairer distribution, while keeping jobs on farms and preserving farming activity overall, hence strengthening the socio-economic fabric of rural areas.
  - a. The progressive reduction and ultimate **capping** of direct payments **will be compulsory**. On the other hand, a fairer and simplified system is proposed for taking the costs of all labour into account.
  - b. The product of capping remains available for agricultural support in the Member State concerned and, if kept in direct payments, would be redistributed towards small and middle size farms, young farmers;
  - c. Member States will have to allocate a complementary **redistributive income support** and will be able to grant a **round sum payment** to small farmers.

### *Voluntary coupled support*

- Furthermore, Member States could continue to grant **coupled income support** with **considerable flexibility**. However, to limit

the potential market disturbance in the single market, **certain conditions and limits** are kept.

- Coupled Income Support should address the difficulties that certain sectors/types of farming undergo by improving their competitiveness, sustainability or quality. The targeted sectors/types of farming must also be important for economic, social or environmental reasons.
- The potentially eligible **sectors** are **limited to the current list**. The **only extension** concerns non-food crops, which have the potential to substitute fossil material. This was **inspired by the Europe 2020 Strategy**, which **calls for** supporting the **bio-economy** as a key element for smart and green growth in Europe. It is also in line with the Communication on the Future of Food and Farming, which highlights the importance of the bio economy as a main source of income diversification for farmers.
- The **budgetary limitation** for CIS is indispensable in order to minimize potential market distortion. A **balanced approach** is necessary to ensure market orientation, which is a fundamental CAP principle, while counterbalancing the risk of serious economic, social or environmental problems in certain areas/sectors.
- The proposed percentage (10(+2)%) has been set accordingly. It ensures a common level playing field.

### ***Transitional National Aid***

- In accordance with the end date in the current legislation, the CAP proposal does not provide for a prolongation of **Transitional National Aid (TNA)** after 2020.
- As far as TNA is concerned, please let me recall that it aimed to allow a **soft transition** for the new Member States, whose national support schemes disappeared after their full integration into the CAP. Therefore, it was **decided in 2013** that it has to remain both limited and temporary, with a **gradual phasing out by 2020**.

- With the proposal for a new basic income support for sustainability (BISS), the conditions on the basis of which the MS will be able to grant the basic amount of income support are being streamlined and will be much more homogenous.
- In particular, all MS will have the possibility to differentiate the level of basic support between different regions faced with similar socio-economic or agronomic conditions (which was not the case in the current system for MS applying the SAPS). **This differentiation can play a role that is similar to that currently fulfilled by TNA.**
- The coupled income support that is another powerful tool for targeting the support to specific needs will keep being available for all MS and will be further streamlined.
- **In view of this further homogenisation of the system, it appears to be the right moment for putting an end to the transitional period** during which certain MS have been allowed to use this additional tool to differentiate the level of support between farmers.

## Second key messages (defensive points)

### CAPPING/REDISTRIBUTIVE PAYMENT

#### *The Impact Assessment did not prove that capping is efficient in Bulgaria.*

- The Impact Assessment (IA) tested **different options**, including **voluntary** capping as currently implemented in BG against **compulsory** capping.
- In the case of the IA, capping was only applied to the basic payment and the redistributive payment. **Elements varying across options** (voluntary coupled support, eco-scheme, environmental top-ups...) **were not part of capping, to facilitate comparison** across options.
- The above **explains that the product of capping** estimated in the IA **could be lower than** with the parameters **of the legislative proposals** (reduction applying to all direct payments, including compulsory eco-scheme and VCS and with degressivity between 60 000 and 100.000 EUR)
- To summarise, the IA showed that the combination of compulsory capping, redistribution and degressivity will promote a more balanced distribution of support.

#### *Why capping at every layer, not only on main layer as currently? Why to cap CIS/eco-schemes?*

- One of the driving principles of reduction of payments/capping is the economies of size farmers achieve when getting per-unit payments. This applies to all types of interventions in the form of direct payments whichever main EU objective they contribute to (e.g. environment, generational renewal, competitiveness, etc.).

The overall objective is to limit the total public income support for a single farm.

**In the Bulgarian SWOT it can easily be proved that capping is not appropriate in Bulgaria**

- BG already implements voluntary capping at 150.000 EUR. Considering the baseline (continuation of current capping) estimations indicated remaining imbalances in distribution of support:
  - in BG, 20% of biggest beneficiaries/largest farms would still get 90% of direct payments (worse than the EU ratio, and the highest concentration of support)
  - Salaries deduction is relevant for BG - even if the estimated average employment by capped farm in BG (40 AWU) is somewhat lower than the EU average (47 AWU in capped farms)
- The IA tested capping with salaries deduction and combined with redistribution to smaller farms (e.g. increasing direct payment per hectare by 10% for small farms).
- Against that background, it would appear that capping is appropriate to achieve a better distribution of direct payments also in Bulgaria.

### **How to avoid artificial splitting of farms?**

- The current ‘Circumvention clause’ is taken over in our proposal
- According to Article 60 of HZ Regulation (“circumvention clause”), MS will have to take effective and proportionate measures to avoid provisions of Union law, including reduction and capping, to be circumvented and ensure, in particular, that no advantage (e.g. exemption from capping) can be granted in favour of a farm in respect of which it is established that the conditions required for obtaining such advantages were created artificially, contrary to the objectives of the legislation concerned.
- It is up to the Bulgarian authorities to carry out the controls, assess carefully the suspected cases and to apply the above-mentioned clause
- It is of course possible to split the activity for business purposes. However, if the aim is purely to circumvent the reduction and capping, the support should not be granted by Member States.
- Is such a risk considered big in Bulgaria?

### **Reduction of payments (Article 15) – what is the justification of the threshold proposed – EUR 60 000?**

- In the Communication, farms up to 250 ha have been considered as professional (family) farms, while bigger farms have been considered as "big" farms. A rough calculation consisting in multiplying the average rate of DP/ha (around EUR 250) by 250 ha gives a result of approximately EUR 60 000

## **COUPLED INCOME SUPPORT**

### **Why was the CIS budgetary limit reduced, compared to VCS?**

- It cannot be seen as a reduction due to the following reasons
- The uniform ceiling (10+2%) is an increase compared to the baseline ceiling (8+2%) applied in 2015-2020.
- In the current system, only those MS that fulfilled certain preconditions (potentially 22 MS, from which 18 MS decided to actually apply this possibility) could decide to increase their VCS ceiling to 13(+2)%. For these MS the new ceiling is somewhat lower indeed.
- However, on average, the MS decided to allocate 9(+1)% of their national ceiling for VCS (EU28, also including protein crop).
- Therefore, 10(+2)% appears a healthy and for everyone acceptable compromise, in particular in light of the benefits (e.g. precise targeting according to the needs of a specific sector/type of farming/region) and possible drawbacks (e.g. potential market distortion) of coupled support.

### **Is there a possibility for exceeding the CIS budgetary limit?**

- Exceeding this share will be possible only for those MS that justified the need for similar excess in 2015-2020 and, for which these higher shares were approved by the Commission, implemented VCS accordingly (potentially BE, FI, PT).
- Even in these cases, this option to go beyond 10+2% will be limited at the VCS % formerly approved by the Commission for these MS in CY2018.

### **Which sectors may be eligible for CIS?**

- The list of potentially eligible sectors is the same, but one as in the case of VCS: cereals, oilseeds, protein crops, grain legumes, flax, hemp, rice, nuts, starch potato, milk and milk products, seeds, sheepmeat and goatmeat, beef and veal, olive oil, silkworms, dried fodder, hops, sugar beet, cane and chicory, fruit and vegetables and short rotation coppice.
- The only extension concerns those non-food crops (other than short-rotation coppice), that are used for the production of products that have the potential to substitute fossil materials (excluding trees).

### **Why are certain sectors excluded from CIS?**

- Certain sectors are deliberately excluded from the Commission's proposal, e.g. tobacco, wine: for consistency between the AGRI and SANTE policies purposes (health issues).
- Opening to new sectors could create undesired market disruptions.

### **Could CIS support rose production?**

- Rose production is not covered by any of the sectors and production under CIS. In fact, rose as such is a flower and therefore it does not fall under the categories of fruit or vegetable.
- Besides, the goal of CIS is to support sectors and productions in difficulty, in view of addressing these difficulties. Its objective is not to support niche industries, such as the health/cosmetic industries in the case of the Bulgarian rose oil.
- CIS is therefore not an option for rose.

**'Other non-food crops for bio-economy' is an open list. Could tobacco, which may potentially be used for bio-plastic production, also become eligible?**

- The intention of the legislative proposal, i.e. to encourage bio-economy, is clear.
- In that respect coupled support may target agricultural products used by bio-economy. In principle this could include tobacco, only if used for bio-plastic production.
- Therefore, the eligibility conditions would have to guarantee that no tobacco used by the tobacco industry gets CIS.
- MS could for example introduce eligibility criteria to ensure that CIS is only available to farmers that can prove with contracts/invoices/etc the supply of their products to a processing industry relevant to bio-economy.

**TRANSITIONAL NATIONAL AID**

**What are the reasons for discontinuing TNA?**

- It is a transitional aid.
- All MS will have the possibility to differentiate the level of basic support between different regions faced with similar socio-economic or agronomic conditions.
- This was not the case in the current system for MS applying the SAPS.
- This differentiation can play a role in targeting specific territorial or socio-economic, organic needs, while respecting the principles of the WTO 'greenbox'.
- CIS that is another powerful tool for targeting the support to specific needs will keep being available for all MS and will be further streamlined.

- Possible continuation of external convergence will benefit the MS concerned by TNA.

## **Background**

### **I. Multiannual Financial Framework 2021-2027 – CAP support to Bulgaria**

#### **Overall allocation**

The proposed allocation for the Common Agricultural Policy for 2021-2027 is EUR 365 billion for EU-27 (in current prices). The pre-allocated amounts for Bulgaria are shown in the table below<sup>4</sup>.

Compared to the baseline, **direct payments to farmers** will be moderately cut by less than 4%. Direct payment levels per hectare between Member States will continue to converge (“external convergence”). For all Member States with direct payments below 90% of the EU-27 average, their gap to 90% of that average will be closed by 50% over 6 years. All Member States will contribute equally to bridge this gap. For BG it means a reduction of only -0.7%. [in case the formula for the current MFF was used, BG would have seen a slight increase in their direct payments envelope of +0.2%]

A reduction of direct payments at farm level will be compulsory, taking into consideration the labour costs. The reduction of the direct payments will increase from at least 25% for the tranche between EUR 60 000 and EUR 75 000 to a 100% reduction for amounts exceeding EUR 100 000. The savings from the reduction will remain in the envelope of the Member State in which they originate and used for redistributing agricultural support towards medium and smaller farms or for rural development.

For other schemes financed from the European Agricultural Guarantee Fund (e.g. wine; olive oil; hops; support to outermost regions and small Aegean islands), a reduction of less than 4% to the pre-allocated amounts is proposed in view of the overall allocation for the Common Agricultural Policy. On the other hand, the support for beekeeping is proposed to be increased to EUR 60 million with MS allocations set in the basic act (compared to EUR 36 million set by the Commission Decision currently).

For **rural development**, it is proposed to rebalance the financing between the EU and MS budgets. An increase in national co-financing rates will ensure an adequate level of public support to European rural areas. Currently, the prevailing maximum co-financing rate by the EU for rural development measures is 53% and this is proposed to be reduced to 43%. For less developed regions, like most regions in BG, the maximum co-financing rate of 85% is proposed to be reduced to 70%. However, final co-financing rates also depend on the measures chosen. For example, EU co-financing rates for environmental measures are proposed to become 80% and for areas with natural constraints (ANC's) 65% is proposed. [In the current rural development programming, BG allocates about 50% of its expenditure for less developed regions, 40% for environmental measures and 10% in areas with natural constraints (ANC's).]

---

<sup>4</sup> Percentage change compared to the baseline (i.e. the initial 2020 allocation before flexibility between direct payments and rural development)

Member States will have the option to shift up to 15% of their direct payments to rural development or vice versa, with an additional 15% flexibility towards rural development for interventions addressing climate and environmental objectives or an additional 2% in case of EAFRD support to young farmers.

	Direct Payments		Rural development		Other pre-allocated envelopes		TOTAL CAP	
	EUR million	Δ%	EUR million	Δ%	EUR million	Δ%	EUR million	Δ%
<b>BG</b>	5.552,5	-0,7%	1.972,0	-15,3%	194,5	3,8%	7.719,0	-4,8%

## II. Position of Bulgaria on the reform

Bulgarian Association of Agricultural Producers:

- More equal payment, retaining a strong pillar I (as problems with using pillar II), against upper and lower limits of payments, more freedom in using pillar III funds (less for environment more for modernisation), decreasing cross compliance, more water management, encouraging biofuels, end of dairy quotas and availability of risk management tools.
- Following the adoption of proposal it welcomed the concept of “Small Farmers”, “Young Farmers”; the simplification of the procedures and the measures related to fostering knowledge transfer and innovation; the measures enhancing competitiveness and the “coupled “ option linked to fruits, vegetables and animal products;
- On the other hand, the “capping” and the “degressivity” present a concern, especially for the grain producers in Bulgaria who appeal for a higher ceiling;
- Bulgaria is not prepared that for some of the proposals – for example, the environmental objective and the requirement for association a joint venturing between farmers.

Institute for Market Economy:

- During the first reaction on the overall MFF and NGO sector (Institute for Market Economy and Forum Civil Participation) expressed a radical view for a total elimination of the agricultural subsidies. The latter are considered creating imbalances and overproduction. They argue that elimination of the subsidies would increase the competitiveness of the Bulgarian agriculture.

Center for Agri-Policy Analysis at the Institute of Agricultural Economics (CAPA):

- Keep the two-pillar structure
- Introduce a compensatory payment for income losses based on indices
- Regroup BPS and Greening and link to environmental requirements
- Favors capping
- Raise the threshold for redistributive payment

### III. Degressivity and Capping

Bulgaria applies the redistributive payment since CY2015 and allocates more than 5% of its direct payment envelope to it (7.05% in CY 2016). Although this decision would enable Bulgaria to choose not to apply the reduction of the basic payment/capping in the current CAP, Bulgaria decided not to apply this derogation.

Bulgaria applies a 5% reduction of the basic payment (SAPS) for amounts in excess of 150,000 EUR and 100% reduction of the basic payment (SAPS) for amounts in excess of 300,000 EUR, with subtraction of salaries in both cases.

The current product of reduction/capping is EUR 4.22 million, representing 1.44% of gross BPS expenditure.

With the COM proposal to impose a compulsory reduction to all amounts of direct payments above EUR 60 000 and capping at EUR 100 000;

- 
- In fact, for claim year 2016, 59.1% of the direct payments go to 5.1% of beneficiaries who have a farm size larger than 250 ha.

### IV. Redistributive Payment

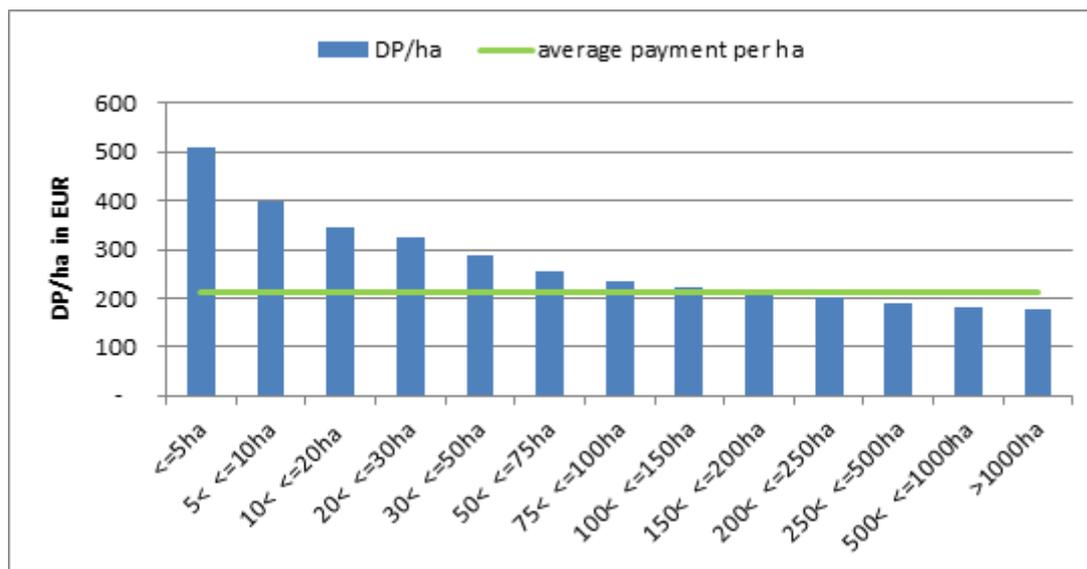
Currently Bulgaria does apply the redistributive payment. In CY2016, Bulgaria provided a top-up of EUR 75.32 per hectare (32.8% of the national average payment per hectare) to the first 30 hectares.

To give an indication of the 80/20 ratio, based on data for CY 2015, 84% of the direct payments are granted to the 20% biggest beneficiaries.

#### **DP per hectare by (physical) farm size based on CATS data for CY 2016**

---

<sup>5</sup> These amounts have a purely indicative character. They are the results of simulations which are not carved in stone as: 1) they are based on a sample (FADN data), 2) they cannot anticipate all the decisions Member States will take in their future CAP Strategic Plans on how to distribute direct support, and 3) because of the criterion of subtraction of all labour (family and salaried) whereby, due to the lack of reliable and representative statistics, a simplified method of calculation is used.



The COM's proposal provides for a compulsory redistributive income support for sustainability (CRISS) to grant a higher payment to the first hectares.

## V. Voluntary coupled support (VCS)

VCS is an important support scheme in Bulgaria as in CY2016, 15% of their DP envelope is used to support 10 measures. The sectors most supported are: Fruit and vegetables (3 measures, 47 mio EUR), Beef and veal (3 measures, 27 mio EUR), Milk and milk products (1 measure, 24 mio EUR).

As from CY 2017, Bulgaria increased the number of support measures from 10 to 14.<sup>6</sup>

Following the Omnibus Regulation, Bulgaria can review its decision for the period 2019-2020 the latest by 1 August 2018.

The aim of the Omnibus was to clarify the existing VCS rules, due to the ambiguity between the Member States responsibilities:

- On the one hand the maintenance condition & quantitative limit (deleted)
- and on the other the 'flexibility of unit' rates.

The Omnibus deleted:

1. The condition of maintaining of the current level of production
2. The limitation/elaboration of the notion of difficulty (because no longer justified)

It newly introduced:

3. The term of 'Fixed areas and yields/fixed number of animals'
4. Optional annual review

## VI. Transitional National Aid:

<sup>6</sup> See more details in Annex 3

Currently, TNA is granted to the following sectors in Bulgaria:

MS	Type of TNA**	Envelope/ Maximum level of support allowed in CY2016 (000 EUR)	Amount paid in CY2016 (000 EUR)	Execution level (% paid compared to envelope)	Number of beneficiaries in CY2016
Bulgaria	Bovine animals (decoupled)	22.952	22.871	100%	5.723
	Sheep and goat (coupled)	19.205	19.056	99%	7.515
	Tobacco (decoupled)	56.389	45.553	81%	41.384

\*\* All TNA relate to a sector (mainly as a decoupled payment on the basis of historic reference, unless specified otherwise)

The share of TNA expenditure compared to total DP expenditure is 12.4%.

## VII. Rose Valley, Bulgaria

The Rose Valley (Bulgarian: Розова долина, *Rozova dolina*) is a region in Bulgaria located just south of the Balkan Mountains and the eastern part of the lower Sredna Gora chain to the south. Geologically, it consists of two river valleys, those of the Stryama to the west and the Tundzha to the east.

The Rose Valley of Kazanlak stretches for 10-12 kilometers and is 95 kilometers long with an average height of 350 meters and an area of 1895 square kilometers.

Respectively, the Kalofer Valley of Roses covers an area of 1387 square kilometers with a length of 55 kilometers and 16 kilometers width.

The valley is famous for its rose-growing industry which have been cultivated there for centuries, and which produces close to half (1.7 tonnes) of the world's rose oil. The centre of the rose oil industry is Kazanlak, while other towns of importance include Karlovo, Sopot, Kalofer and Pavel banya. Each year, festivals are held celebrating roses and rose oil. Leading companies in the health and beauty industry like "TomyShow Cosmetics" have made this region their home and have built their headquarters there.

The picking season lasts from May to June. During this period, the area gives off a pleasant scent and is covered with multi-coloured flowers. The gathering process, traditionally a woman's task, requires great dexterity and patience. The flowers are carefully cut one by one and laid in willow-baskets which are then sent to the distilleries. Tourists are welcome to join the rose-picking process, usually on weekend mornings when special ritual reenactments are organized in villages around Kazanlak.

In September 2014 the European Commission approved Bulgarian Rose Oil («Bulgarsko rozovo maslo») as a new Protected Geographical Indication (PGI).

Annex 1



# **BULGARIA (BG)**

## ***Policy Fact Sheet***

*Last update: 28 June 2018*

<b>CAP POST-2020</b> .....	2
<b>CAP IMPLEMENTATION (2014-2020)</b> .....	3
<b>STAKEHOLDERS</b> .....	7
<b>CV OF AGRICULTURE MINISTER</b> .....	8
<b>EUROBAROMETER</b> .....	9

**Contact person**

████████████████████

DG AGRI – Unit C.1

██████████

## CAP post-2020

---

### BG position

#### General CAP

- Need for a strong, two-pillar CAP, with an appropriate budget.
- Maintain the current CAP components: CMO, DP, RD.
- Need for simplification.
- Increase subsidiarity (concerning planning and controlling the implementation of the CAP measures).
- Favour modernisation and investment measures.
- Encourage generation renewal.

#### Direct payments

- Maintain direct payments.
- Make SAPS available to all MS.
- Maintain coupled support, with greater flexibility.

#### Market/food chain

- Improve the food supply chain functioning, enhance the support to PG and PO to reinforce their position in the chain.
- Adopt measures in favour of the sugar sector (following the end of the quotas) and keep the current tariff protection.
- Realign the level of intervention price for cereals (concern related to imports from the Black Sea region).

#### Other issues

- Need for new crisis prevention and management tools.
- Intervene against land speculation.

Source: *Joint Declaration of the Ministers of Agriculture of the Visegrad Group countries as well as of Bulgaria, Romania and Slovenia.*

[https://intraoate.ec.europa.eu/basis/index.cfm?action=event\\_documents&id\\_request=69918&id\\_event=68311](https://intraoate.ec.europa.eu/basis/index.cfm?action=event_documents&id_request=69918&id_event=68311)

## CAP implementation (2014-2020)

### Financial aspects

<b>Direct Payments</b>	<ul style="list-style-type: none"> <li>• As a result of the MFF/CAP reform, the direct payments for all EU-27 MS were cut by 3.2% compared to the baseline (envelopes in the existing regulation prior to the reform with full phasing-in).</li> <li>• However, BG benefits from the convergence of the direct payments.</li> <li>• The baseline envelope for BG for financial years 2014-2020 is EUR 5 257 million. With the MFF/CAP reform (i.e. external convergence + MFF cut), BG's envelope for 7 years' period amounts to EUR 5 137 million (all amounts in current prices).</li> <li>• BG did not opt for transfer of funds between the pillars.</li> <li>• All abovementioned amounts are before financial discipline that in the case of BG is applied to direct payments as of 1 January 2016. These amounts are also subject to the application of the reduction of payments as of financial year 2016 (Article 11 of Regulation 1307/2013).</li> </ul>
<b>Rural Development</b>	<ul style="list-style-type: none"> <li>• BG's envelope for 2014-2020 set out in Regulation (EU) No 1305/2013 amounts to EUR 2 339 million (in current prices).</li> <li>• The RDP 2014-20 was adopted on 26 May 2015. Despite the slight delay in the start of the programme implementation due to the time of adoption, the RDP 2014-20 had a good absorption and at the end of 2017 about 325 MEUR were disbursed by the Bulgarian authorities, which represents an overall absorption of about 13,7%.</li> <li>• The rather smooth implementation of the programme is due to the improved management and planning of calls. This includes a better management of investment measures and specifically area-based measures through among others simplification of documents for applicants.</li> <li>• Nevertheless, there are some important issues to be tackled in 2017 directly related to programme implementation and the absorption of funds, namely preparation of the new delineation of areas with natural constrains as well as the setup of the new Financial Instrument.</li> </ul>

## IMPLEMENTATION OF THE NEW DIRECT PAYMENTS ARCHITECTURE

<b>Flexibility between pillars</b>	<ul style="list-style-type: none"> <li>• Not applied</li> </ul>
<b>Basic payment scheme</b>	<ul style="list-style-type: none"> <li>• SAPS until 31.12.2020 (with an estimated amount of EUR 83.80 per ha in 2015)</li> </ul>
<b>Green payment (30%)</b>	<ul style="list-style-type: none"> <li>• Permanent grassland: ratio and obligation at national level, ESPG designated only within Natura 2000; no designation of further sensitive areas (optional designation).</li> <li>• EFA: 9 EFA activated. This covers: Land lying fallow;; within the landscape features option: hedges/wooded strips, , trees in line, trees in groups and field copses, field margins; hectares along forest edges without production; short rotation coppice; catch crops; nitrogen-fixing crops.</li> <li>• EFA implementation: Regional and collective implementation not used.</li> <li>• Equivalence not activated Simplification: Bulgaria is not eligible for exemption from the EFA requirement in heavily forested areas.</li> </ul>
<b>Young farmers (up to 2%)</b>	<ul style="list-style-type: none"> <li>• In 2015, 0,47% of DP national ceiling</li> <li>• In 2016, 0,13 % of DP national ceiling</li> <li>• In 2017, 0,16 % of DP national ceiling (% can be reviewed annually)</li> <li>• Payment calculated as 25 % of SAPS rate and paid for the maximum of 30 ha</li> </ul>
<b>Redistributive payment</b>	<ul style="list-style-type: none"> <li>• Yes (since 2014)</li> <li>• Around 7% of DP national ceiling each year from 2015-2020</li> <li>• Without graduation for the first 30 ha</li> <li>• With an estimated amount of EUR 76.69 per ha</li> </ul>
<b>Coupled support</b>	<ul style="list-style-type: none"> <li>• Yes, with a total amount allocated to VCS of 118.636 thousands EUR for 2015. This is 15% of the annual ceiling of which 2% for protein crops support.</li> <li>• In 2015, the largest portion (+/- 34%) is allocated to F&amp;V for an amount of 40.536 thousands EUR</li> <li>• 10 measures</li> <li>• Targeted sectors/type of farming: milk and milk products (1 measure), beef &amp; veal (3 measures), sheep &amp; goat meat (2 measures), F&amp;V (3 measures), protein crops (1 measure)</li> <li>• By 1 August 2016, the BG authorities reviewed</li> </ul>

	<p>their decision on VCS, for the period 2017-2020.</p> <ul style="list-style-type: none"> <li>• The number of VCS measures increased from 10 to 14 (but the envelope still represents 15% of the annual ceiling)</li> <li>• By targeted sectors/type of farming, 2 additional measures were added both in the milk and milk products and the F&amp;V sectors.</li> <li>• The F&amp;V sector still benefits from the largest proportion of allocation (+/- 34%), with 41.035 thousands EUR in 2017.</li> </ul>
<b>Active farmer</b>	<ul style="list-style-type: none"> <li>• Governmental and municipal administrations and divisions of those, added to the negative list.</li> <li>• Entities of the negative list can be taken off the negative list in case: <ul style="list-style-type: none"> <li>- Total amount of DP is at least 5% of total receipts from non-agricultural activities</li> <li>- Receipts from agricultural activities represent at least 1/3<sup>rd</sup> of the total receipts</li> <li>- Agricultural activity registered as principal business in equivalent evidence as an official business register</li> </ul> </li> <li>• Further exclusion under Article 9.3.a and 9.3.b applied.</li> <li>• EUR 3000 (amount of DP) threshold for the exemption from the active farmer's provisions.</li> </ul>
<b>Natural constraint support (up to 5%)</b>	<ul style="list-style-type: none"> <li>• Not applied (even after possible revision as from 2017).</li> </ul>
<b>Degressivity and capping</b>	<ul style="list-style-type: none"> <li>• 5% reduction for the payments above 150.000 EUR</li> <li>• 100% of reduction for the payment above 300.000 EUR Significant increase in the product of reductions from year 2016 (from 2.663 million EUR in 2015 to 6.262 million EUR in 2016). – confirmed by BG.</li> </ul>
<b>Small farmers (up to 10%)</b>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• Payment method used: amount due each year, in accordance with Article 63(2)(a) (FYI: initial notification of BG provided for a lump sum payment, but that decision was revised)</li> <li>• Maximum amount EUR 1250</li> <li>• Rounding up to EUR 500 for amounts due below that threshold.</li> </ul>

**Transitional national aid**

TNA type	Amount decided			Unit rate decided		
	2015	2016	2017	2015	2016	2017
Bovine animals (decoupled)	24 591.75	22 952.30	21 312.85			
Decoupled area payment	0.00	0.00	0.00			
Sheep and goat (coupled)	20 576.00	19 204.50	17 832.75	21.00	21.00	21.00
Suckler cows (coupled)	0.00	0.00	0.00			
Tobacco (decoupled)	60 416.00	56 388.50	52 360.75			

**Implementation 2016**

TNA type	Maximum amount decided (000 EUR)	Amount paid (000 EUR)	Execution %	Unit rate decided	Unit rate paid	Execution %
Bovine animals (decoupled)	22 952.30	22 871.00	99.65%			
Sheep and goat (coupled)	19 204.50	19 056.00	99.23%	21.00	18.12 €/unit	86.3%
Tobacco (decoupled)	56 388.50	45 553.00	80.78%			

## Stakeholders

<b>Bulgarian Association of Agricultural Producers</b>	<ul style="list-style-type: none"> <li>• <u>Organisational structure</u> <ul style="list-style-type: none"> <li>- [REDACTED] - Chairman of the board</li> </ul> </li> <li>• <u>CAP position</u> <ul style="list-style-type: none"> <li>- More equal payment, retaining a strong pillar I (as problems with using pillar II), against upper and lower limits of payments, more freedom in using pillar II funds (less for environment more for modernisation), decreasing cross compliance, more water management, encouraging biofuels, end of dairy quotas and availability of risk management tools</li> <li>- Following the adoption of proposal it welcomed the concept of "Small Farmers", "Young Farmers"; the simplification of the procedures and the measures related to fostering knowledge transfer and innovation; The measures enhancing competitiveness and the "coupled" option linked to fruits, vegetables and animal products;</li> <li>- On the other hand, the "capping" and the "degressivity" present a concern, especially for the grain producers in Bulgaria who appeal for a higher ceiling;</li> </ul> </li> <li>• Bulgaria is not prepared that for some of the proposals - for example, the environmental objectives and the requirements for association and joint-venturing between farmers.</li> </ul>
<b>Institute for Market Economy</b>	<ul style="list-style-type: none"> <li>• <u>Organisational structure</u> <ul style="list-style-type: none"> <li>- [REDACTED] (Chairman Management Board)</li> <li>- [REDACTED] (Chairperson Advisory Board)</li> </ul> </li> <li>• <u>CAP position</u> <ul style="list-style-type: none"> <li>- During the first reactions on the overall MFF the NGO sector (Institute for Market Economy and Forum Civil Participation) expressed a radical view for a total elimination of the agricultural subsidies. The latter are considered creating imbalances and overproduction. They argue that elimination of the subsidies would increase the competitiveness of the Bulgarian agriculture.</li> </ul> </li> </ul>
<b>CAPA</b> <i>(Centre for Agri-Policy Analysis at the Institute of Agricultural Economics, Sofia, Bulgaria)</i>	<ul style="list-style-type: none"> <li>• <u>CAP Post 2020 position</u> <ul style="list-style-type: none"> <li>- Keep the two-pillar structure.</li> <li>- Introduce a compensatory payment for income losses based on indices.</li> <li>- Regroup BPS and Greening and link to environmental requirements.</li> <li>- In favour of capping.</li> <li>- Raise the threshold for redistributive payment.</li> </ul> </li> </ul>

## CV of Agriculture Minister

---

**Mr. Rumen Porodzanov**

Minister of Agriculture, Food and Forestry

	<b>Personal details</b> <ul style="list-style-type: none"><li>• </li></ul>
	<b>Education</b> <ul style="list-style-type: none"><li>• </li><li>• </li><li>• </li></ul>
<b>Professional &amp; Political career</b>	<ul style="list-style-type: none"><li>• </li><li>• </li><li>• </li><li>• </li><li>• </li><li>• </li><li>• </li></ul>
<b>Other</b>	<ul style="list-style-type: none"><li>• </li></ul>

## Eurobarometer

## Special Eurobarometer 2017 (Report 473)

*Do you think that, in the EU, agriculture and rural areas are ... for our future?*

BG	Evolution 2017-2015	EU	Evolution EU 2017-2015	
58%	-16	53%	-9	Very important
31%	+10	39%	+7	Fairly important
3%	+1	4%	+1	Not very important
1%	+1	1%	=	Not at all important
7%	+4	3%	+1	Don't know

*In your opinion, at which level should the following issues be dealt with?*

	BG	Evolution 2017-2009	EU	Evolution EU 2017-2009	
EU level	50%	+2	44%	-1	Ensuring a fair standard of living for farmers
National Level	35%	-1	40%	+1	
Regional or Local	7%	-2	11%	=	
Don't know	8%	+1	5%	=	
EU level	40%	+8	42%	=	Ensuring reasonable food prices for consumers
National Level	46%	-7	42%	=	
Regional or Local	7%	-3	12%	=	
Don't know	7%	+2	4%	=	
EU level	40%	-32	48%	-5	Securing food supply
National Level	47%	+33	37%	+4	
Regional or Local	6%	+1	11%	+2	
Don't know	7%	-2	4%	-1	
EU level	52%	+3	51%	=	Ensuring that agricultural products are of good quality, healthy and safe
National Level	37%	-3	34%	=	
Regional or Local	5%	-1	11%	=	
Don't know	6%	+1	4%	=	

*Have you ever heard of the support that the EU gives farmers via the CAP?*

BG	Evolution 2017-2015	EU	Evolution 2017-2015	
8%	-4	10%	=	Yes, and you know the details
74%	+1	57%	-2	Yes, but you don't really know the details
16%	+2	32%	+2	No, you have never heard of it
2%	+1	1%	=	Don't know

**Do you think that the financial support given by the EU to farmers to help them stabilise their incomes is too low, about right or too high?**

<b>BG</b>	<i>Evolution 2017-2015</i>	<b>EU</b>	<i>Evolution EU 2017-2015</i>	
22%	-10	26%	-3	Too low
37%	+6	45%	+4	About right
5%	+2	11%	-2	Too high
36%	+2	18%	+1	Don't know

**To what extent do you think the EU through the Common Agricultural Policy (CAP) is fulfilling its role in...?**

	<b>BG</b>	<i>Evolution 2017-2015</i>	<b>EU</b>	<i>Evolution 2017-2015</i>	
<i>Total agree</i>	57%	=	56%	+4	Ensuring a fair standard of living for farmers
<i>Total disagree</i>	30%	+1	30%	-5	
<i>Dont'know</i>	13%	-1	14%	+1	
<i>Total agree</i>	59%	*	52%	*	Creating growth and jobs in rural areas*
<i>Total disagree</i>	29%	*	33%	*	
<i>Dont'know</i>	12%	*	15%	*	
<i>Total agree</i>	48%	=	60%	+4	Ensuring reasonable food prices for consumers
<i>Total disagree</i>	43%	-1	28%	-5	
<i>Dont'know</i>	9%	+1	12%	+1	
<i>Total agree</i>	64%	-10	72%	+2	Securing a stable supply of food in the EU**
<i>Total disagree</i>	15%	+4	15%	-1	
<i>Dont'know</i>	21%	+6	13%	-1	
<i>Total agree</i>	58%	*	62%	*	Ensuring a sustainable way to produce food*
<i>Total disagree</i>	21%	*	24%	*	
<i>Dont'know</i>	21%	*	14%	*	
<i>Total agree</i>	54%	+1	57%	+2	Protecting the environment and tackling climate
<i>Total disagree</i>	27%	-1	30%	-1	
<i>Dont'know</i>	19%	=	13%	-1	
<i>Total agree</i>	58%	-1	64%	-1	Providing safe, healthy food of high quality**
<i>Total disagree</i>	31%	+1	25%	+1	
<i>Dont'know</i>	11%	-2	11%	=	

Updated: March 2018

\* New items

\*\*Items slightly modified compared to 2015



REPUBLIC OF BULGARIA  
Minister of agriculture, food and forestry

TO

**PHIL HOGAN  
EUROPEAN COMMISSIONER  
FOR AGRICULTURE AND RURAL  
DEVELOPMENT**

**EUROPEAN COMMISSION**  
200, Rue de la Loi  
B – 1049 Brussels  
Belgium

**Regarding:** Need to support the tobacco producers' income post 2020

**DEAR MR COMMISSIONER,**

Bulgaria has long traditions in the tobacco growing, as it is a traditional sector of the Bulgarian agriculture. It has multifaceted significance for the development of certain regions in our country – social economical, demographical and ecological one.

The regions, where tobacco production is prevalent, are characterized with shallow, poor soils with low productivity, where in practice it is not possible from economic point of view to grow other crops. In this respect tobacco growing is of key economic importance for these regions, as it is the only crop that can provide the farmers with relatively higher income by using small sized areas. Therefore tobacco plays the role of important incentive for development of local economies, preserving the income of thousands families, living in the sensitive regions and maintaining a sufficient level of their economic development.

Tobacco production is stabilizing demographic factor which contributes to involving all members of the family and providing means in the family budget. For many regions in Bulgaria preserving the tobacco crops is an essential condition for preventing migration of the population.

Tobacco production also has significant ecological impact on environmental and soil preservation. Oriental tobacco offers the most efficient use of the poor soils, situated on sloped areas and prone to erosion in the regions with adverse climate and other conditions. In these regions the ecological balance depends strongly on the presence of this crop at the relevant territory.

Tobacco production in our country is characterized by very high extensibility and parcels fragmentation (90% of farmers cultivate tobacco on an area under 1 ha and the average size of the parcel area is between 0.3 and 0.5 ha). This, on the one hand, increases the production costs and, on the other hand, practically prevents tobacco growers from benefiting from the Single Area Payment Scheme (SAPS), as only 25% of the tobacco producers receive payments under this Scheme.

Tobacco growers are located in the less favored areas and areas, planted with Oriental tobacco, can hardly be used to grow alternative crops. That is why the process of establishing alternative activities in Bulgaria is very difficult.

These are the reasons why Bulgaria applies transitional national aid for tobacco in the period 2015-2020, which is a continuation of the National Payment Scheme. It is aimed at assisting the tobacco producers' incomes and does not stimulate the tobacco production. The additional support for tobacco growers provides an opportunity for a structural reorientation of the sector and redirects farmers from traditional tobacco production areas to alternative activities, while adapting to the new market conditions and requirements of the agricultural policy.

During the period of application of the two tobacco specific schemes - from 2013 to 2017, the Compound Annual Growth Rate (CAGR) of reduction of tobacco areas in the country is 14%. The harvested areas for the period 2013-2016 show an average annual rate of decrease of 21%. The downward trend in Oriental tobacco is the strongest (27%), which occupies most of the tobacco areas in the country. The average annual rate of decline in tobacco production in Bulgaria for the period 2013-2016 is 25%. In 2016, 15 211 tons of tobacco were produced in Bulgaria, while in 2013 the production amounted to 36 446 tons. A significant decrease is also observed in the value of the final tobacco production, with the average annual rate of decline of 14% for the period 2013-2017. The number of tobacco producers is also decreasing every year.

Transitional National Aid makes it possible for farmers, who have previously relied mainly on tobacco production income, to target other sectors of agriculture that do not always provide the same profitability in areas concerned. It has contributed significantly to the prevention of abandonment of farming and less favored areas depopulation.

Tobacco production in Bulgaria is in the process of significant restructuring which has not finished yet. Abolition of the complementary support of the tobacco producers income could lead to further deterioration of the social and demographic situation in the regions, which will aggravate the local economy, which goes against CAP efforts to ensure balanced regional development. It carries the risk that agricultural producers return to this production before the end of the sector restructuring process, going on in the country. It is therefore necessary to continue the policy of support until the final restructuring. The sector needs a longer period of time to find its balance, without causing serious damage to the vulnerable regions of the country which have no other economic alternatives.

The cessation of cultivation of this type of crop in the EU will not lead to the suspension of its use, but to an increase in its import.

**DEAR COMMISSIONER,**

By emphasizing my strong concern about the future of tobacco producers and the need to smoothly and painlessly finalize the restructuring of tobacco production and its gradual replacement with other agricultural and non-agricultural activities in sensitive regions, I hope that the Commission will take into account the above information. We should treat tobacco producers like all other farmers in the EU. I expect the possibility for continuation of the support for tobacco producers' incomes to be provided beyond 2020, by decoupled national transitional tobacco aid being eligible for inclusion in the National Strategic Plan.

Please accept, Mr. Hogan, the assurances of our highest consideration and respect.

**Best Regards**

  
**RUMEN PORODZANOV**



**PHIL HOGAN**  
MEMBER OF THE EUROPEAN COMMISSION  
AGRICULTURE AND RURAL DEVELOPMENT

Rue de la Loi, 200  
B-1049 Brussels  
Tel. +32-2 295 52 86  
[redacted]@ec.europa.eu

Brussels, 20. 04. 2018  
(2018)1504465

Dear Minister, [redacted]

*Thank you for your letter in which you express your concerns about the future of tobacco growers in your country. I understand the cultivation of tobacco has a special importance in certain regions of your country, and that its cultivation would be very difficult to replace by another crop or another activity.*

*You ask for a possibility to continue paying Transitional National Aid (TNA) under the current Single Area Payment Scheme (SAPS) after 2020.*

*The preparation of the future legislative framework is currently ongoing. In preparing its proposals, the Commission will carefully assess the needs in terms of direct payments for farmers, including by means of the SAPS to which the granting of TNA is related. At this stage of the preparations, I am however not yet in position to reply to your question whether the proposal will provide for the possibility to continue granting such national aids after 2020.*

*Yours sincerely,*

[redacted]  
Phil HOGAN

### Annex 3

Extract of Table 2,2 in VCS review form for Bulgaria													
OLD = ISAMM form 332(2015-2020)													
NEW/CORR = ISAMM form 632(2017-2020)													
OLD name (2015-2020)	NEW name (2017-2020)	OLD c.) The amount fixed for financing (in EUR) - 2017	NEW/CORR c.) The amount fixed for financing (in EUR) - 2017	OLD d.) The amount fixed for financing (in EUR) - 2018	NEW/CORR d.) The amount fixed for financing (in EUR) - 2018	OLD e.) The amount fixed for financing (in EUR) - 2019	NEW/CORR e.) The amount fixed for financing (in EUR) - 2019	OLD f.) The amount fixed for financing (in EUR) - 2020	NEW/CORR f.) The amount fixed for financing (in EUR) - 2020	OLD total 2017-2020	NEW/CORR total 2017-2020	Difference NEW/CORR - OLD over 2017-2020	% difference
1	Milk cows	23.919.001	15 386 818	23.919.001	15.386.818	23.919.001	15 386 818	23.919.001	15.386.818	95 676 004	61.547.272	- 34.128.732	-35,67%
2	Meat cows and heifers	12.714.163	9 586.723	12.714.163	9.586.723	12.714.163	9 586.723	12.714.163	9.586.723	50 856 652	38.346.892	- 12.509.760	-24,60%
3	Milk cows and meat cows under selection control	11.707.851	1 661 699	11.707.851	1.661.699	11.707.851	1 661 699	11.707.851	1.661.699	46 831.404	6.646.796	- 40.184.608	-85,81%
4	Ewes and She-goats	4.611.040	1 679 594	4 611.040	1.679.594	4.611.040	1 679 594	4.611.040	1.679.594	18.444.160	6.718.376	- 11.725.784	-63,57%
5	Ewes and She-goats under selection control	6.562.358	12 273 357	6 562.358	12.273.357	6.562.358	12 273 357	6.562.358	12.273.357	26 249.432	49.093.428	22.843.996	87,03%
6	Buffaloes	2.767.713	2 262 216	2.767.713	2.262.216	2.767.713	2 262 216	2.767.713	2.262.216	11 070 852	9.048.864	- 2.021.988	-18,26%
7	Fruit	20.024.464	16 359 829	20 024.464	16.359.829	20.024.464	16 359 829	20.024.464	16.359.829	80 097 856	65.439.316	- 14.658.540	-18,30%
8	Vegetables	18.162.790	14 397.148	18 362.080	14.397.148	18.561.370	14 397.148	18.561.370	14.397.148	73 647 610	57.588.592	- 16.059.018	-21,81%
9	Vegetables (under greenhouse production)	2.650.000	4 027.966	2 650.000	4.227.256	2.650.000	4.426 546	2.650.000	4.426.546	10 600 000	17.108.314	6.508.314	61,40%
10	Protein Crops	15.864.520	15 864 520	15 895.180	15.895.180	15.925.840	15.925 840	15.925.840	15.925.840	63 611 380	63.611.380	-	0,00%
11	Milk cows under selection control		18 819.427		18.819.427		18 819.427		18.819.427	-	75.277.708	75.277.708	#DIV/0!
12	Milk cows in Mountain Areas (5-9 animals)		613 550		613.550		613 550		613.550	-	2.454.200	2.454.200	#DIV/0!
13	Fruit (Plums and table grapes)		3 664 634		3.664.634		3 664 634		3.664.634	-	14.658.536	14.658.536	#DIV/0!
14	Vegetables (cabbage, watermelons and melons )		2 386.419		2.386.419		2 386.419		2.386.419	-	9.545.676	9.545.676	#DIV/0!
	<b>Total</b>		<b>118 983.900</b>		<b>119.213.850</b>		<b>119.443.800</b>		<b>119.443.800</b>				
National ceiling - Annex II			793 226.000	794.759.000	796 292.000	796.292.000							
ISAMM form 328, VCS %			15,00000000	15,00000000	15,00000000	15,00000000							
Corresponding amount			118 983.900	119.213.850	119.443.800	119.443.800							
Budgetary ceiling			118 984.000	119.214.000	119.444.000	119.444.000							

OLD = ISAMM form 332(2015-2020)

NEW = ISAMM form 632(2017-2020)

CORR= ISAMM form 632(2017-2020) corrected ve.

OLD name (2015-2020)	NEW name (2017-2020)/ Submeasures, if any	CORR c.) The amount fixed for financing (in EU) -2017	OLD 3.i. Fixed areas (ha)	NEW g.) Fixed areas(ha)	CORR g.) Fixed areas(ha)	OLD 3.i.) Fixed yields(t/ha)	NEW h.) Fixed yields(t/ha)	CORR h.) Fixed yields(t/ha)	OLD 3.j. Fixed number of animals	NEW j. Fixed number of animals	CORR j. Fixed number of animals	OLD 3.h.) The estimated per unit amount of support - 2017	NEW b.) The estimated per unit amount of support - 2017	CORR b.) The estimated per unit amount of support - 2017	OLD Differentiation of amount/head	NEW 2.3.b Modulated/unit amounts in 2017	CORR 2.3.b Modulated/unit amounts in 2017	Check (financial ceiling / QL)
1 Milk cows		15.386.818							134.923 head	134.923 head	134.923 head	123 l/unit				102/0 l/unit	79/0 l/unit	78,94
2 Meat cows and heifers	Meat cows and/or Heifers	9.586.723							111.759 head	111.759 head	111.759 head	114 l/unit				77/0 l/unit	86/0 l/unit	85,78
3 Milk cows and meat cows under selection control	Meat cows under selection control	1.661.639							59.231 head		10.181 head	198 l/unit				133/107 l/unit	164/131 l/unit	163,22
4 Ewes and She-goats	Ewes and She-goats in mountain areas (10-49 animals)	1.673.534							715.744 head		144.294 head	6 l/unit	23 l/unit	12 l/unit				11,64
5 Ewes and She-goats under selection control		12.273.357							213.311 head		232.433 head	31 l/unit				43/33 l/unit	42/34 l/unit	41,97
6 Buffaloes		2.262.216							12.894 head		8.087 head	215 l/unit				266/215 l/unit	285/228 l/unit	279,73
7 Fruit	Fruit (main group)	16.353.829	39.481 ha	24.206 ha	27.669 ha	4,20 t/ha	t/ha	15,60 t/ha				507 l/unit				822/548 l/unit	822/549 l/unit	591
8 Vegetables	Vegetables (main group)	14.397.148	38.024 ha	28.165 ha	28.165 ha	14,79 t/ha	t/ha	38,70 t/ha				478 l/unit				1114/743 l/unit	1114/744 l/unit	511
9 Vegetables (under greenhouse production)		4.027.966	1.060 ha	1.060 ha	1.060 ha	74,50 t/ha	74,50 t/ha	280,00 t/ha				2500 l/unit	5734 l/unit	5743 l/unit				3.800
10 Protein Crops		15.864.520	101.393 ha	101.393 ha	102.356 ha	2,39 t/ha	2,39 t/ha	5,20 t/ha				156 l/unit	156 l/unit	155 l/unit				155
11	Milk cows under selection control	18.819.427									83.185 head					214/159 l/unit	234/187 l/unit	226,24
12	Milk cows in Mountain Areas (5-9 animals)	613.550									7.895 head		92 l/unit	78 l/unit				77,71
13	Fruit (Plums and table grapes)	3.664.634		10.118 ha	10.978 ha		t/ha	15,40 t/ha								501/334 l/unit	501/334 l/unit	334
14	Vegetables (cabbage, watermelons and melons)	2.386.419		7.852 ha	7.852 ha		t/ha	42,30 t/ha								301/201 l/unit	301/201 l/unit	304