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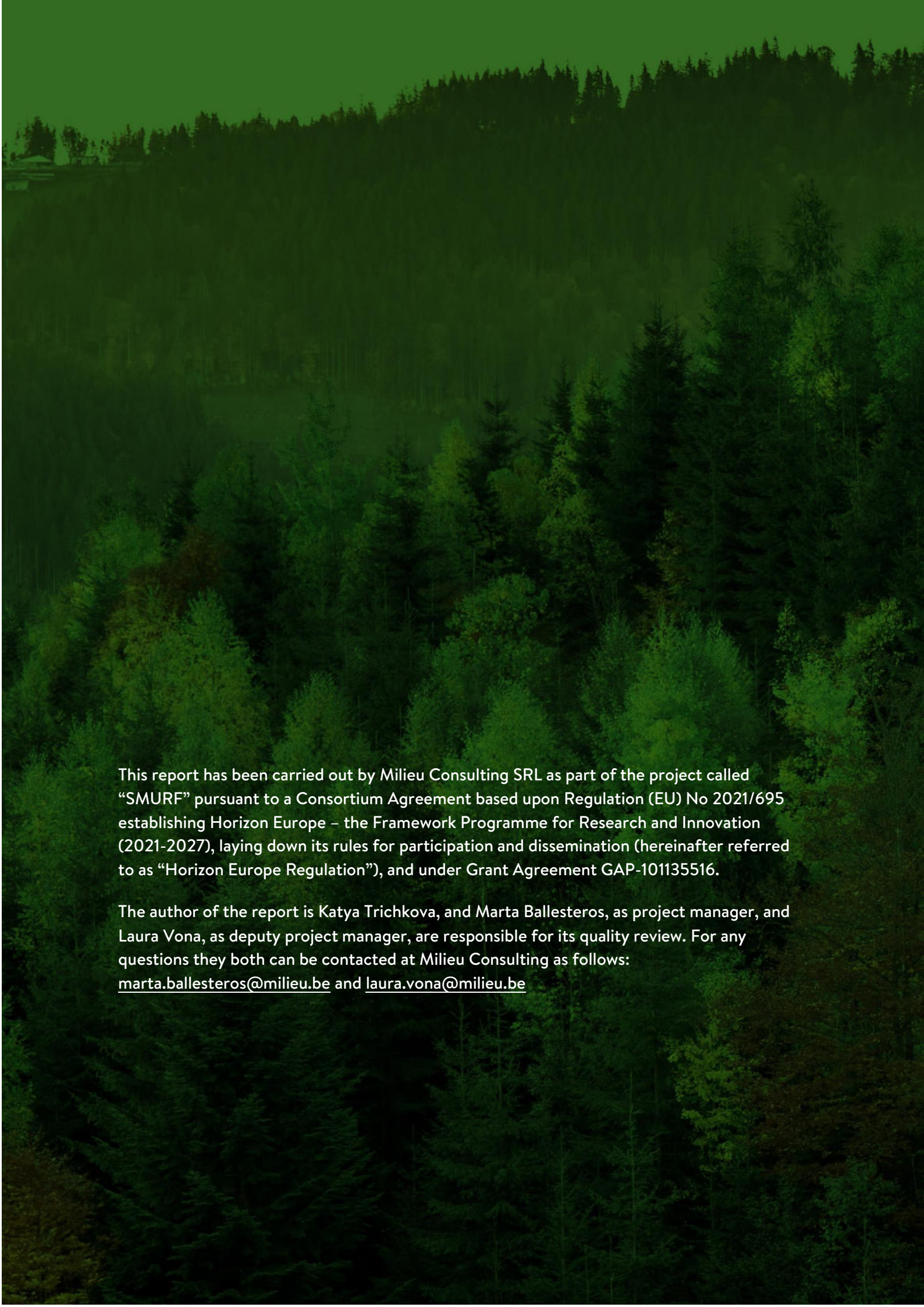
Legal and regulatory framework applicable to Small Forest Owners and Sustainable Forest Management

Country Fact Sheet
Bulgaria

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THE FOREST OWNERS' PROJECT

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Legal and regulatory framework applicable to Small Forest Owners and Sustainable Forest Management (SMURF) - WP2

Executive Summary

The main legal framework governing forestry sector in Bulgaria is the Forestry Act and a series of implementing regulations and strategic documents. The Act defines the ownership, management, protection, and sustainable use of forest resources. The national framework is quite comprehensive, emphasising sustainability, biodiversity protection, and public-private balance in ownership and usage rights. Complementary legislation includes the Protected Areas Act, Biodiversity Act, Environmental Protection Act, and laws on cadastre and land use.

Bulgaria's forests cover over 38% of the national territory, with state ownership prevailing (over 77%), followed by municipal (11%) and private ownership (approximately 11%). Forest ownership is highly fragmented, especially among private individuals, with over 1.5 million owners, and an average private forest parcel size below 0.59 ha. All transactions involving forest properties must be registered in the Property Register, which consists of entries for real estate properties and is the only valid proof of ownership. There is also a Cadastre that collects, maintains, and stores fundamental data on the location, boundaries, and dimensions of real estate properties. It also includes information about ownership rights over these properties, ensuring accurate and up-to-date records. The cadastral and the property register in Bulgaria are interlinked through a two-way system based on property identifiers

Land consolidation is legally supported but remains underutilised, and most private forest holdings remain small and scattered. Forest owners in Bulgaria have clearly defined rights and obligations. They may manage their forests independently if registered to exercise forestry practice, or assign this to state, municipal, or private contractors. Owners must ensure sustainable forest use, comply with forest management plans, and maintain forest health through fire prevention and pest control measures. They are entitled to use forest products on their lands and receive compensation or subsidies under EU-funded rural development measures but must adhere to restrictions, particularly within Natura 2000 areas or protected zones. Forest managers (although not legally defined) must follow approved forestry plans and national guidelines.

Sustainable Forest Management (SFM), although not defined, is a core principle in Bulgaria's forestry legislation. Forest planning is multi-level, involving national, regional, and local strategies and plans. Forests are functionally classified, and 71% serve protective and special functions. Certification under FSC and PEFC schemes is voluntary but increasingly practiced. The state supports forest inventory and planning, although implementation gaps remain, such as the underutilisation of the national forest inventory.

Incentives for forest owners include property tax exemptions, eligibility for rural development funds (e.g., afforestation, biodiversity conservation, and fire prevention), and targeted

subsidies under the Strategic Plan for Agriculture and Rural Development 2023–2027. The forest land market is relatively stagnant due to fragmentation, and limited interest in active forest management among small owners. Land consolidation programs, including a state-backed forest land purchase initiative, aim to address this challenge.

Key recommendations for improving the legal and institutional framework include: enhancing the implementation of forest inventory and information systems; ensure the timely adoption of strategic planning documents, including the National Strategy for Forest Sector Development until 2030, to enhance policy continuity, long-term sustainability, and effective coordination within the forestry sector. expanding support for land consolidation and cooperative management models; strengthening the incentives for small private owners to engage in active and sustainable forest management; improvement of the road infrastructure, which will ensure access and efficiency in forest management activities; elaboration and adoption of National Plan for Non-State Forestry Development and Regional forest development plans; enaction of legal provisions to promote public-private partnerships in the forestry sector.

These measures would bring the legal framework into closer alignment with the goals of sustainable forestry and the practical realities faced by small forest owners in Bulgaria.

Introduction

This is a Horizon project with a strong research approach. The name of the project is 'Sustainable Management models and value chains for small Forests' known as SMURF with the reference HORIZON-CL6-2023-CIRCBIO-01.

The general objective is to provide an analysis of the legal and regulatory framework in EU Member States applicable to small forest owners (SFO) in their practices aiming to Sustainable Forest Management.

The specific project objectives are:

1. Prepare a report on the legal framework on SFO for most EU Member State.
2. Identify the basic legislation regulating SFO and the specific articles setting rights and obligations and *provide the links* to those basic and articles.
3. Define the rights and obligations for SFO in EU Member States.
4. Define the legal framework for the economic activity of SFO in EU Member States.
5. Identify the main legal limitations or barriers for SFO in EU Member States.
6. Identify needs for legal reforms and propose specific legal improvements, when considered necessary.
7. Prepare a comparative analysis of the legal framework SFO in the EU Member States.

These guidelines provide the basic information for the elaboration of the report on legal framework applicable to Small Forest owners/holders. It is complemented by a pilot report showing as a model to show the level of depth of the analysis.

When using the term "legal framework" we consider:

- The organisational model of forestry and the forest value chain.
- The institutional framework, identifying the distribution of competences among the different administration levels (European, national, regional and local) and administration sectors (agriculture and rural development, environment, industry, interior, economics and others).
- The regulatory framework, identifying laws and regulations that affect forestry and the forest value chain. The key articles that set basic rules for forestry will be explicitly referred and translated into English.

The analysis will be focused on factors that affect the participation of forest holdings in the market. There is a particular interest in identifying barriers, obstacles and measures or instruments that have had a significant positive impact in the present functioning of the forest markets.

The analysis will describe the nowadays situation of the framework, although a contextual and short reference of the origin and evolution of the framework when needed for a good understanding will be included.

The analysis will consider the national legislation and will only refer to the regional legislation as a way of example to confirm the national legal framework or to show that in some regions the situation may be rather different.

The analysis will take into consideration the forest sector legislation, but not only, because the main barriers and legal limitations might be derived from the inadequacy of other sectoral laws (societal, fiscal, real state and ownership, cadastral, insurances) or requirements in some pieces of national environmental legislation. It will refer to Nature or Biodiversity Conservation law and to the Environmental Impact Assessment legislation while it might also refer to relevant agriculture legislation.

1. Basic legal and regulatory framework applicable to small forest owners

1.1. Context to the legislation

The forests of Bulgaria are perceived by Bulgarian society as part of the nation's wealth and identity[1], deeply rooted in over a century of forest management traditions. The country's forestry policies and legislation have evolved alongside its political and economic changes, shaping the way forests are administered, utilised, and protected.

The foundation for modern forest management was laid in 1883 with the passage of the first forestry act, which aimed to curb the widespread deforestation and mismanagement that plagued Bulgaria before and shortly after its Liberation in 1878. This law categorised forests by ownership – state, municipal, and private – establishing a framework for more organised forestry practices.

During the early 20th century, forestry policies focused on defining forest management as a structured discipline while initiating efforts in erosion control, conservation, and planned forest use. Despite these advances, the period was still characterised by excessive logging, particularly near settlements, with forest regeneration occurring primarily through natural processes.

After World War II, under communist rule (1945-1989), all forests became state public property[2] and were managed under a centrally planned economy. This era saw large-scale investments in afforestation, forest productivity, and conservation, with a strong emphasis on industrial forestry and foreign trade. Mass afforestation significantly expanded Bulgaria's forested areas, reflecting the state's commitment to both economic and environmental sustainability.

Following the political and economic transition after 1989, Bulgaria's forestry sector underwent significant reforms to adapt to a market economy and diverse ownership structures. More precisely, after the democratic reforms in the late 1980s and early 1990s, Bulgaria began a process of restoring fundamental democratic values and principles. Legal acts were introduced to restore expropriated private property, including forests, to original owners or heirs. These measures aimed to reverse state appropriation and reinforce the restitutionary process[3]. The 1997 law on forest land restitution (Restoration of Ownership of Forests and Forestry Fund Lands Act) marked a pivotal moment, restoring private ownership rights while ensuring forests remained a national priority. The Forestry Act of the same year (State Gazette No 125 of 1997) reinforced the principle that forests are a national asset, balancing the interests of private owners and society. It also introduced structural reforms, separating state management from economic activities. The act was then repealed by a new Forestry Act in 2011 (see Section 1.2).

[1] Source: National Forestry Accounting Plan of Bulgaria, including Forest Reference Levels for the period 2021-2025, prepared under a contract between Ministry of Environment and Water and Forest Research Institute – Bulgarian Academy of Sciences, 2020 - Chapter II Description of the forestry policy and practice

[2] For more information see Licheva, M., Глава I, §2. Национализация и реституция на гори

[3] For more information see Licheva, M., Глава I, §2. Национализация и реституция на гори

A major step in environmental protection came in 1998 with the Protected Areas Act, which designated 7.5% of forested lands as protected areas, including nature reserves and national parks. This law emphasized biodiversity conservation and restricted activities such as clear cutting and the introduction of non-native species. Management of these protected areas was entrusted to the Ministry of Environment and Water.

Despite these regulatory advances, the post-1989 years were also marked by a decline in forestry investment and reduced afforestation efforts. While the legal framework for sustainable and multifunctional forest management was strengthened, the sector faced challenges in maintaining forest resources at optimal levels. More recently, conditions for sustainable forest management have improved, with an increase in forest area, timber stock, and carbon reserves. Enhanced cooperation, financial support, and regulatory measures have also contributed to better forest protection and management, though further efforts are needed to strengthen resilience against climate change and ensure the long-term vitality of forest ecosystem[4].

This historical background has significantly shaped the current state of the forestry sector in Bulgaria, particularly in terms of forest ownership distribution. The transitions from state-controlled management to market-oriented policies, coupled with land restitution efforts, have led to a diversified ownership structure. Today, Bulgaria's forests are divided among state, municipal, and private owners, reflecting the legacy of past policies and reforms. The emphasis on sustainable forest management, biodiversity conservation, and responsible resource use continues to be a key priority, balancing economic interests with environmental protection.

1.2. Basic legal instruments

The Bulgarian legal system is based on the continental system of codification. There is a strictly defined hierarchy of the sources of law, as follows:

- According to its Article 5(1), the Bulgarian Constitution (*Конституция на Република България*), adopted on 12 July 1991, is the supreme law and other laws cannot contradict it. The Constitution provides for the basic rights of citizens as well as the structure, functions and collaboration between the sectors of government.

- International treaties and agreements to which Bulgaria is a party: according to Article 5(4) of the Constitution these international agreements have direct application and priority over conflicting national legislation, after their official ratification, promulgation and entry into force. This rule has been applied consistently by Bulgarian courts.

- Codes and Acts: Codes regulate public issues of a whole sector of the legal system or of an independent part of it. Some major sectors of the legal system are codified, even though codes (enacted by the Parliament) have equivalent standing to Acts of Parliament. The only competent authority to adopt Acts and Codes, proposed by its own members or the Government, is the Parliament – the holder of legislative power in Bulgaria. This category

[4] Analysis of the State of the Forest Sector in the Republic of Bulgaria for the Period 2013–2021, p. 168 and 16.

also includes the acting Decrees with the rank of Laws, issued before 1989 by the previous state bodies, called Presidium of the National Assembly and State Council.

- Legislative acts of the Council of Ministers *(Министерски съвет)* which have the following ranking:
    - Legislative decrees
    - Rules for implementation of Laws and Decrees
    - Ordinances for implementation of separate provisions or parts of higher legislative acts.

- Legislative acts of Ministers, which have the following hierarchy:
    - Rules for Implementation
    - Ordinances

- Ordinances of the Municipal Councils *(Общински съвети)* regulating public relations of local importance which are not regulated by higher legislative acts.

Court judgments are not recognised as formal sources of law, but they serve interpretation purposes. The Supreme Administrative Court and the Supreme Court of Cassation are the highest courts of appeal and determine the application and the interpretation of all laws. The Constitutional Court, which is separate from the rest of the judiciary, interprets the constitution and rules on the constitutionality of laws and treaties.

Regarding the relevant legal and regulatory framework for forestry, several provisions of the Bulgarian Constitution address this topic: Article 15(1) stipulates that the state ensures the protection and restoration of the environment, the maintenance and diversity of wildlife, and the rational use of the country's natural wealth and resources. Article 18(1) further specifies that forests designated by law are exclusive state property. Article 55 establishes that everyone has the right to a healthy and favourable environment in accordance with established standards and regulations and is obligated to protect the environment.

The main national legislation for forests and the forest sector in Bulgaria is the Forestry Act (*Закон за горите*)[5], which governs forest management, protection, and sustainable use[6];

[5] This act, promulgated in the Official Gazette No. 19 of March 8, 2011, repealed the 1997 Forestry Act.

[6] Chapter XVII (Articles 248–251) defines the public ecosystem benefits provided by forest territories and establish how they are managed and compensated. Such benefits include soil and water protection, biodiversity conservation, noise and pollution reduction, recreation and tourism opportunities, preservation of traditional landscapes and heritage, protection of infrastructure, and climate regulation.
When these public ecosystem services support economic activities (e.g., water supply, tourism, or infrastructure protection), they are considered payable. Regional forest development plans has to identify which forest areas and types of economic activities require such payments. Businesses benefiting from these services must pay compensation to the municipality where the activity occurs. Municipalities then distribute the collected funds annually among forest owners, state forest, and hunting enterprises whose lands contribute to these benefits. The funds may only be used for compensations or environmental and forest-related projects. A government regulation defines the methodology for calculating and distributing payments. Forest areas leased or rented for management are exempt from these compensations, and municipalities must report annually on collected and used funds to the regional forestry directorate. A consulted forest association noted that this chapter has not been developed or

defines ownership rights and obligations for forest owners; regulates logging, reforestation, and land-use changes. Its provisions are further elaborated by the Rules for implementation of Forestry Act (*Правилник за прилагане на Закона за горите)* and several implementing Ordinances:

- Ordinance No 1 of 30 January 2012 on the control and conservation of forest territories (*Наредба №1 от 30.01.2012 г. за контрола и опазването на горските територии*)
- Ordinance No 2 of 7 February 2013 on the conditions and procedure for afforestation of forest areas and agricultural land used to create special, protective and commercial forests and forests in protected areas, inventory of created crops, their reporting and registration (*Наредба № 2 от 7.02.2013 г. за условията и реда за залесяване на горски територии и земеделски земи, използвани за създаване на специални, защитни и стопански гори и на гори в защитени територии, инвентаризация на създадените култури, тяхното отчитане и регистриране*)
- Ordinance No 2 of 30 January 2012 on the conditions, methods and procedures for the application of plant protection products in forest areas (*Наредба №2 от 30.01.2012 г. за условията, начините и реда за прилагане на продукти за растителна защита в горските територии*)
- Ordinance No 4 of 19 February 2013 on protection of forest areas against erosion and torrential rains and construction of fortifications (*Наредба №4 от 19.02.2013 г. за защита на горските територии срещу ерозия и порои и строеж на укрепителни съоръжения*)
- Ordinance No 8 of 11.05.2012 on the conditions and procedures for the protection of forest areas from fires (*Наредба № 8 от 11.05.2012 г. за условията и реда за защита на горските територии от пожари*)
- Ordinance No 8 of 5 August 2011 on forest logging (*Наредба № 8 от 5.08.2011 г. за сечите в горите*)
- Ordinance No 9 of 5 December 2019 on the protection of forest areas from diseases, pests and other damages (*Наредба № 9 от 5.12.2019 г. за защита на горските територии от болести, вредители и други повреди*)
- Ordinance No 18 of 7 October 2015 on inventory and planning in forest areas (*Наредба № 18 от 7.10.2015 г. за инвентаризация и планиране в горските територии*)
- Ordinance No 20 of 18 November 2016 on the content, conditions and procedure for the creation and maintenance of forestry maps (*Наредба № 20 от 18.11.2016 г. за съдържанието, условията и реда за създаването и поддържането на горскостопанските карти*)
- Ordinance on the conditions and procedures for the assignment of activities in forest areas - state and municipal property, and for the use of wood and non-timber forest

implemented. To consider that consultations with a forest association from Bulgaria took place in September 2025. Its input has been addressed and included within this report.

products (*Наредба за условията и реда за възлагане изпълнението на дейности в горските територии - държавна и общинска собственост, и за ползването на дървесина и недървесни горски продукти*)

- Ordinance on the appraisal of land properties in forest areas (*Наредба за оценка на поземлени имоти в горски територии)*
- Ordinance on determining the amount of compensation for damage to forests and forest land (*Наредба за определяне размера на обезщетенията за щети върху гори и земи от горския фонд)*

Other relevant laws are:

- Biodiversity Act (*Закон за биологичното разнообразие*), which regulates activities in forests included in protected areas or the Natura 2000 network and imposes restrictions to maintain biodiversity and ecological balance, including the requirement for compatibility assessment of projects and plans.
- Environmental Protection Act (*Закон за опазване на околната среда*), which provides general provisions for environmental impact assessments for forestry projects, ensures compliance with national environmental standards.

- Law on Ownership and Use of Agricultural Lands (*Закон за собствеността и ползването на земеделските земи*), which is applicable to forest land converted from agricultural land or vice versa and relates ownership, usage rights, and lease agreements.
- Restoration of Ownership of Forests and Forestry Fund Lands Act (*Закон за възстановяване на собствеността върху горите и земите от горския фонд*), which regulates the process of returning forests and forest lands that were nationalised or expropriated, ensuring the restitution of property rights to their former owners or their heirs.

- Protected Areas Act (*Законът за защитените територии)* - establishes guidelines for the designation, protection, and management of protected forests, ensuring biodiversity conservation and ecosystem balance.

- Spatial Development Act (*Закон за устройство на територията*) controls land use, zoning, and building permissions in forested areas.
- Law on Hunting and Game Protection (*Закон за лова и опазване на дивеча*)- governs wildlife management within forests, setting regulations for hunting, game conservation, and habitat protection in alignment with forestry policies.

1.3. Basic Regulatory framework

The policy for sustainable management of the forestry sector in the Republic of Bulgaria is shaped through a system of regulatory and strategic documents, which, in their interconnectedness, define the strategic perspective for its development. As per Aricle 9 of the Forestry Act, forest planning is conducted at three levels and encompasses: a National Strategy

for the Development of the Forestry Sector and a Strategic Plan for the Development of the Forestry Sector; Regional Plans for the Development of Forest Territories; Forest Management Plans and Programs. More in detail:

- **National Strategy for the Development of the Forest Sector in the Republic of Bulgaria until 2030** (*Национална стратегия за развитие на горския сектор в Република България за периода до 2030 г.*). This strategy outlines the objectives of state policy for forestry development and includes an analysis of the current state of the forestry sector; objectives and priorities and means to achieve these objectives. At the time of drafting this report, an updated Strategic Plan for implementing the National Strategy for Forest Sector Development until 2030 and the Strategy itself have not yet been adopted. This gap in strategic planning presents challenges in aligning forestry policies with long-term sustainability goals, resource management, and sectoral reforms.
- **Strategic Plan for the Development of the Forestry Sector 2014–2023** (*Стратегически план за развитие на горския сектор 2014-2023 година*). This plan outlines specific actions to achieve the objectives set in the National Strategy for the Development of the Forestry Sector, covering a 10-year period. To consider though that the plan is expired and there is not a new one.
- **Regional Plans for the Development of Forest Territories** *(Областни планове за развитие на горските територии)*. These 10-year plans must be aligned with the National Strategy and the Strategic Plan for the forestry sector. They include:
    - Mapping.
    - Functional zoning.
    - Zones for protection against urbanisation[7].
    - Management goals for forests and hunting.

  These plans apply to all forest territories, irrespective of ownership, and are commissioned by regional forest directorates, with funding from the state budget. Currently, only **3 regional plans (out of 28)[8]** have been developed.
- **Forest Management Plans** *(горскостопански планове):* These plans are developed for state and municipal forest territories, excluding areas designated for national security and

[7] This notion is legally defined in para.1, point 25 of the Additional provisions of the Forestry Act. A "Zone for Protection Against Urbanisation" is a part of forest territories where construction is prohibited, except for elements of technical infrastructure, hydrotechnical facilities, and structures related to the management of forest territories.

[8] According to the information provided in the Evaluation of the results of the implementation of the Strategic Plan for the Development of the Forestry Sector in the Republic of Bulgaria 2014-2023, for the period 2021-2023 and for the whole period by operational objectives and activities (page 97-98) *"Of the three Regional Plans for the Development of Forest Territories (RPDFTs) developed in the previous reporting period, two have been adopted in 2024—one for Montana region and the other for Dobrich region. The third RPDFT developed for Smolyan region, is currently at the stage where the Ministry of Environment and Water (MoEW) needs to schedule a Working Expert Unit meeting for the adoption of the environmental assessment.*
Between 2021 and 2023, two Regional Plans for the Development of Forest Territories were developed for the regions of Yambol and Sliven and submitted to the MoEW for a decision on the applicable environmental assessment procedure. Additionally, assignments have been prepared for the development of two Regional Plans for the Development of Forest Territories for the Shumen and Targovishte regions". The same document specifies that pilot projects have been delayed for years due to planning deficiencies and remain unfinished. Funding for a single RFDP is unrealistically low, failing to reflect its key legal functions or ensure contractor accountability. This underfunding deters experienced professionals from participation. Additionally, the 2014 manual for RFDP development has not been applied.

defence purposes. Plans or programs are also prepared for forests owned by individuals, legal entities, and their associations[9]. They:

- Determine the allowable use of forest resources.
- Set guidelines for achieving forest management goals over a 10-year period.
- Are based on forest management maps, cadastral maps, land restoration maps, and forest inventory data. Specialized forest management maps are defined under the Cadastre and Property Register Act (*Закон за кадастъра и имотния регистър*). For state-owned forest territories, plans for the territorial divisions of state enterprises (as per Article 163) are prepared according to the boundaries of forest territorial units.

Municipal Development Plans: As per Article 15 of the Forestry Act , municipal development plans must include a section on forest development, aligned with the regional forest development plan. This section is based on approved forest management plans and programs and sets guidelines for forestry and related activities within the municipality.

[9] See section 5 for more information.

2. Governance and institutional framework

2.1. Distribution of competences between the State and Regional authorities.

- According to the legal framework, what are the relevant competences and responsibilities regarding decisions on forest management and forest management practices at the different State level (national, regional, municipal) in your country? Please describe the situation stating the legislation and relevant provisions.

Legal background

Bulgaria is a unitary republican State and comprises of three levels of governance: central, regional and municipal. The executive power in Bulgaria is distributed between the state and regional administrations.

- State administration

The Council of Ministers (*Министерски съвет*) is the main holder of the executive power. The Council of Ministers has general competences with respect to formulation, elaboration and implementation of state policy in compliance with the rights and powers granted to it by the Constitution and by the laws of the Republic of Bulgaria. It ensures public order and national security and exercises overall conduct of the state administration. The Council of Ministers directs and co-ordinates the work of the ministers and the other executive bodies in its structure. Each Minister is a central one-man body of executive power with a special competence to manage a particular ministry. In the field of the forest legislation, the competent Ministry is the Ministry of Agriculture and Food (*Министър на земеделието и храните*).

The structure of the central state administration comprises also agencies, executive agencies and state commissions and departments. Their chiefs are appointed by the Council of Ministers if another is not ruled by law.

- Regional administration

Bulgaria is divided into 28 regions, each led by a government-appointed regional governor. Acting as a representative of the central government, the governor holds executive power at the regional level, balancing national and regional interests in policy implementation. They coordinate the activities of executive bodies, oversee their interaction with local authorities, and ensure the legal compliance of local government decisions.

Municipalities are the main administrative units of self-government in Bulgaria, with a total of 265 across the country. They have regulatory authority as defined by law and are governed by elected municipal councils and mayors. The mayor serves as both an elected representative and the chief executive of the municipal administration. Each municipality has an administrative staff responsible for carrying out daily operations and implementing local policies.

It should be mentioned that in recent years there has been a gradual transfer of services from central to local governments. Areas/activities that were previously state monopolies – like

school education, health care, water and electricity supplying, waste management – are now being partially or totally transferred to the competency of the local governments.

National competences

The Ministry of Agriculture and Food oversees national forest policies and sustainable forest management and develops and approves forest legislation and strategic plans.

The state policy in the field of forestry is implemented by the Ministry of Agriculture and Food through the Executive Forest Agency. The Executive Forest Agency's field of competences, as laid down in Article 156 of the Forestry Act, includes the following:

- Supporting the development and coordinating the implementation of the National Strategy for the Development of the Forestry Sector.
- Developing the Strategic Plan for the Development of the Forestry Sector.
- Organising the development and overseeing the implementation of the Regional Plans for the Development of Forest Territories, Forest Management Plans, and Programs, as well as the Natural Parks Management Plans.
- Establishing and maintaining an information system for forest territories and related activities.
- Implementing the investment program of the Ministry of Agriculture and Food for forestry activities, as well as managing international and national programs and projects in the field of forestry.
- Participating in the work of subsidiary bodies of the European Commission to support its activities in forestry and establishing relations with other international organisations.
- Controlling the implementation of the Forestry Act and exercising general supervision and methodological guidance over the activities of all bodies and individuals entrusted with obligations under the Act.
- Providing information, consulting, and delivering administrative services to citizens, forest owners, legal entities, and state authorities on issues related to forestry.
- Assisting forest owners in cases provided for by law.
- Coordinating and controlling the protection and conservation of forests, forest seed control, research, and engineering implementation activities.
- Interacting with non-governmental organisations to ensure their participation in the formation and implementation of state policy in the field of forestry.

Decisions affecting forests within Natura 2000 or other protected areas require coordination with the Ministry of Environment and Water (*Министерство на околната среда и водите*) and compliance with biodiversity regulations. The management of conservation areas is a shared responsibility between the Ministry of Agriculture and Food, the Executive Forest Agency and the Ministry of Environment and Water as outlined in the Protected Areas Act. The Ministry of Environment and Water supervises the management of all protected areas, directly

overseeing national parks and reserves, while the Executive Forest Agency is responsible for nature parks, protected sites, and natural monuments located within state-owned forests.

Regional competences

Regional Forest Directorates (RFD) *(Регионални дирекции на горите)* are regional divisions of the Executive Forest Agency and carry out its functions within their designated area of activity. The area of activity of each of the RFD covers the entire territory of one or more districts within the meaning of the Law on the Administrative and Territorial Structure of the Republic of Bulgaria. There are 16 RFD.

Their competences are outlined in the Regulations on the Structure and Functioning of the Regional Forestry Directorates (Устройствен правилник на Регионалните дирекции по горите) such as:

- Assignation of the development of regional forest territory development plans.
- Assignation of the development of forest management plans for state forest enterprises and state hunting enterprises, as well as plans for hunting activities and fire protection measures, when these coincide with forest inventory activities.
- Approbation of forest management plans and programs for non-state-owned forest territories within its jurisdiction.
- Preparation and submission of an annual activity report to the Executive Director of the Executive Forest Agency.
- Supervision and enforcement of compliance with forestry laws and regulations, exercising general oversight and methodological guidance over all responsible entities. Additionally, monitoring of the implementation of forestry activities on state-owned, privately-owned, and municipally-owned forest territories within its jurisdiction.
- Assistance to the Executive Forest Agency in developing the National Strategy for Forest Sector Development and the Strategic Plan for Forest Sector Development.
- Propositions to regional governors on the designation of fire hazard seasons in forest territories for the respective regions.
- Restriction of access to specific forest areas when necessary.
- Designation of forest roads where vehicular movement is unrestricted when required.
- Granting permission for organised public or sports events in forest areas when necessary.
- Suspension of activities in forest areas as specified in Article 253, paragraph 3 of the Forestry Act.
- Imposition of sanctions for violators in the cases provided by the law.
- Performance of other functions related to its activities as defined by law, acts of the Council of Ministers, the Ministry of Agriculture and Food, or the Executive Director of the Executive Forest Agency.

The Executive Director of the Executive Forestry Agency, in coordination with the Ministry of Agriculture and Food, establishes specialised territorial units for the protection and

conservation of forests; for forest seed control; for inventory and arrangement of the forest fund; for research and engineering implementation activities; for other specialised activities. The Executive Director also designates the seats of these units.

On top of the specialised territorial units listed above, the Executive Director also designates directorates of nature parks for the implementation of orders for designation and management plans of natural parks (also called Nature Parks Directorates). There are 11 Nature Parks Directorates *(Дирекции на природни паркове)*.

The Nature Parks Directorates assist the Executive Director of the Executive Forest Agency in the implementation of the state policy in the field of conservation, sustainable use and restoration of forests, biological and landscape diversity, as well as in the implementation of the policy of the European Community and international commitments in this direction in its territorial scope of activity. Their main competences include:

- plan, organise, coordinate, supervise and participate in the implementation of activities and projects related to: scientific research; maintenance and restoration of biodiversity; conservation and restoration of natural habitats and of populations of plant and animal species or of the conditions of their habitats; conservation and management of landscape components; forest regeneration and protection against erosion; construction and maintenance of architectural elements for the servicing of recreation and tourism; facilities providing protection of cultural values and monitoring stations; production and publication of information, advertising, educational and other popular materials;
- monitor the status of biodiversity of natural ecosystems, communities and individual taxa; the status of populations of protected, rare, endangered and endemic representatives of wild flora and fauna as part of the National Biodiversity Monitoring System; the tourist load within the park;
- develop, organise and coordinate educational programs for the local population and park visitors;
- plan, organise and conduct training courses for the workers, employees, landowners in the forest areas, employees of the municipal administrations and issue training materials;
- draw up the terms of reference for the park management plans;
- participate in the process of development and implementation of the management plans for the natural park and protected areas within the territorial scope of the Directorate's activity and related spatial and technical plans and projects;
- participate in the procedure of development and discussion of spatial and technical plans and projects, regional plans for development of forest areas, forestry plans and programs affecting protected areas and zones in the territorial scope of the Directorate's activity;
- participate in committees for the approval of construction projects within the territorial scope of the Directorate's activity;

- participate in the monitoring and signalling of the protection of forest areas from diseases, pests and other damage, as well as the protection and defence against forest fires;
- participates in the adoption of the regional plans for the development of forest areas, inventories and forestry plans for the forests and lands that fall within the territorial scope of the Directorate's activities;
- exercise control over compliance with the national legislation
- assist in the organisation of the fight against forest fires and supervise the implementation of measures and measures for the protection of forest areas from fires;
- participate in the control of the protection of forest areas, as well as game and fish resources in water bodies used for recreational fishing in the forest areas within the boundaries of the nature park;
- impose sanctions for violators in the cases provided by the law.

Local/municipal competences

Municipal Administrations have jurisdiction over municipal-owned forests; work in collaboration with RFDs to implement national and regional policies; manage municipal forests based on approved forest management plans; implement local-level conservation and reforestation initiatives; ensure compliance with logging and afforestation requirements within municipal forests; integrate forest management considerations into municipal spatial and development plans.

Forest coordination and advisory bodies

A National Forest Council (*Национален съвет по горите)* is established in 2023 as an advisory body to the Ministry of Agriculture and Food to: discuss basic issues of forestry, assists the Ministry in the implementation of the state policy forestry, the preparation of draft forestry legislation and the resolution of problems of high public interest in the field of forestry. It comprises representatives from key ministries, state agencies, academia, municipalities, forest owners, and relevant non-profits[10].

2.2. Key representation organisations of the forest sector

1. Forest owners:

The National Association of Non-State Forest Owners "Gorovladelets" was established in 2002 by seven forestry cooperatives in Chepelare. The association currently includes 22 forestry cooperatives, 1 municipality, 2 forestry enterprises, 2 joint-stock companies, and 15 individuals. It represents approximately 85,000 forest owners, advocating for their interests and

[10] More specifically by: representatives of the Ministry of Agriculture and Food, the Ministry of Environment and Water, the Ministry of Interior, the Ministry of Regional Development and Public Works, the Ministry of Finance, the Ministry of Justice, the Executive Forestry Agency, the state-owned enterprises for the management of forest territories - state property, the Bulgarian Academy of Sciences, the University of Forestry, municipalities and other forest owners and non-profit legal entities whose activities are related to the management and protection of forests.

sustainable forest management. The association participates in working groups and discussions and sends opinions and proposals regarding the regulatory framework.

2. Forest municipalities:

The "Municipal Forests" Association represents municipalities that own forests in Bulgaria. It has 60 member municipalities and is a member of the European Federation of Municipal Forest Owners, working to support sustainable forest management and municipal forest ownership policies.

3. Forest industry:

The Forestry Act (Articles 214–224) establishes a framework for industry organisations in the forestry and wood processing sectors. Companies and individuals engaged in forestry activities can form industry organisations based on two main branches:

- "Forestry Management" – covering forest inventory, timber extraction, and management planning (Article 214(1)).
- "Wood Processing and Furniture Industry" – covering primary and secondary wood processing (Article 214(1)).

According to data from the Executive Forest Agency, which is responsible for their registration, there are over 2,000 logging companies in Bulgaria. As of 2016, only 460 of them were considered active, with their number fluctuating significantly over time. The number of wood processing enterprises in Bulgaria is significant and includes companies for the production of building elements, furniture enterprises, pulp and paper production, manufacturers of energy carriers from wood biomass, and other enterprises.

The Branch Chamber of the Woodworking and Furniture Industry (BCWFI) is a voluntary non-governmental organisation dedicated to protecting and advocating for the interests of its members and the industry. BCWFI is the sole official representative of employees in the furniture manufacturing and woodworking sector, as well as those involved in the production and supply of equipment and materials for the wood processing and furniture industry.

There is also the Federation of Trade Union Organizations in Forestry and Woodworking Industry.

4. Forest clusters:

n/a

5. Forest contractors:

n/a

6. Forest Professionals:

The "BULPROFOR – Union of Practicing Foresters and Other Forestry Entrepreneurs in Bulgaria" is a member of the Union of Foresters in Europe and the European Network of Forestry Entrepreneurs. It holds an ISO 9001:2000 quality management certificate, issued by Moody International. The organisation has 12 legal entities and 72 individual members.

The enterprises involved in the development of forest management plans and forest inventories are registered traders under Article 241 of the Forestry Act. There are eight such companies[11].

7. Forest Agents or rangers:

Union of Bulgarian Foresters (*Съюз на лесовъдите в България*) is a non-profit legal person, which aims to support the sustainable management, regeneration, and utilisation of forests, game, and fish in Bulgaria's forest territories, in accordance with legislation and public interest. It works to uphold the professionalism, ethics, and authority of the forestry profession while protecting its members from unjustified pressure. Additionally, the Union actively contributes to improving forest policies, regulations, and strategic management to enhance forestry governance in Bulgaria.

8. Forest Sciences:

The University of Forestry (*Лесотехнически университет*) is a state university located in Sofia, Bulgaria. It comprises six faculties and 30 departments, offering education in fields such as forestry, wood technology, furniture production, engineering design, landscape architecture, ecology, environmental protection, veterinary medicine, agronomy, plant protection, business management, and alternative tourism. The university is recognised as a leading educational and scientific center in the management and sustainable use of natural resources.

Another relevant organisation is the Forest Research Institute at the Bulgarian Academy of Sciences (*Институт за гората при Българска академия на науките*), which comprises four departments:

- **Forest Ecology**: focuses on the study of forest ecosystems, their functions, and environmental interactions.
- **Forest Entomology, Phytopathology, and Game Fauna**: specialises in forest pests, diseases, and wildlife management.
- **Forest Genetics, Physiology, and Plantations**: deals with the genetic diversity, physiological processes, and cultivation of forest species.
- **Silviculture and Management of Forest Resources**: covers topics such as silviculture, biology, ecology, regeneration, cultivation, and utilization of forest ecosystems, as well as forest assessment.

The Institute of Biodiversity and Ecosystem Research (IBER) (*Институтът по биологично разнообразие и екосистемни изследвания*) consists of the following departments:

- **Plant and Fungal Diversity and Resources**: studies the diversity and resources of plants and fungi.
- **Animal Diversity and Resources**: focuses on the diversity and resources of animal species.
- **Aquatic Ecosystems**: researches freshwater and marine ecosystems.

[11] Agrolesproject Ltd. (state-owned), Proles Engineering Ltd., Silva 2003 Ltd., Kaveko Engineering Ltd., Aiko-1991, Nishava KiT, Prizma Info Ltd., Geosystem Ltd.

- **Ecosystem Research, Environmental Risk, and Conservation Biology**: conducts studies on ecosystems, assesses environmental risks, and develops conservation strategies.

IBER conducts national and international scientific research on theoretical and applied aspects of ecology, biodiversity, environmental protection, and the sustainable use of biological resources. The institute is a member of the Consortium of European Taxonomic Facilities (CETAF).

9. Forest certification:

The standard certifications that currently exist in Bulgaria are: FSC (Forest Stewardship Council) and PEFC (Programme for the Endorsement of Forest Certification). Council for Sustainable Forest Management and certification in Bulgaria[12] is a non-profit and non-governmental organisation established as a National Governing Body for promotion of sustainable forest management according to the requirements of PEFC.

10. Public enterprises

State-owned forested areas in Bulgaria are managed by 6 State Forest Enterprises[13], which oversee 164 regional units, including state forest units and state hunting units. These enterprises are legal entities with the status of state enterprises under Article 62, Paragraph 3 of the Commercial Act. Their areas of operation are determined by the Ministry of Agriculture and Food. The structure of these enterprises consists of two levels: a Central Administration, and Territorial Units (state forest units and state hunting units).

The main activities of the State Forest Enterprises are laid down in Article 165 (1) of the Forestry Act as follows: implementation of forest management plans for state-owned forest territories; implementation of game management plans in state hunting enterprises and state forest enterprises; carrying out maintenance and/or restoration activities in state-owned forest territories, as specified in protected area management plans; organising and conducting forest protection measures in state-owned forest territories; organising and implementing anti-erosion measures; maintaining ecosystem diversity and conserving biodiversity within forest areas; afforestation of agricultural lands and creating new forests; protecting state-owned forest territories.

11. Forest cooperatives

Forest cooperatives are established mainly in the villages of the Smolyan region. Their main goal is the collective management of forests within the village's land, the purchase and sale of timber, the acquisition of forests, reforestation, and the supply of goods for the cooperative members. These include, among others:

- The Forest Owners and Consumer Cooperative "GORA" - https://gpk-gora.com/
- The Forest Owners and Consumer Cooperative "BORIKA" - https://borika.org/

[12] https://www.pefc.org/discover-pefc/our-pefc-members/national-members/council-for-sustainable-forest-management-and-certification-in-bulgaria

[13] Northeastern State Enterprise, Eastern State Enterprise, Northern Central State Enterprise, Northwestern State Enterprise, Southeastern State Enterprise, Southwestern State Enterprise, Southern Central State Enterprise

- The Forest Owners and Consumer Cooperative "ELA" - https://www.ela2001.com/
- The Forest Owners and Consumer Cooperative "Murdjov pojar" - https://murdjovpojar.com/
- The Forest Owners and Consumer Cooperative "Kostovitsa" - https://gpk-kostovitsa.org/
- The Forest Owners and Consumer Cooperative "Karlak-CC" https://gpk-karlak.com/

12. Other Forest organisations

Several active non-governmental organisations in Bulgaria are engaged in issues related to forest resource management and climate change. These include the World Wide Fund for Nature (WWF) Bulgaria, the Bulgarian Society for the Protection of Birds, the Association of Parks in Bulgaria, the Bulgarian Biodiversity Foundation, the "Za Zemiata" Association, and the "Green Balkans" Federation. These organisations work on various initiatives aimed at sustainable forest management, biodiversity conservation, and addressing the impacts of climate change.

National Hunting and Fishing Association - Union of Hunters and Fishermen in Bulgaria.

3. Forest land ownership structure

- According to State statistics, what is the ownership structure of the forest in your country (at State level)? Please include relative and absolute data of forest ownership types, including average size of public and private forests and the number of area of forests in each size category)

3.1. Data on national forests ownership structure

According to the 2023 Annual activity report of the Executive Forest Agency[14], the total area of the forests and forest areas in Bulgaria is 4 280 137 hectares or 38.56 % of the land area of the whole country. The area of forest territories is 3,953,595 hectares (92.4% of the total forest land). The area of agricultural lands that have the characteristics of a forest under Article 2 of the Forest Act ("forests on agricultural lands") is 326,542 hectares (7.6% of the total area)[15].

According to the Executive Forest Agency Report, the distribution of forest territories by type of ownership is as follows:

77.74% are state-owned. More precisely:

- 73.09 % forest areas - state ownership, managed by the state enterprises under Article 163 of the Forestry Act – or 2 889 898 hectares.
- 4,36 % state forests, managed by the Ministry of Environment and Water - or 172 362 hectares (including reserves and national parks).
- 0,29 % state forest areas, provided for the management of Training Experimental Forestry Enterprises – or 11 269 hectares.

11.16% are municipally owned – or 441 271 hectares.

9.59% are owned by individuals – or 379 125 hectares.

1.51% are owned by private legal entities - 59 670 hectares (out of which 16 493 hectares are owned by religion organisations).

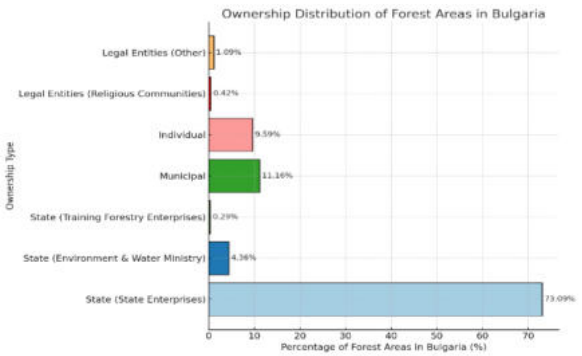


Figure created by the author, based on the figure from the 2023 Annual report of the Executive Forest Agency, page 5 ~~page 5.~~

[14] 2023 Annual report of the Executive Forest Agency (*Годишен отчетен доклад на Изпълнителна Агенция по горите за 2023 г.*): https://www.iag.bg/data/docs/Doklad_23_posleden_16.05.2024.pdf, pp. 5–6

[15] For specific definition on this wording see Section 3.2 below.

Forests on agricultural lands in Bulgaria cover 326,542 hectares. Their distribution type of ownership is as follows: 58.06% - municipal ownership – 189 597 hectares; 24.17% - owned by individuals - 78 915 hectares; 9.63% - state ownership – 32 454 hectares; 3.59% - owned by legal entities - 11 735 hectares (out of which 2 234 hectares are owned by religion organisations); 4.46% - forests, temporarily managed by municipalities - 14 558 hectares; 0.09% - forests, with unclear ownership – 283 hectares.

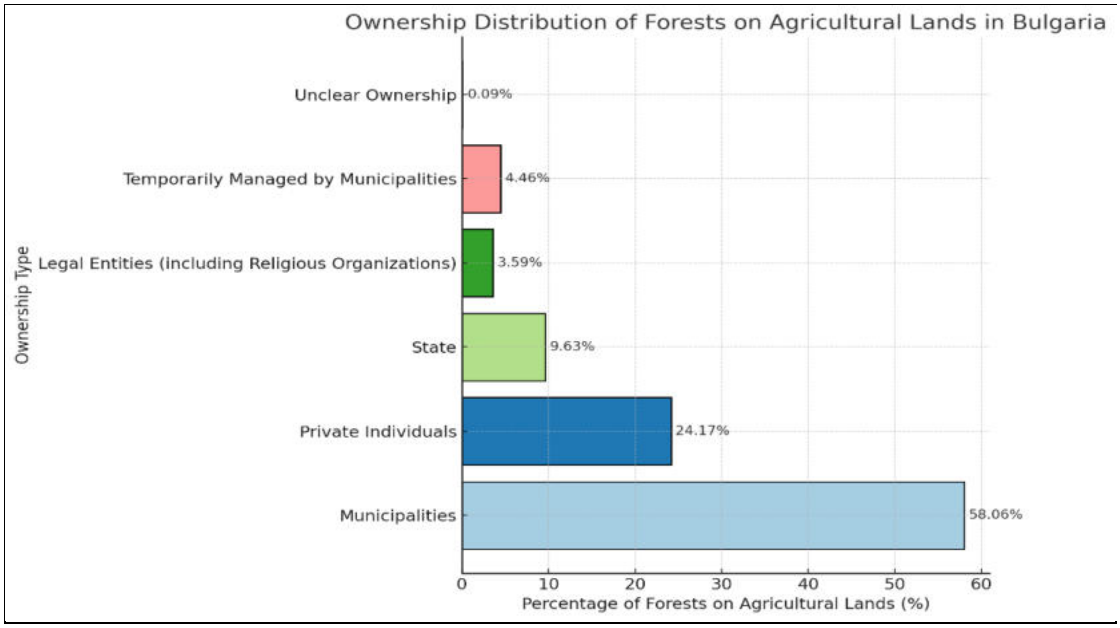


Figure created by the author, based on the figure from the 2023 Annual report of the Executive Forest Agency, page. 6, ~~*page 6.*~~

According to the information provided in the Analysis of the State of the Forest Sector in the Republic of Bulgaria for the Period 2013–2021[16], the number of forest property owners exceeds 1.5 million.

There are 111 municipalities owning forest territories with an area of over 1,500 hectares, and 135 municipalities with areas of up to 1,500 hectares.

Forest ownership by private individuals and legal entities constitutes 11.2% of the total forest area, primarily located in the regions of Veliko Tarnovo, Lovech, Montana, and Smolyan. This ownership is highly fragmented – 94% of forest properties have an area of up to 2.0 hectares. The average size of an individual forest property is less than 0.59 hectares.

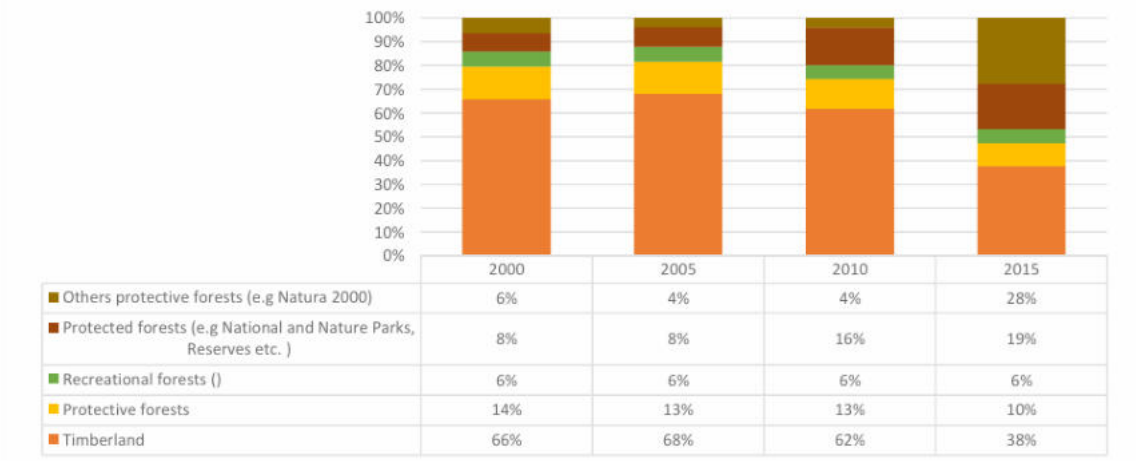
No other specific information on the average size of state-owned and private forest properties, or the number of forest areas in each size category, is available in the public sources.

To be noted also that, according to their main functions, forests are divided into forests with mainly timber harvesting and environment forming functions, protective and recreational forests and forests in conservation areas (Article 4 of Forestry Act). Between 2000 and 2010 the forests with timber production and environment forming function hold the highest share

[16] Annex 1 to the National Strategy for the Development of the Forest Sector in the Republic of Bulgaria until 2030, pp. 81-82

(62-68%). The share of those forests decreased dramatically in 2015 due to the inclusion of a large portion of forested areas in the European Environmental Network Natura 2000[17].

The predominant part of the forests, 71%, have protective and special functions, while forests primarily designated for timber production account for only 29%[18]. […] As of 2020, forest areas included in the European ecological network Natura 2000 make up over 57% of the total forest area[19].



	2000	2005	2010	2015
Others protective forests (e.g Natura 2000)	6%	4%	4%	28%
Protected forests (e.g National and Nature Parks, Reserves etc.)	8%	8%	16%	19%
Recreational forests ()	6%	6%	6%	6%
Protective forests	14%	13%	13%	10%
Timberland	66%	68%	62%	38%

Figure 6 Breakdown of forests by function and category of land, in percent, 2000-2015, Source: EFA

Source: *National Forestry Accounting Plan of Bulgaria, including Forest Reference Levels for the period 2021-2025, 2020, p.25*

As regards tree species, most forested area is covered by species of the Beech family (Fagaceae, 52% of forest areas), followed by Pine (Pinaceae, 27%), Birch (Betulaceae, 10%), Bean (Fabaceae, 4%), etc.

3.2. Definitions of forest ownership in your country

Please provide the definitions identified in the legislation applicable in your country following the guidelines shared with you.

- Forest owner

No definition of forest owner has been found in Bulgarian legislation. However, this is indirectly done through Article 22 of the Forestry Act, which provides that the right of ownership of forest territories belongs to natural and legal persons, to the state and to municipalities. Additionally, the provisions of the Forestry Act sometimes use the term “owner” (For example, Article 55(1), point 4, provides that in order to establish building rights on land plots within forest territories, the investor must submit a request for prior approval to the owner; Article 59(2) states that establishing building rights is not required when the construction is carried

[17] Source: National Forestry Accounting Plan of Bulgaria, including Forest Reference Levels for the period 2021-2025, 2020, p.25
[18] According to a consulted forest association this leads to overuse in forests with economic purposes.
[19] Source: Analysis of the State of the Forest Sector in the Republic of Bulgaria for the Period 2013–2021, p.74

out by the owner; and Article 63(1), point 4, provides that to establish an easement on privately owned land plots within forest territories, the application must be submitted to the owner).

– Forest holder

No definition of forest holder has been found in Bulgarian legislation.

– Forest manager

No definition of forest manager has been found in Bulgarian legislation. However, some terms that are close to the concept of "forest manager" do appear in the legislation. For instance, Article 133(1) of the Forestry Act states that the responsibility (including financial responsibility) for forest protection against diseases, pests, and other damages lies primarily with the persons to whom the territory has been assigned for management. This kind of wording is explained by the fact that the national law clearly sets out how the forests can be managed.

The management of state-owned forest territories that have not been allocated to agencies or legal entities, is entrusted to 6 State Forest Enterprises[20], established as per Articles 163-182 of the Forestry Act. They oversee 164 regional units, including state forest units and state hunting units. The primary activities of the State Forest Enterprises are laid down in Article 165 (1) (see above under Section 2.2).

Article 181 of the Forestry Act establishes the **management of municipal forest territories**, which is carried out in one of the following ways:

- By a municipal forestry structure, organised in one of these forms: a) A structural unit within the municipal administration; b) A commercial company where the municipality is the sole owner of the capital; c) A municipal enterprise under the Municipal Property Act.
- By state forest units or state hunting units based on a contract.
- By individuals or legal persons registered in the public registers under Articles 235[21] and 241[22], based on a contract.

[20] Northeastern State Enterprise, Eastern State Enterprise, Northern Central State Enterprise, Northwestern State Enterprise, Southeastern State Enterprise, Southwestern State Enterprise, Southern Central State Enterprise.

[21] Persons who provide forestry practice. Article 233 of the Forestry Act specifies that forestry practice includes the following activities:
1.Planning and organisation of afforestation activities.
2.Marking stands designated for logging.
3.Preparation of:
a) Assignments for forest management plans and programs, as well as for forest territory inventories.
b) Forest management plans, programs, and forest territory inventories.
c) Assignments, projects, plans, and programs for erosion and torrent protection, as well as biological reclamation of degraded areas.
4.Planning and organization of timber harvesting.
5.Planning and organization of non-timber forest product harvesting.
6. Preparation of projects for temporary forest roads and associated infrastructure.
(2) practice also includes the issuance of documents accompanying the respective activities.

[22] Article 241 of the Forestry Act provides that activities such as forest territory management, timber harvesting, forest inventory, and the preparation of management and development plans for forest territories, as well as the issuance of accompanying

The choice of management form and the selection of individuals or legal persons is determined by a decision of the municipal council. If the municipal forest territories exceed 1,500 hectares, management must be conducted through either municipal forestry structure or state units.

As regards the **management of forests owned by natural and legal persons**, Article 183 (1) of the Forestry Act envisages (and encourages) the establishment of forest associations with the goal of jointly managing and administering their properties and address the fragmentation of the forestry sector. Article 186 (1) of the Forestry Act further provides that the individuals and legal entities who own land in forest territories may carry out activities in their respective territories in the following ways:

1. Independently, if they are registered in the public registers under Articles 235 or 241 of the Forestry Act.
2. By contracting out to: a) State forest units or state hunting units ; b) Municipal forestry structures ; c) Individuals or legal persons registered in the public registers under Articles 235 or 241.

According to the National Classification of Occupations and Positions (NKOP) (*Национална класификация на професиите и длъжностите)*, with code 62103001, there is a position of a forest undertaking manager (*управител, горско стопанство*). According to the description provided this person plans, organises, and supervises activities related to the cultivation, protection, and utilisation of forests.

- Forest contractor

No definition of forest contractor has been found in Bulgarian legislation. Nonetheless, certain activities in the forests such as planning and organisation of afforestation activities, planning and organisation of timber harvesting, planning and organisation of non-timber forest product harvesting, preparation of projects for temporary forest roads and associated infrastructure, timber harvesting, forest inventory and silvicultural activities can be carried out by the persons registered under Articles 235 and 241 of the Forestry Act, which act in practice as contractors.

- Forest

The legal definition of a forest (*гора*) is established in Article 2 of the Forestry Act. According to paragraph 1, a forest is:

- Land covered by forest vegetation with an area of no less than one decare (0.1 hectares), with tree height at maturity of at least 5 meters, a stand width (measured between the trunks of the outermost trees) of no less than 10 meters, and a canopy projection covering no less than 10% of the land area.

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documents, must be carried out by legal entities registered in the public register of the Executive Forest Agency and holding a registration certificate.
The following entities are also listed in the register if they independently perform activities related to organisation and implementation of measures for the protection of state-owned forest territories and anti-erosion activities: State forest and hunting units, Municipal enterprises, Educational and experimental forest enterprises, Specialised territorial units of the Executive Forest Agency. Registration in the public register is not mandatory for legal persons involved in the development of regional plans for the management of forest territories.

- Areas in the process of regeneration that have not yet reached, but are expected to reach, a minimum canopy projection of 10% and tree height of 5 meters.
- Areas that have been temporarily deforested due to human activity or natural causes but are subject to regeneration.
- Protective forest belts and strips of trees with an area larger than one decare and a width of over 10 meters.
- Plantations within systems and facilities designed to protect against the harmful effects of water.
- Dwarf pine formations.
- Communities of tree or shrub species located along water bodies.

Paragraph 2 of the same Article specifies that the forest territory includes:

- Forests as defined in paragraph (1).
- Clearings, non-wood-producing lands, and other areas designated for forestry activities.
- Karst formations located within the lands defined in points 1 and 2.
- Protective forest belts smaller than the dimensions specified in paragraph (1), point 4.

3.3. Forest ownership types in your country

– Please provide a description of the types of forest ownership (e.g. public forest, private forest) identified in the legislation applicable in your country. Are there specific laws for certain types of collective, communal, vicinal or neighbourhood forests?

According to Article 17 of the Bulgarian Constitution, ownership in the Republic of Bulgaria is classified as either **private or public**. **Private ownership** can belong to natural persons, legal entities, the state, or municipalities. Objects owned by the state and municipalities are designated as either public or private property, depending on their type and purpose. **Public ownership** can only be held by entities with authoritative powers, specifically the state and municipalities. Publicly owned objects are intended to serve public interests or the needs of the territorial community. The exclusive ownership of the state over the objects specified in Article 18, paragraph 1, of the Bulgarian Constitution, is considered public ownership[23]. The legal framework governing these objects is established by law[24].

In particular with regard to **forest ownership**, following the restitution of forests and land plots within forest territories, happened in 1997 through the Law on the Restoration of Ownership of Forests and Lands from the Forest Fund (see Section 1.1. above), ownership of these assets in Bulgaria is now classified under the Forestry Act into three categories: Private ownership (Article 25); State ownership (Article 27); Municipal ownership (Article 28).

PRIVATE OWNERSHIP

Private forests are owned by natural persons and legal entities.

STATE OWNERSHIP

[23] Bulgarian Constitution, Article 18 (1) The State shall enjoy exclusive ownership rights over the underground resources; beaches and national thorough fares, as well as over waters, forests and parks of national importance, and the natural and archaeological reserves established by law.

[24] State Property Act (*Закон за държавната собственост*).

State forests, owned by the state, are classified into two categories: **public state forests** and **private state forests.**

Public state forests include:

- **Forest territories that are state property** and have been allocated for the management of other authorities to perform their functions, or for purposes related to national security, defense, health, education, or humanitarian activities.
- **Forest territories that are state property** and located within the innermost zones of sanitary protection areas for water sources and facilities for drinking water, domestic water supply, or mineral water sources.
- **Forest territories that are state property** and situated within protected areas – nature parks, natural monuments and protected sites[25]. Parks of national significance and nature reserves, listed in Annexes 1 and 2 to the Protected Areas Act, which serve to meet public needs of national importance, are classified as exclusive state property.
- **Forest territories that are state property** and part of areas designated for the protection of immovable cultural heritage.
- **Protective forest belts**.
- **Seed production areas**, including seed gardens, branch collections, geographical crops, arboretums, and forest nurseries of national importance.
- **Forest territories** within the 200-meter strip along Bulgaria's borders with countries that are not members of the European Union, as well as forest territories within the boundaries of systems and facilities designed to protect against the harmful effects of water.

Private State Forests: All other forest territories owned by the state that are not listed under the category of public state forests are considered private state forests.

MUNICIPAL OWNERSHIP

Municipal forests are those that do not fall under private or state ownership. These forests can be categorised as either **public municipal forests** or **private municipal forests**.

Public municipal forests include:

- **Forest territories that are municipal property** and have been provided for the management of other authorities to support their functions, or in connection with national security and defense, as well as for health, educational, or humanitarian activities.
- **Forest territories that are municipal property**, located within the innermost zones of sanitary protection areas for water sources and facilities for drinking and domestic water supply, or for mineral water sources.
- **Forest territories that are municipal property** and situated within protected areas.

[25] Bulgaria has 3 national parks, 11 nature parks and 55 nature reserves: https://eea.government.bg/zpo/en/index_download.jsp

- **Forest territories that are municipal property**, forming part of areas designated for the protection of immovable cultural heritage.

Private municipal forests: All other forest territories owned by the municipalities that are not listed under the category of public municipal forests are considered private municipal forests. Municipalities have the right to adopt their own regulations governing the use and management of municipal forests, in compliance with the Forestry Act.

The Forestry Act, does not explicitly define collective, vicinal, or neighbourhood forests. Article 2 (3) of the Forestry Act excludes from its scope of application parks and gardens located within urbanised areas, forests and lands within national parks and reserves, trees of forest species located in agricultural areas that do not meet the characteristics of a forest as defined in paragraph 1, and areas covered with forest vegetation within the boundaries of national, local, and railway roads.

In terms of collective management of the private forests, Article 183 of the Forestry Act, establishes forest associations as unions of natural and legal persons who are owners of land plots within forest territories. These associations are established under applicable legislation with the aim of jointly managing and administering their properties. However, according to the information provided in the Evaluation of the results of the implementation of the Strategic Plan for the Development of the Forestry Sector in the Republic of Bulgaria 2014-2023, for the period 2021-2023 and for the whole period by operational objectives and activities, such associations have not been formed.

- Are there well-established programs for forest land consolidation? Are there public bodies promoting or responsible for these programs?

In Bulgaria, forest land consolidation has been recognised as a key tool to improve forest management, particularly in addressing challenges posed by fragmented ownership among the state, municipalities, and private landowners. The primary public body responsible for overseeing and promoting this initiative is the **Ministry of Agriculture and Food**.

Article 38 of the Forestry Act provides the legal basis for forest land consolidation. Proposals for consolidation can be submitted by associations of forest landowners, State enterprises and municipalities to the Ministry of Agriculture and Food. The Ministry must respond in writing within two months. If approved, the interested parties must prepare a consolidation plan at their own expense.

The consolidation plan may include private forests, state-owned private forests, and municipal forests, provided their integrity is not compromised. The inclusion of state or municipal forests requires prior written consent from the Ministry of Agriculture and Food or the municipal council, respectively. Properties leased or rented for five or more years require tenant or lessee consent, with usage rights transferred to the consolidated property.

Protected areas, properties under legal disputes or encumbrances, and those involved in expropriation processes cannot be included in the plan. Properties with usage restrictions or located in disturbed areas may only be included with the owner's consent.

The consolidation process is supported by methodological guidance from the Executive Forest Agency; free provision of materials and data from land ownership bodies and geodesy, cartography, and cadastre agencies; expert assistance in preparing technical assignments for the plan. The plan must be prepared by certified experts and may incorporate data from agricultural parcel systems. The Ministry of Agriculture and Food appoints a permanent commission responsible for: verifying application data; approving technical assignments; accepting draft consolidation plans. The commission includes representatives from the Executive Forest Agency, municipal agricultural services, cadastral services, municipalities, and the applicants. Additional experts may be involved as needed. The commission conducts on-site inspections and reviews documentation, producing a protocol that serves as the basis for ministerial approval.

Once approved, the minister or an authorised official issues an order to amend the map of restored ownership. For areas with cadastral maps, changes to forest boundaries are made under the Cadastre and Property Register Act. Consolidated property owners receive official decisions and property maps, which hold the legal status of a notarial deed for ownership.

Changing the designated purpose of consolidated forest land is prohibited for 20 years, except for projects involving national security or defense; government-approved investment projects; municipal projects approved by the municipal council.

- According to a consulted forest association, while land consolidation is recognised as a key tool for improving forest management and is the responsibility of the Ministry of Agriculture and Food, it is not implemented in practice.

In 2016, the Ministry of Agriculture and Food launched an initiative to **purchase** forest land plots owned by private individuals, facilitated by State Forest Enterprises[26]. The objective is for the state to manage and protect old forests where no commercial activity has occurred in recent decades, in line with the **European Forest Strategy 2030**. This effort aimed to consolidate forest territories by merging small and fragmented properties belonging to owners who lack the capacity or willingness to manage them effectively. By incorporating these plots into state forests, the initiative sought to improve forest health and sustainable management and enhance protection against fires, illegal activities, and other adverse impacts. Between 2016 and 2021, 832 transactions were finalised for the purchase of forest land plots from private owners, covering a total area of 425.3 hectares, at a cost of approximately 3.2 million BGN. Under the rules adopted in 2023, forest land plots owned by municipalities and legal entities are now included in the initiative. Priority is given to properties that border state-owned forest territories with protective and special functions, as defined by the Forestry Act, as well as to properties owned by natural persons. For municipal properties, priority is granted to those predominantly containing stands classified as « old-growth forests ».

The consolidation initiative is funded through the "Forest Investments" Fund (*фонд "Инвестиции в горите"*)[27].

[26] See also Section 7 below.

[27] To support its financial stability and fund strategic forestry projects, the State Forest Enterprise has established two dedicated financial instruments: the Forest Investment Fund and the Reserve Fund. The Forest Investment Fund (Articles 178-179 of the Forestry Act) is primarily financed through a percentage of revenue from the sale of timber and other forest products harvested

3.4. Proof of ownership: Land registry and Cadastre

– How is ownership proved?

The registration of documents related to forest land transactions in the Property Register is the only valid proof of ownership.

Article 27, paragraph 1 of the Forestry Act defines forest territories as state-owned if they do not belong to individuals, legal entities, or municipalities. Thus the state's ownership rights over forests and forest territories are recognized by law[28]. The ownership of the state over land plots within forest territories is certified by one of the following documents: a deed of state ownership; a contract for the acquisition of ownership rights; a certificate issued by the municipal agricultural office at the location of the land plot, accompanied by a property map.

The ownership of the municipalities over land plots within forest territories is certified by one of the following documents: a deed of municipal ownership; a contract for the acquisition of ownership rights; a certificate issued by the municipal agricultural office at the location of the land plot, accompanied by a property map.

For natural and legal persons, ownership of forest land is certified by one of the following documents: a decision from the municipal agricultural office for the restoration of forest ownership; a notarial deed of ownership (primary document certifying immovable property ownership); a partition agreement (in cases of ownership of land of several owners).

Decision from the municipal agricultural office for the restoration of forest ownership

The Restoration of Ownership of Forests and Forestry Fund Lands Act (*Закон за възстановяване собствеността върху горите и земите от горския фонд*) governs the restoration of ownership rights to forests and lands included in the state forest fund. This law applies to properties nationalised under several laws[29]. Ownership is restored to Bulgarian natural and legal persons from whom it was taken during the communist period, as well as to their heirs and legal successors. Eligible individuals could file a restitution application with the Municipal Agricultural and Forestry Offices (now Municipal Agricultural Offices – *Общинска служба по земеделие*) by June 30, 1999. Those who missed this deadline can establish their right to restitution through a claim against the Municipal Agricultural Office. Ownership rights are proven using notarial

from state-owned lands. These funds are directed towards key forestry initiatives, including afforestation, forest land acquisition, infrastructure development, and participation in European co-financed projects. Additionally, resources may be used for building and maintaining facilities for game food storage, provided the projects are independently managed by the state enterprise or its regional units. The Ministry of Agriculture and Food is responsible for approving the allocation and utilisation of these funds, ensuring they are used effectively for sustainable forest management and conservation efforts.

[28] Conclusion made by the Supreme Court of Cassation in Decision No 221/2015 from 8.2.2026 on civil case No 1453/2015

[29] The Labour Land Ownership Act *(Закон за трудовата поземлена собственост)* (1946), the Ownership and Management of Private Forests Act *(Закон за собствеността и стопанисването на частните гори)* (1947), the Forest Management and Utilization Act (*Закон за стопанисване и ползване на горите*)(1948), the Forest Act *(Закон за горите)* (1958), the Decree-Law on Prosecuting Persons Responsible for Involving Bulgaria in World War II and Related Atrocities (*Наредба-закон за съдене от Народен съд виновниците за въвличане България в Световната война срещу съюзените народи и за злодеянията, свързани с нея*) (1944), the Decree on Mandatory Re-registration of Uncovered Agricultural Properties (*Указ за задължителното пререгистриране на непокритите земеделски имоти)* (1949), and subsequent laws, decrees, and acts issued by the Council of Ministers, the State Council, and the Presidium of the National Assembly.

deeds, notarised contracts, partition protocols, court decisions, or, if unavailable, local tax and land records, Labour Land Ownership Commission protocols, cooperative membership certificates, land maps, and other written evidence admissible under the Civil Procedure Code. Restoration is granted in the current condition, location, and boundaries of the land at the time of nationalisation, provided the boundaries exist or can be restored. If the original boundaries cannot be determined, equivalent land (in size and type, where possible) is restituted from the state forest fund in the same or neighboring area within the municipality. If existing or restorable boundaries cannot accommodate restitution, owners are compensated with equivalent land. Restitution is limited for forests in protected areas, which are categorised as exclusive state property.

The Municipal Agricultural Office issues decisions for restitution within existing or restorable boundaries. These decisions can be appealed to the regional court within 14 days.

The decision from the respective Municipal Agricultural Office for the restitution of the forest, accompanied by a property sketch, certifies the right of ownership and has the legal force of a notary deed confirming ownership of the property. If the forest was restored to a deceased common ancestor, the declarative notarial deeds are issued based on the decision and a certificate of inheritance for the deceased ancestor.

The Law on Ownership and Use of Agricultural Lands *(Закон за собствеността и ползването на земеделските земи)* allows owners to request the restoration of forests nationalized as state forests, but later converted to agricultural lands. Ownership is restored within real boundaries where possible. If boundaries do not exist, equivalent land in the respective settlement or neighboring area is restituted. With the owners' consent, this can also occur in another location after land consolidation is completed.

Notarial Deed of Ownership

Although less common for forests, **standard notarial deeds** may also be encountered. These are typically issued when the current owner acquired the forest through purchase from the individuals to whom it was originally restored.

Partition Agreement

The most common type of partition is a **voluntary partition**, but it can also occur through a **court decision for partition** (so-called judicial partition). This document allows the heirs of a common ancestor to divide the ownership of their inherited property. It has become standard practice for this document to serve as a means of distributing ownership. In a partition, each participant must receive a tangible share, monetary compensation, or another form of equivalent adjustment. The partition agreement or the court decision for partition is registered with the Registry office.

All transactions involving forest properties must be registered in the Property Register (*Имотен регистър*), which consists of entries for real estate properties. It records acts that establish or transfer ownership rights, create, modify, or terminate other property rights, as well as foreclosures, mortgages, and other legally mandated actions or facts. Entries are ordered by a Registration Judge for properties within their judicial district. The Property

Register is maintained by the Registry Agency (*Агенция по вписванията*) under the Ministry of Justice.

In cases involving newly established or subdivided properties, an up-to-date cadastral map must be provided. The Cadastre in Bulgaria is a system that collects, maintains, and stores fundamental data on the location, boundaries, and dimensions of real estate properties. It also includes information about ownership rights over these properties, ensuring accurate and up-to-date records. It is maintained by the Agency for Geodesy, Cartography, and Cadastre (*Агенция по геодезия, картография и кадастър*) under the Ministry of Regional Development and Public Works.

Both registers are regulated in the Law on the Cadastre and Property Register Act**.** The cadastral and the property register in Bulgaria are interlinked through a two-way system based on property identifiers. Core data for the property register is sourced from the cadastre, while ownership and property rights data for the cadastre are drawn from the property register. Their connection and data exchange follow regulations issued by the Ministers of Regional Development and Public Works and the Ministry of Justice. Both systems operate through interconnected computerized information systems.

Forest Inventory *(no function of ownership, only a descriptive tool)*

Article 7 of the Forestry Act provides that all forest territories, regardless of ownership, are subject to inventory every 10 years, valid until the next cycle. The terms and procedures for the inventory are laid down in Ordinance No 18 of 7 October 2015 on inventory and planning in forest areas**.** The main task of the inventory is creating an up-to-date database of forest resources; developing forest management maps and organising forest territories. In cases of natural disasters, an extraordinary inventory may be conducted for the entire forest territorial unit or part of it, funded by the state budget. Additional inventories may be conducted for specific forest territorial units or parts of them upon request and at the expense of the forest owner or the entity managing the forest territory. Although it is regulated by the Forestry Act, forest inventory has not been implemented in practice.

On top of the Forest Inventory, Article 146 of Ordinance No 18 establishes a **Forest Information System**. This information system contains spatial and attribute data on forest inventories, management plans, property rights, logging activities, forest composition, infrastructure, and environmental factors. It also includes registers related to forest nurseries, reproductive materials, and other regulatory requirements. The system operates on a Geographic Information System (GIS). All information must be published on the Executive Forest Agency's website[30].

[30] According to the information provided in the Evaluation of the results of the implementation of the Strategic Plan for the Development of the Forestry Sector in the Republic of Bulgaria 2014-2023, for the period 2021-2023 and for the whole period by operational objectives and activities (page 101) "*There is no unified Forest Information System that consolidates cadastral (ownership-based), silvicultural, forest management, timber harvesting, and other relevant data at the sub-compartment level. […]An integrated, publicly accessible national electronic information system for forests and the forestry sector has not been implemented. Additionally, a comprehensive forest cadastre has not been completed, and there is a need for improved quality of forest statistical data, as well as better analysis and forecasting for the development of the forestry sector. This system should integrate silvicultural, forest management, timber harvesting, and other relevant information at the sub-compartment level.*"

The WWF Danube-Carpathian Programme, Bulgaria, has developed and maintains a GIS platform for forests in Bulgaria. This platform provides information on forest compartments and sub-compartments, identified old-growth forests, protected areas, Natura 2000 sites, forest enterprise boundaries, and more[31].

For the Southwestern State Enterprise, a separate highly detailed and up-to-date system has been developed and is actively maintained by it[32].

- Is there a legal obligation to register ownership/property?

Yes. All transactions involving forest properties must be registered in the Property Register (only proof of ownership), in accordance with the Cadastre and Property Register Act. Forest territories are included in the Cadastre Register and specialised registers maintained by the Agency for Geodesy, Cartography, and Cadastre.

- Is there a registration fee?

Yes, registration fees are applicable, as follows:

Fee for Registration in the Property Register: The amount varies depending on the type of transaction (purchase, transfer, inheritance) and the value of the property. According to the **Tariff for State Fees collected by the Registry Agency** (*Тарифа за държавните такси, събирани от Агенцията по вписванията)*, the fee for registration of acts and documents subject to registration is 0.1% of the value stated in the document, but no less than 10 BGN. For more accurate fee calculations, there is a State Fee Calculator provided by the Registry Agency.

Fee for Preparing a Cadastral Map: In cases of property changes (e.g., division, consolidation), a fee is charged for the preparation of a new cadastral map, as determined by the Agency for Geodesy, Cartography and Cadastre. According to Article 49d of **Tariff No. 14 for the Fees Collected in the System of the Ministry of Regional Development and Public Works and by Regional Governors** (*Тарифа №14 за таксите, които се събират в системата на Министерството на регионалното развитие и благоустройството и от областните управители*), the fee for certificate for the acceptance of a project for amendments to the cadastral map and registers is 50 BGN (approx. 25 EUR) for a paper document and 35 BGN (approx. 17,5 EUR) for an electronic document in PDF format.The fee is charged per each new object included in the project for amendments to the cadastral map and registers. For projects with up to 50 objects, the fee is collected for each object individually. For projects with more than 50 objects, the fee is reduced by 50% for each object beyond the 50th. For expedited services, the fee is doubled.

Notarial Fees: These are mandatory for the sale, purchase, or donation of forest properties. According to point 1 of the Tariff for Notary Fees under the Notaries and Notarial Activity Act (Тарифа за нотариалните такси към Закона за нотариусите и нотариалната дейност) a fee of 20 BGN (approx. 11 EUR) is collected for issuance of declarative notarial deeds for

[31] The platform is accessible at: http://gis.wwf.bg/forests/
[32] It is available at available at: https://gori.uzdp.bg/#/

ownership of forests and lands from the forest fund of for their corrections and for preparation of contracts for voluntary partition for forests, and lands from the forest fund.

– Is there an official register of forest owners and of forest holdings? Is it shared with agricultural registers? Is it harmonized with the general property/ownership register?

There is no specific, separate register for forests owners, different from the property register. Forest property is recorded in the same system as other types of property.

There is no unified register combining forest and agricultural properties. However, both types of properties are part of the Cadastre Register, which allows for coordination between the information therein. As already mentioned above, the Cadastre Register and the Property Register are synchronised and interlinked. Any new owner or change is reflected in these databases.

– Is the Cadaster/register well updated and reflecting real forest owners/holders?

The Bulgarian law requires the Property register and Cadaster to be updated. The information in the property register is entered at the time of the transaction registration of the registry office and is accurate and up-to-date.

The Cadastre Register is maintained and updated by the Agency for Geodesy, Cartography, and Cadastre, with every change in the status of real estate properties reflected in them[33]. This is carried out by the Regional Offices of the Agency for Geodesy, Cartography and Cadastre, based on applications submitted by property owners and data provided through legally established procedures.

[33] According to the Report on the Implementation of the Program Budget of the Agency for Geodesy, Cartography, and Cadastre for the First Half of 2024 (*Отчет за изпълнението на програмния бюджет на Агенция по геодезия, картография и кадастър за първото полугодие на 2024 г.).*

4. Rights and obligations: forest owner/holder and forest contractor

4.1. Overview

- According to the legal and regulatory framework what are the rights and obligations of forest owners/holders and forest managers in your country?

Forest owner

Rights:

- Subsidies: Although not stipulated in the law, the forest owners have the right to apply for financial support under the relevant programmes, funded by the EU fund.
- Forests are exempt from property tax
- Decision on forest management practices: Forest management is at the owner's/holder's/manager's discretion but must comply with requirements of the forest management plan and the national law.
- Harvest rights: Owners of forests are the owners of the forest resources produced on their forest, including wild forest products, and have the right to use them in accordance with the law and forest management plan.

Obligations:

- Sustainable Management: Article 3(2) of the Forestry Act provides that the activities in forest territories must be carried out in a manner that does not cause damage to plant and animal species, their habitats, the soil, water bodies, or elements of the technical infrastructure. Article 29 of the Forestry Act further requires the owners of forest territories to exercise their right of ownership over them in a way that does not worsen their condition and does not cause harm to other owners or to society.
- Registration: Ownership of forests must be registered in the Property Register.
- Prevention of forest fires and other risks: Owners must adopt and implement measures to the prevention, detection, and extinction of forest fires. Owners are also obliged to apply measures against the erosion, pests and other damages.
- Restrictions on land use changes: Changes in forest use require authorisation. A change of forest use in burned lands is prohibited for at least 20 years.
- Authorisations: Timber harvesting requires the corresponding logging license. Moreover, mining and other activities require a land-use change and special permits.

- Protection of the forest territories: The protection of forest areas covers actions to prevent and establish violations of the provisions of the law. The activities to prevent violations are organised by the owners of the respective forest territories at their expense (Article 187 of the Forestry Act). In the forest territories owned by natural persons, legal entities and their associations, with a total area of up to 2 hectares inclusive, the protective actions are organised and financed by the State Forest Enterprises.

Limitations:

- The restrictions include prohibitions on land-use changes, regulations on resource extraction, and requirements for biodiversity conservation. Additionally, citizens have certain rights to access and collect products from forest areas, but these activities are subject to specific legal provisions to balance public use with ecological sustainability.
- Natural and legal persons who are the owners of forest land can operate in their own territory only when they are registered in the publicly register of Executive Forest Agency (Article 230 et seq. of the Forestry Act) or by assigning the activities to the state forestry and state hunting units, municipal forest structures, or individuals/traders entered in the registers of Executive Forest Agency.
- Hunting rights are not linked to ownership and require a separate permit.

Forest holder/manager

There are no specific requirements for forest managers/holders, as they are not explicitly regulated under the national Forestry Act. In general, they should manage the forest in the best interest of the owner and according to their instructions. Moreover, they have to comply with forest management plans.

4.2. Legal rights of the forest owner/holder

- Right to financial support/tax exemptions/subsidies? What are the requirements?

The right to financial support for forest owners is not regulated under Bulgarian legislation. However, owners are eligible to apply for funding (subsidies) under the **Strategic Plan for the Development of Agriculture and Rural Areas 2023-2027** (*Стратегическия план за развитие на земеделието и селските райно 2023-2027 година*) for the following measures:

- **II.A.13 - Forest ecological activities** – Preservation, designation, and expansion of old-growth forests; protection of nesting habitats for diurnal and nocturnal birds of prey and the black stork; permanent marking and conservation of at least 10 biotope trees per hectare, including trees with cavities and nests serving as refuges for rare and protected species; establishment of protective/buffer strips of at least 20 meters width without commercial use; maintenance of standing and lying deadwood at a minimum of 15% of the stand's volume; exclusion of forest areas with slopes greater than 35° from commercial use; extending the regeneration period of regeneration felling by one age class or transforming stands into "continuous-cover forests".

- **II.A.14 - Natura 2000 support for forests** – This measure aims to compensate forest owners and managers for lost income resulting from conservation restrictions imposed within Natura 2000 sites[34].
- **II.A.15 - Maintenance of newly created and restored forests** – Provides annual per-hectare payments to support the maintenance of newly established or restored forests.
- **II.G.10 - Afforestation and restoration** – Includes afforestation of agricultural and non-agricultural lands, recovery of forests damaged by wildfires, natural disasters, and catastrophic events, as well as the restoration of protective forest belts.
- **II.G.11 - Prevention of forest damage from wildfires, natural disasters, and catastrophic events** – Funds activities related to the creation, improvement, and maintenance of fire prevention infrastructure and other preventive measures against forest fires, as well as the restoration of affected forests.
- **II.G.12 - Improving the health and resilience of forest ecosystems** – Supports activities such as thinning operations to enhance the health and stability of forest territories.

This funding framework aims to promote sustainable forest management, biodiversity conservation, and resilience against environmental threats. The requirements for application are described in the Strategic Plan for the Development of Agriculture and Rural Areas 2023-2027, and they are different for each measure.

- A consulted forest association affirmed that, although private forest owners are eligible to apply for financial support under the Strategic Plan for the Development of Agriculture and Rural Areas, only a limited number have successfully taken advantage of this opportunity.
- The association also noted that forest cooperatives and associations – entities formed by forest owners for the joint management of their forests – remain ineligible for financial support. Although these bodies do not hold ownership rights, they are authorised to manage specific forest areas.

Under Article 10(3) of the Local Taxes and Fees Act (*Закон за местните данъци и такси*) forests are exempt from property tax.

- Is there a right to decide about the forest management practices in their forest land?

Forest owners have the right to make decisions regarding the management of their forested land; however, they must comply with applicable legal regulations and forest management plans. Any activity, such as logging or afforestation, must be in accordance with forest management plans and approved by the Executive Forest Agency (Article 101 of the Forestry Act). Forest owners can manage their forest independently, if they are registered in the public registers under Articles 235 or 241 of the Forestry Act. Otherwise, they have the authority to assign supervision over the implementation of forest management, hunting management, and fire protection plans to the persons registered under Articles 235 and 241 of the Forestry Act

[34] However, according to a consulted forest association, an effective mechanism for compensating forest owners whose land falls within the ecological network has yet to be established. At present, compensation schemes apply only to agricultural landowners, leaving forest owners unaddressed.

(Articles 144 and 145 of Ordinance No 18). This decision must be approved by the relevant management body, depending on the ownership of the forest. For state-owned forests, the management board of the state forestry enterprise must give its approval. In the case of municipal forests, the municipal council is responsible for authorising the supervision. If the forests belong to a private landowners' association, the decision must be made by the association's management board.

Additionally, the Executive Forest Agency has the power to assign supervision specifically for fire protection activities and hunting management plans. The supervision itself must be carried out by registered professionals. Following supervision, a detailed report must be prepared, analysing the implementation of forestry activities. The report includes an assessment of compliance with the plans, identifies any shortcomings, and provides recommendations for corrective actions. If necessary, the report may also propose modifications to planned activities to improve forest management. Once completed, the report must be submitted to the respective RFD for review. Furthermore, to ensure transparency, the supervising authority is required to publish the report on its official website.

Owners are not permitted to undertake activities that harm the ecosystem, disrupt biodiversity, or violate forest protection regulations (Articles 3 and 29 of the Forestry Act).

Articles 183 and 184 of the Forestry Act regulate forest associations, which bring together individuals and legal entities owning land within forest territories to facilitate sustainable forestry practices and to ultimately enhance cooperation among small forest owners and promote sustainable forest management. The Executive Forest Agency provides support to eligible associations, including assistance with forest management plans, land consolidation, training, infrastructure development, and forest protection. To qualify, associations must manage at least 100 hectares of merged land, engage in forestry operations, and ensure certification of their forests. However, those penalised for forestry violations are ineligible for support for one year.

- Is there a right to harvest?

Forest owners have the right to harvest resources from their forests, which includes both timber extraction (Article 111 (2), point 1 of the Forestry Act) and non-timber product collection (Article 120 (4) of the Forestry Act, subject to regulatory compliance and environmental considerations.

Owners are permitted to use **timber** from their own forest territories – which as per law means extraction and/or transaction of timber resources. They can carry out logging activities, provided they adhere to the forest management plan. The harvesting of timber requires official marking and approval (permit) from the relevant authorities, such as the Executive Forest Agency or RFDs (see also Section 4.3).

Under Article 117 of the Forestry Act, the use of **non-timber forest products** includes the extraction and management of resources such as resin, pinewood, hay, bark, bast, seeds, mushrooms, medicinal and aromatic plants (or their parts), lichens, mosses, forest fruits, greenery, Christmas trees, deciduous fodder, and the capture of non-game animals. When mushrooms, forest fruits, medicinal, or aromatic plants are gathered for personal use rather

than commercial purposes, they may be collected freely and without charge (Article 119(2) of the Forestry Act). When the harvesting of non-timber forest products is conducted as a commercial activity, it is only permitted if explicitly outlined in an approved forest management plan and with the permit of the owner. The collection of non-timber products must comply with legal regulations and respect third-party rights (Article 119(1) of the Forestry Act).

4.3. Limitations to the rights of forest owner/holder

- Is there a limitation to change the land use of the land (from forestry to agriculture and/or urbanization)?

The conversion of forest land for other purposes, such as agriculture or urban development, is strictly regulated under the Forestry Act and subject to oversight by the government, regional forestry bodies, and environmental authorities.

First of all, **general restrictions** are in place. Under Article 38 (21) of the Forestry Act, a 20-year restriction is imposed on changing the designation of forest land after it has been consolidated. However, exceptions apply if the land-use change is necessary for: national security and defense purposes; investment projects approved by the Council of Ministers; municipal investment projects approved by the municipal council.

As of March 8, 2011, land-use changes and construction are permanently prohibited on forest lands that were acquired from the state through land swaps before the Forestry Act was published in the State Gazette - §3 of the transitional and final provisions. This restriction applies regardless of ownership transfers, meaning that even if the land is later sold or transferred, the ban remains in effect. The only exception is if the forest land is reacquired by the state.

Land-use changes are strictly prohibited in certain protected coastal zones (Zones A and B) under the Black Sea Coast Spatial Planning Act, unless they fall under exceptional legal provisions. Prohibitions exist also in protected areas, including national parks, nature reserves, and Natura 2000 zones. Such changes are generally forbidden, except in exceptional cases where they meet stringent environmental and legal criteria.

When permitted, land-use change remains strictly regulated. Pursuant to Article 73 of the Forestry Act, change in the designation of forest land is allowed only for specific purposes[35].

The approval of land-use changes depends on the ownership and scale of the land involved:

- For publicly owned state forest land, approval must come from the Council of Ministers, based on a proposal from the Ministry of Agriculture and Food.
- For smaller private forest plots (up to 50 decares), decisions are made by a commission within the RFD.

[35] This includes: Transport infrastructure, such as ports, airports, railway stations, and bus terminals; Industrial and agricultural facilities, including factories, farms, and fishery operations; Resource extraction sites, such as mines and landfills; Energy and water facilities, including power plants, reservoirs, wastewater treatment plants, and hydrotechnical structures; Linear infrastructure, such as roads, railways, and water channels; Expansion of urbanized areas where approved municipal spatial plans exist; National security and environmental projects, approved by the Council of Ministers; Ski lifts, ski slopes, wind farms, and solar parks.

- Larger private forest land changes are reviewed by a commission within the Executive Forest Agency.

A preliminary assessment request must be submitted to the relevant ministerial or regional authority, and a decision must be issued within one month. If the land-use change is approved, the applicant must fulfill several financial and legal obligations. A conversion fee must be paid within three months of the approval decision. If the fee is not paid, or if construction does not begin within three years (or four years for infrastructure projects), the approval is revoked.

For state and municipal forest land, an official land valuation is conducted by certified independent assessors under the Independent Appraisers Act (*Закон за независимите оценители*). The valuation must include the cost of the timber resources on the land. If servitude rights (e.g., easements for utilities) are created on public forest land, an additional compensation afforestation fee must be paid. The funds collected must only be used for afforestation and the creation of new forests.

An additional exemption exists for national and municipal projects deemed of high public importance under the State Property Act and the Spatial Development Act. In such cases, the land must become public state or municipal property to allow for the planned development.

- Is there a legal limitation to the right to harvest? Is there a ban on clear cutting?

Logging activities in Bulgaria are strictly regulated to ensure sustainable forest management, ecosystem preservation, and compliance with national forestry plans. The legislation provides detailed guidelines on permitted and prohibited logging practices, required approvals, and specific management practices for protected areas.

The regulation is provided in Chapter 4, Section III of the Forestry Act and Ordinance No 8 of 5 August 2011 on forest logging. As per Article 101 of the Forestry Act, all logging operations must be conducted to support forest regeneration, maintenance, and improvement, in line with approved forest management plans or programs. Logging in protected areas must follow the specific regulations outlined in their management plans and declaration orders.

A written permit is required before any logging operation and can be issued by:

- The Director of the relevant State Forestry or Hunting unit (for state-owned forests).
- An authorised municipal official with a forestry degree, registered for forestry practice (for municipal forests).
- A registered forestry expert contracted by a forest association or private owner.

The permit is issued only for properties with clearly marked boundaries, and the responsible permit holder must oversee the prevention of illegal logging and ensure proper site clearance.

Logging operations must follow a technological plan (Article 52 of Ordinance No 8)[36].

[36] The plan outlines: logging techniques and transportation methods, storage locations for harvested timber, safety measures for workers, protection of remaining trees, soil, and young forest growth, designated extraction routes and temporary road

Logging in private forests can be conducted only by registered forest owners (under 235 or 241 of the Forestry Act) or through contracts with state, municipal, or registered natural or legal persons (Article 186 of the Forestry Act).

Clear-cutting in Bulgaria is strictly regulated and is only permitted under specific conditions to ensure forest regeneration and environmental protection – as laid down in Article 32 of the Ordinance No 8 of 5 August 2011 on forest logging. To protect forest ecosystems, clear-cutting is generally prohibited (Articles 104 and 105 of the Forestry Act), except in cases of:

- Forest protection and public safety measures – Activities aimed at safeguarding forest territories or ensuring the health and safety of citizens.
- Preservation of cultural heritage and research – Conservation of cultural assets based per Ministry of Culture recommendations and scientific research activities.
- Harvesting of damaged timber – Removal of wood affected by biotic or abiotic factors (e.g., pest infestations, natural disasters) to maintain forest health[37].
- Final phases of regeneration logging – Execution of the last stages of regeneration felling where natural forest renewal has already occurred.
- Habitat and species conservation – Restoration and protection of natural habitats and species, particularly those listed in Annexes 1, 2, and 3 of the Biodiversity Act, provided they fall within protected zones and are approved by the Regional Environmental and Water Inspectorate.
- Wildlife management and infrastructure development – Activities such as clearing hunting corridors, establishing wildlife feeding areas, and creating game clearings, as specified in hunting management projects. Construction of forest roads is also permitted.
- Execution of property rights agreements – Implementation of contracts for construction rights, usage rights, or easements in designated forest areas.
- Implementation of approved fire protection plans – Activities related to fire prevention and control, in accordance with officially approved fire management plans.

Other restrictions include:

- Merging of clear-cut areas over 2 hectares in low-stemmed forests (except for acacia).
- Logging in mountain pine and rhododendron forests, except for sanitary purposes.
- Cutting unmarked trees, except where specifically permitted.
- Harvesting beyond the approved limits set in forest management plans, unless due to natural disasters or land-use changes.
- Timber harvesting at night is strictly forbidden.

Article 65 of Ordinance No 8 mandates that forests within **protected areas and Natura 2000 zones** be managed to maintain or restore their favourable conservation status. Key principles include promoting native species, restricting afforestation with non-native trees except for

[37] On this aspect, to note that a consulted forest association mentioned that the utilisation of timber damaged by biotic and abiotic factors remains a major challenge for forest owners. The existing regulatory framework should be adapted to better support and incentivise owners in making use of such wood. Promoting the utilisation of damaged timber would help minimise forest losses, reduce the risk of wildfires, and limit the spread of pests.

erosion control, and allowing natural regeneration in areas affected by large-scale disturbances. Clear-cutting and uniform-aged forest management are limited, while deadwood preservation (8-10% of forest volume) is encouraged, except in fire-prone areas. The regulation also protects hollow trees and old clusters, promotes environmentally friendly logging techniques, and restricts logging near permanent water bodies to 5% of standing volume within 15 metres.

- Are there limitations to carry out non-forest activities in forest land (like mining, energy plants, etc.)?

Yes. Non-forest activities such as mining, construction of wind turbines, or photovoltaic installations in forest areas are allowed only after a change in land designation and the issuance of a permit by state authorities. These activities are often prohibited in protected areas.

Under the Underground Resources Act *(Закон за подземните богатства)* (Article 78), those granted permits for exploration or mining must adhere to legal, environmental, and land protection regulations. Articles 69 and 70 of the Forestry Act regulate the right to use land in forest areas such as: prospecting and exploration of underground resources with a permit under the Underground Resources Act and prospecting activities under a mining concession, following a detailed project. The right to use forest land for such activities depends on ownership and is granted by:

- **State property**: Executive Director of the Executive Forestry Agency.
- **Municipal property**: Mayor, after approval by the municipal council.
- **Private property**: Landowner grants the right.

To obtain land use rights, an application must be submitted to the relevant entity (Executive Forestry Agency, mayor, or private owner)[38]. The competent entity evaluates applications and may approve or deny them. For mining, exploration, or archaeological fieldwork, an opinion from the state forestry or hunting unit is required before a decision is made.

- Are there specific limitations to carry out agricultural activities, like extensive grazing or temporary cultivation, on forest land?

Grazing in Bulgaria's state and municipal forest areas is regulated under Articles 123-125 of the Forestry Act and its Rules for implementation of Forestry Act to ensure sustainable land use and forest conservation. Livestock owners must pay an annual fee set by the Ministry of Agriculture for state forests or by the municipal council for municipal forests. Once paid, they receive a permit specifying the grazing area, type and number of animals allowed, fees paid, and access routes. These permits follow a standard format approved by the Executive Forest Agency.

In privately owned forests, grazing is only permitted with written consent from the landowner.

[38] Applications for state or municipal forests must include: property sketch and cadastral coordinates, environmental approvals under the Environmental Protection Act and Biodiversity Act, approved reclamation project, if surface soil removal is involved, bank guarantee covering reclamation costs.

To protect forest ecosystems, grazing is prohibited without a shepherd, in erosion-prone areas, arboretums, nurseries, young plantations, and regenerating forests. Nighttime grazing is entirely banned. Additional restrictions under the Forestry Act prohibit grazing in state hunting reserves, intensive game management areas, and protected zones with legal restrictions. In protective and recreational forests, grazing is only allowed if explicitly permitted by law. Goats must be kept in separate herds to reduce their impact on vegetation.

Article 108 of the Rules for implementation of Forestry Act, further establishes that grazing is allowed only in the areas explicitly specified in the permits, and it must comply with forestry management projects, plans, and programs. Even when grazing is allowed, designated routes for livestock movement and access to water must be carefully planned, particularly in cases where they pass through restricted areas.

Each year, by the end of February, municipal mayors issue an official order outlining the specific forest areas where grazing is restricted or prohibited. These areas are designated on the basis of the written requests by the directors of state forest enterprises or state game enterprises – for forest territories that are state-owned; district mayors, mayors of municipalities, and mayoral deputies – for forest territories that are municipal property and the owners – for other forest territories. This order is publicly announced in municipal offices and on the official municipal website. Furthermore, all grazing regulations must comply with existing restrictions and conservation plans for protected areas and zones, ensuring that livestock grazing does not endanger ecologically significant or environmentally sensitive areas.

The number of livestock permitted to graze in forest and forest fund lands is determined by Article 109 of the Rules for implementation of Forestry Act, which takes into account pasture productivity, vegetation cover, and the overall condition of the grazing areas[39].

As regards **temporary cultivation** on forest land, forest territories cannot be used for agricultural purposes without an official change in land designation.

- Is hunting right linked to ownership right? Is it considered a forest activity or does it have specific regulations?

In Bulgaria, the right to **hunt is not directly linked to forest ownership.** Hunting is regulated separately under the Law on Hunting and Game Protection and is not considered as a forest activity[40]. While forest owners have property rights, they do not automatically have hunting

[39] The following minimum land area requirements ensure that overgrazing does not degrade the forests: In high-stem forests, large livestock require at least 12 decares (dka) per head, while sheep or pigs need a minimum of 2.5 dka per head; In coppice forests, large livestock require 10 dka per head, and sheep or pigs need 2 dka per head; In mountain and forest pastures, large livestock need 2 dka per head, while sheep or pigs require 0.5 dka per head; In clear-cut areas designated for artificial regeneration, goats require at least 12 dka per head to prevent damage to young forest growth.

[40] "Forest management activities" are defined in Additional provisions to the Forestry Act, para.1, point 19. The national provision refers to all operations related to the maintenance, protection, and conservation of forest areas, as well as timber harvesting. These activities also include the development of forest management plans and programs, ensuring sustainable use and preservation of forest resources.

rights on their land. Instead, hunting is restricted to designated hunting estates and zones, and it requires special permits issued by the relevant authorities[41].

The right to hunt includes hunting, acquiring game, trophies, and game products, but also comes with the obligation to protect wildlife (Article 21 of the Law on Hunting and Game Protection). In Bulgaria, game animals are state property, except in specific cases outlined by law (Article 2 of the Law on Hunting and Game Protection). To obtain a hunting license, individuals must: be adults; complete a specialized hunting course lasting 3 to 6 months; pass a theoretical and practical exam (Article 22 of the Law on Hunting and Game Protection). Hunting is only allowed for those with: a membership card and a hunting permit and annual hunting ticket, issued by the Executive Forestry Agency (Article 23 of the Law on Hunting and Game Protection).

Hunting is managed by population zones rather than by land ownership boundaries. The country is divided into hunting management areas, regardless of land, forest, or water ownership. Hunting facilities on private land can only be built under a contract with the landowners and must follow hunting management plans (Articles 7 and 38 of the Law on Hunting and Game Protection). Hunting is strictly prohibited in reserves and national parks to protect wildlife conservation areas[42].

- Are there citizens' rights to collect wild products in forest land? Are they linked to the ownership right or not?

Bulgarian law (Articles 117-120 of the Forestry Act) regulates the use of wild forest products based on their intended purpose. Commercial collection is only permitted if specified in an approved forest management plan. When it comes to personal use, individuals may gather mushrooms, fruits, and medicinal plants, provided they respect third-party rights and environmental laws.

Focus on commercial use: The harvesting and trade of wild forest products from state-owned forests are managed by the Director of the State Forest Enterprise or an authorised official. This is done through: assigning contracts for harvesting and selling wild forest products in their raw or processed forms; leasing specific forest areas for commercial collection; issuing permits for the collection of non-timber resources.

Municipal forests follow a similar system, with the municipal council determining how wild forest products may be used. In privately owned forests, landowners have full control over how these resources are managed if used for commercial purposes.

To ensure long-term sustainability, contracts for wild forest products harvesting can be issued for up to 10 years, detailing which products can be harvested, where, in what quantity, and at what cost[43].

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[41] According to a consulted forest association, Bulgarian legislation allows forests to be privately owned while the game within the same territory remains state property. This arrangement often leads to conflicts between the two parties.

[42] Article 7 (2) the Hunting and Game Protection Act and Article 21, point 10 of the Protected Areas Act.

[43] According to the information provided in the Evaluation of the results of the implementation of the Strategic Plan for the Development of the Forestry Sector in the Republic of Bulgaria 2014-2023, for the period 2021-2023 and for the whole period by operational objectives and activities (page 23): „*The analysis of data on the use and payment for wild-growing mushrooms, including truffles, indicates that the current regulatory framework is ineffective. The existing rules, which allow for the payment of a fixed permit*

From January 1, 2024, a new permit system requires that anyone collecting wild forest products in state and municipal forests for commercial purposes to obtain a monthly permit issued by the State Forestry Enterprise. The permit fee includes various administrative and environmental management costs, reinforcing Bulgaria's commitment to responsible forest resource management.

Environmental protection restrictions: Nature conservation legislation impose additional restrictions. Under the Biodiversity Act there are strict protections for threatened animal and plant species listed in Annex No. 3, ensuring their survival in the wild. For protected animal species, the law prohibits any intentional harm (Article 38 of the Biodiversity Act). This includes capturing, killing, chasing, or disturbing them, particularly during critical periods such as breeding, raising young, hibernation, and migration. Their nests, eggs, and breeding sites are also safeguarded – damaging, removing, or relocating them is strictly forbidden. Additionally, habitats that serve as resting or gathering sites, especially along migration routes, must not be destroyed or altered. Even collecting dead specimens from the wild is not allowed, ensuring that every aspect of the ecosystem remains undisturbed. The destruction or removal of plant species from Annex No. 3 is equally prohibited as per Article 40 of the Biodiversity Act. Picking, cutting, uprooting, or damaging plants in their natural habitat is strictly forbidden, regardless of their growth stage. Furthermore, laws ban the possession, cultivation, transportation, trade, and export of wild-collected specimens, ensuring that these species are not exploited for commercial purposes.

- Are there rights to access (walking) on forest land? Are there specific regulations for public use of forest land, hiking, riding, biking, etc.?

As a general principle, access to forest areas is free and at one's own risk, provided that visitors follow the instructions of the forest administration and landowners (Article 144 of the Forestry Act). However, exceptions apply in certain cases:

- Forests managed for national security and defense have restricted access, determined by the relevant government body.
- Protected areas may have limited or restricted access, based on their designation orders or management plans.
- Access to logging sites and forest nurseries requires a special permit, issued by the entity managing the area.

Article 145 of the Forestry Act further provides that the forest properties cannot be fenced or obstructed in a way that prevents the free movement of people, wildlife, or water, except in cases explicitly allowed by law.

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fee regardless of the harvested quantity, result in inefficiencies in control and enforcement. Additionally, this system leads to economically inadequate, unjustified, and disadvantageous pricing for this public natural resource."

The Director of the RFD may impose temporary access restrictions for up to three months (Article 146 of the Forestry Act) for two reasons: 1) to protect forests and wildlife; 2) for public health and safety[44].

These restrictions can be requested by state forestry units, hunting units or private forest owners. Any restriction must be publicly announced on official website of the RDF and at the local municipal office. Barriers and signs must be installed to inform visitors.

Vehicle use and riding in forests is regulated by Articles 148-150 of the Forestry Act. Trucks and animal-drawn vehicles are only permitted when used for forestry, agriculture, or hunting activities. Off-road vehicles such as ATVs and motorcycles are restricted to designated and marked trails to minimize their impact on the terrain.

For non-motorized activities, bicycling and horseback riding are generally allowed, except in areas where specific restrictions apply. However, if a municipality requests that certain forest roads be opened for unrestricted vehicle access, the RFD can approve this, provided that the municipality takes responsibility for road signage, maintenance, and repairs. To ensure public access, landowners and users are prohibited from fencing off or restricting movement on public forest roads.

To balance outdoor recreation with conservation, tourist activities in forest areas are subject to specific rules. Driving and horseback riding are prohibited on designated tourist trails, except where these trails overlap with forest roads or designated routes. Any new tourist trails or routes must receive prior landowner consent before they can be established.

Additionally, public and sporting events in or near forest areas require prior approval from the RFD. Thus the national law ensures that large gatherings, such as organised hikes, races, or festivals, do not disrupt ecosystems, endanger wildlife, or interfere with forestry activities.

4.4. Forest owner/holder obligations and requirements.

- Which requirements or obligations regarding forest management are imposed on owners?

As mentioned above, Article 3(2) of the Forestry Act provides that the activities in forest territories must be carried out in a manner that does not cause damage to plant and animal species, their habitats, the soil, water bodies, or elements of the technical infrastructure. The management of the forest areas covers the activities of afforestation, protection against erosion and floods and felling in the forests (Article 87 of the Forestry Act).

All management activities in the forests must comply with the forest management plans and legislative requirements. These plans define silvicultural methods to ensure sustainable and environmentally sound use of forest resources (Article 61 of Ordinance No 18 of 7 October 2015 on inventory and planning in forest areas).

The activities in the forest areas are organised and/or carried out by natural persons and by traders who are registered in public registers with the Executive Forest Agency and hold a certificate of registration, except in cases where the law does not require registration. The

[44] Forest owners can only be denied access to their own property if the restriction is imposed for public health and safety reason.

requirements to these persons are specified in Articles 233 - 236 and 241 -243 of the Forestry Act:

- Only registered natural persons can plan and organise the afforestation activities; mark the plantations to be felled; prepare forestry plans and programmes and for inventories of forest areas; assignments and projects, plans and programmes for protection against erosion and floods for biological reclamation of disturbed land; plan and organise of timber and non-timber forest products harvesting; preparation of projects for temporary forest roads and their facilities (Article 233 and 234 of the Forestry Act).
- The activities of forest area management, timber extraction, forest area inventory, preparation of plans and programmes for forest area management and development, as well as the issuance of the accompanying documents can be carried out by traders registered in a public register with the Executive Forest Agency and holding a certificate of registration (Article 241 of the Forestry Act).

- Is there a tax imposed on forest ownership?

In Bulgaria, the ownership of immovable property is subject to Local Taxes and Fees Act. However, under Article 10(3) of the Local Taxes and Fees Act, forests are exempt from property tax.

- What type of permits the forest owner needs to manage their land?

Several permits are required: harvest and logging permits, land-use permits, grazing permits (see Sections 4.2. and 4.3). As already mentioned above, forest activities can only be conducted by individuals and legal persons registered in the public register Executive Forest Agency, unless explicitly exempted by law.

- How is the control of forest harvest determined? Is there an obligation to mark every tree to be cut or retained?

The Executive Forest Agency and RFDs oversee harvest and logging activities, ensuring compliance with forestry laws. Illegal logging results in significant fines, confiscation of timber, and potential legal action.

Before any tree cutting can take place, a mandatory marking process must be conducted as well as harvest permit (Article 45 of the Ordinance No 8 of 5 August 2011 on forest logging). This process ensures that only selected trees are harvested. Trees designated for cutting must be marked by a licensed forester or state forest enterprises. The marking process considers forest health, growth conditions, and specific management plans. Clear-cutting, selective cutting, and thinning are regulated based on the forest type, age, and ecological value. Protected species and habitats are excluded from harvest activities to maintain biodiversity. Harvest operations must minimize soil erosion, protect water sources, and preserve wildlife habitats.

Since 2016 the electronic system for tracing of harvested timber of the Executive Forest Agency is in operation. The transportation ticket is issued by forest officer or licensed forester and has unique number. All data in the tickets is uploaded to a central server which allows easy control on all transport operations of harvested timber. The electronic ticket is valid for 12 h

and contains information about harvesting place, tree species, assortment, volume, owner, number of the harvesting permit, vehicle, end use. From 01.01.2017 the permanent timber storages were also obliged to issue electronic tickets directly connected to the electronic system of the Executive Forest Agency. Every permanent storage is obliged to install cameras on all gates to allow monitoring of the timber flow. The process of tracing the harvested timber includes also legal requirement all transport vehicles to have GPS. The control on timber transportation from felling site to temporary storage and/or from permanent storages to end consumers is executed by the RFDs at the Executive Forest Agency.

- Are there technical, administrative or economic specifications on the forest products market? Are forest harvest contracts legally defined for public or private forests or for some specific types?

To prevent illegal logging and ensure sustainable forest management, Article 213 of the Forestry Act strictly prohibits the sale, purchase, transportation, and processing of timber and certain non-timber forest products unless they meet legal requirements. The following activities are strictly forbidden:

- Trading, transporting, or processing timber that is not marked with an official forest control mark or production mark.
- Possessing or moving timber without an official transport permit (waybill).
- Importing timber without documentation proving its legal origin.
- Engaging in the commercial trade of non-timber forest products (such as Christmas trees) without a valid transport permit.

Under Article 100 of the Forestry Act, state forest enterprises are permitted to sign long-term contracts of up to 10 years for afforestation projects, ensuring sustainable forest growth. Similarly, Article 110 allows for contracts of the same duration to be signed for non-harvest thinning and pruning, which helps maintain forest health without extracting timber.

For timber harvesting and sales, Article 116 allows state forestry enterprises and municipalities to enter contracts with commercial traders for up to 15 years, regulating long-term logging activities while ensuring a steady supply of timber for the market. However, the total amount of timber allocated under such contracts is limited to a maximum of 25% of the annual timber use in a state forestry enterprise (or up to 33% for any single forestry or hunting estate) and up to 33% of the annual timber use in a municipality.

Timber use in state and municipal forests is subject to payment, as per Article 113. According to Article 112, the harvesting and sale of timber can occur in two ways: 1) Selling standing trees before they are harvested; 2) Harvesting the trees and then selling the processed timber.

Private forest owners retain full control over how they use timber on their land, but they may also contract state forestry enterprises or registered forestry companies to carry out logging operations (Article 114).

In addition to timber, Bulgaria's forests provide valuable wild forest products, such as mushrooms, forest fruits, medicinal plants, and Christmas trees. Their collection and trade are regulated to prevent overharvesting and ensure fair access.

For state-owned forests, Article 120 outlines three ways in which wild forest products can be managed: 1) Contracts for harvesting and selling wild forest products in raw or processed form ; 2) Leasing forest areas for commercial harvesting; 3) Issuing permits for the collection of wild forest products. These contracts can last up to 10 years, with clear specifications on which products may be harvested, where they can be collected, pricing, and measurement methods. For municipal forests, the same regulations apply, but decisions on wild forest products use are made by the municipal council. In private forests, owners have full discretion over how they use their wild forest products for commercial purposes (Article 114).

- Is there an obligation to prevent forest fires or other risks?

Yes. Article 128 of the Forestry Act provides that the protection of forest areas must include measures for the prevention and control of diseases, pests, fires and other abiotic impacts.

Article 130 of the Forestry Act provides that forest protection from **diseases and pests** is carried out through:

- Preventive and quarantine measures to stop the spread of diseases and pests.
- Regular monitoring and early warning systems to track the development and spread of harmful agents such as disease-causing organisms, insects, weeds, and other forest pests.
- Impact assessments and ongoing monitoring of the effects of biotic (living) and abiotic (environmental) factors on forest health.
- Control measures using biological, chemical, physical, and integrated methods to manage and eliminate threats to forest vegetation.

To determine the need for protection efforts, the health status of forests is evaluated based on forestry health forecasts. These are prepared by specialised territorial units (forest protection stations) within the Executive Forest Agency and require approval from the Agency's Executive Director (Article 131(1)).

The Executive Forest Agency, RFDs, and forest protection stations play an essential role in providing free technical guidance, consulting municipalities and forest owners, issuing recommendations, and ensuring compliance with protection regulations (Article 131(2)). All state enterprises, municipalities, educational forest research stations, and private forest owners are legally obligated to follow the recommendations of forest protection authorities for forest protection from diseases, pests and other damages (Article 131(3)).

Forest protection from diseases, pests and other damages is primarily responsibility (including financial) of forest owners or managers (Article 133(1)). However, in cases of large-scale disease outbreaks or pest infestations, control measures are organised and funded by the state through forest protection stations (Article 133(2)).

The organisation and implementation of disease and pest control in forest areas must comply with specific national regulations. These activities are governed by Ordinance No 9 of 5 December 2019 on the protection of forest areas from diseases, pests and other damages (*Наредба № 9 от 5.12.2019 г. за защита на горските територии от болести, вредители и други повреди)* issued by the Ministry of Agriculture and Food (Article 132).

Municipalities, individuals, and companies that own forests can delegate forest protection responsibilities to State Forest Enterprises or forest protection stations to ensure compliance with legal requirements (Article 134). Forest protection efforts rely on approved plant protection products, which must be registered and authorised under the Plant Protection Act (*Закон за защита на растенията*)(Article 135(1)). The application of these substances is strictly regulated and must follow guidelines issued by the Minister of Agriculture and Food, in coordination with the Minister of Environment and Water and the Minister of Health (Article 135(2)).

The planning and implementation of **fire protection measures** are mandatory for all forest areas, regardless of ownership (Article 136(1) Forestry Act). These measures include:

- Developing fire prevention strategies for each forest area, including design and implementation of fire protection plans.
- State funding for fire protection planning, ensuring that financial resources are allocated to develop preventive measures.
- Execution and maintenance of fire prevention measures by forest owners and land managers at their own expense.

The **design and implementation of fire protection plans** follow the guidelines outlined in Ordinance No 8 of 11.05.2012 on the conditions and procedures for the protection of forest areas from fires (*Наредба № 8 от 11.05.2012 г. за условията и реда за защита на горските територии от пожари).* Each year, the regional governor, based on recommendations from the RFD, issues an order designating the fire hazard season for forests within the region. This order is made publicly available through the websites of the regional administration, the RFD and the Executive Forest Agency. During the fire hazard season, strict restrictions apply, including a ban on open flames and fire-related activities within 100 meters of forest boundaries.

Owners of infrastructure and facilities that cross or are located within forests (such as roads, pipelines, and power lines) are legally required by Article 139 of the Forestry Act to:

- Maintain fire-safe conditions throughout the year.
- Regularly clear combustible materials, including dry vegetation, branches, and tree debris.
- Trim tree branches near infrastructure to reduce fire risks.
- Identify and secure high-risk fire areas.

Additionally, all individuals passing through or spending time in forests must comply with fire safety rules. This includes hunters, fishermen, and tourists, who must be informed of fire safety regulations before each outing by their respective organisations. Military units conducting exercises in forest areas are also required to ensure strict fire safety compliance and respond immediately in case of fire outbreaks.

Fire safety authorities, the Executive Forest Agency and its regional structures have the legal right to stop activities, machines, or equipment that fail to meet fire safety requirements. Take necessary action to prevent potential wildfires.

Fire prevention and control involve multiple stakeholders, as laid down in Articles 141 and 142, including: the Fire Safety and Civil Protection Authorities, the Executive Forest Agency and RFDs, State forest and hunting units, municipalities and private forest owners.

In the event of a forest fire, the Fire Safety and Civil Protection Authorities lead suppression efforts, supported by state forestry enterprises, municipal authorities, and private landowners. Municipal mayors are responsible for organising volunteer fire brigades, funded by the municipal budget, while state forestry and hunting units must establish specialized firefighting teams with trained personnel. The operational procedures for these teams are defined by the regulation referenced in Article 138(1). Additionally, anyone who witnesses a forest fire is legally required to report it immediately to emergency services by calling the European emergency number 112, as mandated by Article 143 of the Forestry Act.

To ensure forest recovery after wildfires, Bulgarian law (Article 73, Paragraph 2 of the Forestry Act) prohibits any change in the land use designation of burned forest areas for a period of 20 years. This means that land previously classified as forest territory cannot be converted into another type of land use (e.g., agricultural or construction purposes) following a fire. However, there are three exceptions to this restriction: 1) Projects related to national defense or security; 2) Investment projects approved by the Council of Ministers; 3) Municipal investment projects approved by the municipal council. These regulations prevent intentional deforestation through fire while ensuring that critical national and municipal projects can proceed if necessary.

– Is fencing or the use of forest roads regulated?

Yes. The Forestry Act (Articles 145 and 148) ensures that forest areas remain accessible to the public and wildlife, while also allowing for temporary restrictions in specific cases to protect forest resources, public safety, and economic activities. To maintain open and ecologically functional forests, landowners are prohibited from installing fences or other barriers that restrict the movement of people, wild animals, or water flows. The only exceptions to this rule are cases where restrictions are explicitly permitted by law or administrative orders (Article 145). Additionally, landowners and users of forest properties or those bordering forests cannot block access to forest roads, and any obstructions, including fencing or barriers, are strictly prohibited (Article 148(10). This regulation helps preserve the natural connectivity of forest ecosystems while ensuring that the public can freely enjoy and navigate forest areas.

When temporary access restrictions are imposed on forest areas by the Direction of the RFD[45], the responsible party must take steps to ensure the public is informed and prevented from entering the restricted zones. This includes installing warning signs or physical barriers to clearly mark the restricted area.

Legal persons or individuals who lease state or municipal forest lands for commercial activities can also request temporary access restrictions to protect their operations. These requests must be made following the same procedures outlined in Article 146 (Article 147).

[45] See question "*Are there rights to access (walking) on forest land? Are there specific regulations for public use of forest land, hiking, riding, biking, etc.?*", Section 4.3.

- Is there an obligation for forest owners and/or forest managers to be associated?

Forest owners in Bulgaria are not legally required to form associations, but the Forestry Act encourages them to do so. Article 183 of the Forestry Act establishes forest associations as unions of natural and legal persons who are owners of land plots within forest territories. These associations are established with the aim of jointly managing and administering their properties. By joining forces, forest owners can: optimize resource management and implement better forestry practices; access state and EU funding for forest conservation and development projects; improve forest protection against pests, diseases, and fires through coordinated efforts; enhance market opportunities for timber and non-timber forest products.

The Executive Forest Agency plays an active role in supporting the formation and operation of forest owners' associations in the following ways:

- Information and planning assistance – Offering data and guidance for the development of forest management plans and programs.
- Land consolidation support – Facilitating the merging of small forest plots into larger forest areas, including free property evaluations for land exchange and consolidation.
- Consultations and training – Educating association members on sustainable forest management practices
- Consultations on forest road construction
- Consultations on forest protection initiatives

While participation remains voluntary, the legal framework supports and incentivises collective forest management. However, a consulted forest association affirmed that while joint management is clearly mentioned and encouraged in the forest law, it is not applied in practice.

4.5. Forest manager/contractor obligations

- Which requirements or obligations on forest management are legally imposed on forest managers/contractors?

As mentioned above, Article 3(2) of the Forestry Act provides that the activities in forest territories must be carried out in a manner that does not cause damage to plant and animal species, their habitats, the soil, water bodies, or elements of the technical infrastructure. The management of the forest areas covers the activities of afforestation, protection against erosion and floods and felling in the forests (Article 87 of the Forestry Act). All management activities in the forests must comply with the forest management plans and legislative requirements. These plans define silvicultural methods to ensure sustainable and environmentally sound use of forest resources (Article 61 of Ordinance No 18 of 7 October 2015 on inventory and planning in forest areas).

As already mentioned, the activities in the forest areas are organised and/or carried out by natural persons and by traders who are registered in public registers with the Executive Forest Agency and hold a certificate of registration, except in cases where the law does not require

registration. The requirements to these persons are specified in Articles 233 - 236 and 241 -243 of the Forestry Act[46].

- What legal rights does the forest manager/contractor have in your country?

The rights of forest managers and forest contractors are not specifically regulated in Bulgarian legislation but are determined in the agreements concluded with the forest owners. However, these private contracts must not contradict the general framework established by the Forestry Act and other relevant legislation.

- Is there a requirement of a forest management plan? Are there detailed prescriptions on that?

There is a specific legal requirement for forest management plans and compliance is mandatory for forest managers. These plans include details for the use of the timber, afforestation and forest maintenance, fire and pest protection, biodiversity enhancement activities[47].

- Is there an obligation to register the responsibility of forest manager/contractor?
    i. Is registration based on product income?
    ii. Is there a registration fee?

No specific legislation has been identified.

- Is there a tax imposed on the forest manager? Is it based on income or hectares?

There is no specific tax imposed on the forest manager at the national level. However, the forest manager is subject to income tax on its revenues under national legislation.

5. Forest Management plans

- Are forest management plans required in the legislation of your country?
  ☒ Yes
  ☐ No
  Specify where and the conditions as well as the amount of forest land with plans

Forest management plans are required by Article 13 of the Forestry Act and Ordinance No. 18 of October 7, 2015, on Inventory and Planning in Forest Territories. They are developed for each owner, based on the type of ownership of the forest territories and the forestry units established within their boundaries.

Forestry management plans are essential for the sustainable use and management of forest territories in Bulgaria. These plans are required for all state and municipal forest territories, except for areas designated for national security and defense purposes. For the territorial divisions of state forest enterprises, the forestry management plans are developed based on

[46] See above Section 4.4 above.
[47] See Section 5 for more information.

the boundaries of forest territorial units and encompass all state-owned forest territories assigned to these enterprises for management.

Private forest territories, including those owned by individuals, legal entities, and their associations, also require forestry management plans or programs. These plans and programmes serve as a blueprint for the sustainable use of forest resources, outlining the permissible levels of resource utilisation and establishing management goals for a ten-year period. Their development relies on forestry maps, cadastral maps, maps of restored ownership, and the results of forest inventory assessments. The forestry maps used in these processes are specialised maps defined under the Cadastre and Property Register Act.

The financial responsibility for creating these forestry management plans lies with the property owners. For state-owned forest territories, the costs are covered by state forest enterprises. Once developed, the plans must be approved through official orders. The approval comes from the Executive Director of the Executive Forest Agency, while plans for other forests are authorised by the Director of the respective RFD.

The primary goal of forestry management plans is to establish silvicultural methods for forest management that align with principles of sustainable and environmentally friendly practices. These plans aim to ensure the optimal and sustainable use of forest resources within the operational area of the respective forestry unit.

To achieve this, the plans are designed based on the characteristics and condition of forest territories, their functional designation, and the economic conditions of the area. They also rely on an analysis of past management practices to determine the silvicultural guidelines for managing the forest and optimising the use of its resources. In cases where specific forest territories fall under provisions of the Forestry Act (Article 5, Paragraphs 2 and 3), specialised sections or additional analyses may be included in the plan. The plan also includes a dedicated section that outlines fire prevention activities, which is developed in conjunction with the forest inventory. Furthermore, a separate section is prepared for planned forestry activities within protected areas under the Natura 2000 network, as per Annex 16 of the applicable regulations.

At the request of the commissioning authority, the plan may also provide a valuation of the forest territories and an economic assessment of the planned activities. In addition to these components, the plan incorporates an operational project detailing activities such as logging and afforestation, as well as forestry maps illustrating the planned actions.

The planning of forestry activities involves defining key management directions, including forest regeneration and cultivation, afforestation, and natural regeneration. It also encompasses activities aimed at protecting forests from erosion and landslides, as well as measures to safeguard forest territories from diseases, pests, and other damages.

Additionally, the planning process includes determining the volume of timber and non-timber forest products to be utilised, as well as planning for the construction and maintenance of roads, buildings, and other infrastructure. Specific attention is also given to identifying the need for interventions in the border zones of power line easements and other activities required by regulatory acts or the specific terms of the planning assignment.

– Are there other type of plans required such as:

☒ Technical Plan

☐ Financial Plan

☐ Exploitation Plan

☒ Fire prevention Plan

☒ Hunting Plan

– Please indicate the minimum size of forest requiring a forest management plan?

There is no such requirement under national law, according to which forestry management plans and programs are developed for all forests, based on the type of ownership of the forest territories and the forestry units established within their boundaries. However, it seems that in practice such minimum size requirements apply pursuant to the National Forestry Accounting Plan of Bulgaria, including Forest Reference Levels for the period 2021-2025, 2020. This document states that: "*Forestry plans are prepared for all forested areas which are state and municipal property, as well as for private forested areas with land area of 50+ ha. Forestry programmes are prepared for forested areas owned by natural and legal persons with total land area of 2 – 50 ha. Private forested areas with land area under 2 ha are included in the forestry plans of state-owned forested areas".*

– On which legal basis are they required? Are they legally binding or only guidelines?

Legal basis: Article 13 of the Forestry Act and its implementing Ordinance No 18 of 7 October 2015 on inventory and planning in forest areas. The plans are legally binding and subject to control by the Executive Forest Agency. The Ordinance lays down requirements on the preparation and implementation of forest management plans and programs at local, regional, and national levels. These plans aim to balance the sustainable use of forest resources with conservation and restoration efforts. Specific measures are outlined for forest protection, biodiversity preservation, erosion control, and addressing the impacts of human activities and climate change. The ordinance also sets clear responsibilities for the entities involved in inventory and planning processes, requiring strict adherence to sustainable forest management principles. It includes detailed requirements for documentation and ensures proper oversight through monitoring mechanisms.

– Who has the responsibility for the implementation of forest management plans? Please include national, regional, and local levels as appropriate. Please distinguish between state and private ownership. Please distinguish between different protection status.

The responsibility for the implementation of forest management plans for **state-owned forests** lies with the State Forest and Hunting units, which are tasked with managing state forests (Article 165 (1), point 1 of the Forestry Act).

In other cases, the responsibility rests with the owner/manager of the forest territory. For municipal forests, this responsibility lies with the respective municipality, while for private forests, it is the responsibility of the respective owner/manager. Oversight for the development of these plans is provided by the Executive Forest Agency and the RFDs. The owner/manager of the forest territory can assign plan's implementation oversight to the

registered persons, who provide forestry practice or legal entities registered in the public register of the Executive Forest Agency under Article 241 of the Forestry Act., These persons have to be registered as providing forest activity: Inventory of forest territories and the development of plans and programs for the management and development of forest territories (Article 144 of the Ordinance No 18).

A report is prepared based on the findings from the supervision, which includes an analysis and assessment of the implementation of individual forestry activities. Specific recommendations are provided to address any identified omissions or weaknesses in the execution of the plan. If necessary, recommendations for changes to planned activities are also included. The report is submitted to the respective RFD.

- Are forest management plans being enforced?

Forest management plans are mandatory, and their implementation is monitored by the Executive Forest Agency and its regional divisions. These plans serve as a blueprint for the sustainable use of forest resources, outlining the permissible levels of resource utilisation and establishing management goals for a ten-year period. Non-compliance results in penalties, including fines (as per Article 257 (1), point 2 of the Forestry Act) and temporary suspension of activities (as per Article 253 (3), point 1 of the Forestry Act).

In terms of the practical implementation, according to the Analysis of the State of the Forestry Sector in the Republic of Bulgaria (2013–2021) (page 56), as of December 31, 2021, all state forest units and state hunting units conducted their forestry activities based on active forestry management plans. Approximately 90% of forest territories under municipal ownership had developed forestry management plans, while 30–40% of forest territories owned by private individuals, legal entities, and religious organisations had forestry management plans or programs in place.

- Is there an obligation to maintain a Forest Book (linked or related to the Farm Book of the Common Agricultural Policy (CAP)?

There is no obligation under the Bulgarian law to maintain a Forest Book.

- How often do forest management plans need to be updated? Who is responsible for the update?

Article 13(4) of the Forestry Act states that forest management plans are developed for a ten-year period. This means they must be updated at least every ten years. The responsibility for the update of forest management plans for state-owned forests lies with the State forest and hunting units, which are tasked with managing state forests (Article 165 (1), point 1 of the Forestry Act). In other cases, the responsibility rests with the owners or persons responsible for managing the respective forest territory (Article 92 of Ordinance No 18).

Article 92 of Ordinance No. 18 provides that amendments to an approved forest management plan during its 10 years of validity period are allowed at the request of forest owners or persons responsible for managing the respective forest territory under the following conditions:

- When changes to the planned activities are necessary.

- When an extraordinary inventory, as outlined in Article 3, Paragraph 3, has been commissioned.
- When a new forestry unit is established.
- When significant changes occur in the applicable legislation related to activity planning.

- Are specific mechanisms put in place to guarantee that national legislation is in line with European guidelines and criteria on forest management plans (i.e. Natura 2000 Forest Management Plans?

As per Article 9 of the Forestry Act, forest planning is conducted at three levels and includes: a National strategy for the development of the forestry sector and a strategic plan for the development of the forestry sector; regional plans for the development of forest territories and forest management plans and programs.

While the Forestry Act (Articles 10(4), points 2 and 3, and 12(8)) requires the National Strategy to reflect the legislation, priorities, and specific objectives of the European Union, and mandates that the Strategic plan and regional plans be aligned with it, no such requirement is envisaged for forest management plans. Nonetheless, since forest management plans must align with both the National Strategy and strategic and regional plans, it can be implied that they are also in line with EU guidelines.

Forestry Act and Ordinance No 18 provide that the representatives from the scientific community, non-governmental environmental organisations, and industry associations participate in the development and public consultation process of the National Strategy for the Development of the Forestry Sector. Public consultation is mandatory for all levels of forestry planning- national, regional and forestry management plans.

Article 61 of Ordinance No. 18 states that **the main purpose** of forest management plans is to determine the forestry methods for forest management in accordance with the principles of nature-friendly management, ensuring optimal and sustainable use of forest resources within the respective forestry unit's area of activity.

- Are there any specific requirements for the forest management plans in terms of content, structure or criteria? If yes, please elaborate.

Forest management plans are regulated under Ordinance No 18 of 7 October 2015 on inventory and planning in forest areas. Their primary purpose is to set guidelines for sustainable forest management and optimise forest resource use based on territorial characteristics, economic conditions, and past management practices.
Each plan includes:

- Sections for protected forest areas, fire protection activities, and forestry measures within Natura 2000.
- Optional assessments of forest value and economic evaluation of planned activities if required.
- Detailed designs for logging, afforestation, and forestry maps (Article 62 of Ordinance No 18).

The plan is assigned by the forest owner or manager to certified individuals registered under Article 235 of the Forestry Act. The Executive Forest Agency approves plans for state-owned forests, while RFDs handle other cases. If necessary, field assessments are conducted to analyse regeneration potential, wood stock, and infrastructure conditions (Article 71 of Ordinance No 18).

Sustainable forestry planning must balance resource use, regeneration, biodiversity conservation, erosion control, and fire protection. Special considerations apply for Natura 2000 habitats, aligning forestry activities with conservation status assessments. Timber extraction is prohibited in designated old-age forest phases, except in cases of significant natural disturbances affecting more than 30% of an area (Article 75 of Ordinance No 18).

Forest owners/managers must provide documentation (e.g., past forestry plans, ownership records) for planning purposes. Within one month of fieldwork, a meeting is held to refine terms of reference, address emerging issues, and define third-party responsibilities. Public discussions are mandatory, with draft plans published online and accessible for review.

Draft plans, including timber use proposals, undergo review by expert councils (for state-owned forests) or technical councils (for other forests). A commission conducts field inspections and reviews public feedback, prescribing necessary corrections. Final approval is granted by the Executive Forest Agency (for state-owned forests) or RFD Director (for others) - Articles 86, 91 of Ordinance No 18.

The Executive Forest Agency and RFDs oversee all stages of plan development, ensuring compliance through inspections and protocols. Costs for required modifications fall on either the person, who developed the plan (if due to non-compliance) or the owner/manager (if due to additional requirements).

- Are there any supporting mechanism for the management plans? If yes, please elaborate.

Article 13 (7) of the Forestry Act provides that the development of forest management plans and programs is funded by their owners, and for forest territories that are state-owned, by the State Forest Enterprises. The Executive Forest Agency provides support by provision of information and consultations of the forest owners. No specific financial mechanisms for the management plans has been identified.

- Are there impact assessment required in your country in relation to the adoption of the forest management plans? What mechanisms are in place in your country to ensure that forest management plans are developed to ensure sustainable forest management practices? If yes, please elaborate.

Yes. Forest management plans and programmes must be assessed for compatibility with the conservation priorities of relevant protected areas, as required by Article 13(12) of the Forestry Act and the Biodiversity Act. This applies when no regional forest plan has been approved for the area.

Under Article 89 of Ordinance No. 18 (2015), the assignor of the forest management plan must submit all necessary documentation to the Ministry of Environment and Water for a decision under Article 31 of the Biodiversity Act. This assessment evaluates the impact of activities,

projects, or plans on protected sites within the National Ecological Network, including Natura 2000, ensuring they do not harm biodiversity or conservation efforts. The notion of 'plans', as defined in para.1, point 31b of the Additional provisions of the Biodiversity Act, includes regional plans for the development of forest territories, forest management plans and programs, and other projects not covered under Annexes No. 1 and 2 of the Environmental Protection Act, except those required under the Spatial Development Act. As forest management plans are explicitly mentioned, they are subject to this compatibility assessment.

Article 32 of the Biodiversity Act explicitly provides that the competent authority may approve a plan, program, project, or investment proposal only if an assessment concludes that it will not cause significant damage to the conservation objectives of the protected area[48]. This requirement also applies when assessments are conducted through an environmental assessment or environmental impact assessment as per the Environmental Protection Act, ensuring consistency in conservation protection across assessment types. The procedures for the compatibility assessment are set out in the Biodiversity Act and its implementing Ordinance[49].

A preliminary assessment determines whether a proposed activity could significantly impact a protected area. If risks are identified, a full compatibility assessment follows, including biodiversity studies and mitigation measures. The Ministry of Environment and Water or the relevant regional inspectorate then decides whether the project can proceed, requires modifications, or should be halted. Public participation is key, ensuring stakeholders, conservation experts, and local communities have input. Additionally, Article 30(1) of the Biodiversity Act mandates that spatial and forest development plans incorporate measures to maintain ecological connectivity, supporting species movement across fragmented habitats.

Besides that, Article 55 (4) and (5) of the Forestry Act specifically requires for regional forest plans that the contracting authority submits the approved assignment to the competent authorities under the Environmental Protection Act and the Biodiversity Act for a determination regarding the need to conduct an environmental assessment and an assessment of compatibility with the objectives of Natura 2000. If it is determined that an environmental assessment and/or compatibility assessment is required, the contracting authority commissions the preparation of the environmental assessment and/or compatibility assessment simultaneously with the procedure for selecting a contractor to develop the regional plan for the development of forest territories.

– Are the Natura 2000 sites plans already implemented and well-coordinated or integrated with forest management plans? Are traditional forest activities recognized in those plans? Are there guidelines for small forest owners and managers on what they can and can't do?

Yes. Natura 2000 sites and forest management plans are well-coordinated, with an emphasis on integrating biodiversity conservation with traditional forest management. Traditional forest

[48] Under the national law, the level of potential damage is evaluated by comparing the area of the impacted habitats with their total area within the specific protected area and across the entire network of protected areas.

[49] Ordinance on conditions and procedures for assessment of the compatibility of plans, programmes, projects and investment proposals with the subject and the purpose of protection in protected areas(*Наредба за условията и реда за извършване на оценка за съвместимостта на планове, програми, проекти и инвестиционни предложения с предмета и целите на опазване на защитените зони*).

activities are recognised and incorporated within Natura 2000 plans. Article 61(5) of Ordinance No. 18 requires a separate section within the forest management plan to be developed specifically for planned forestry activities within Natura 2000 protected areas. Additionally, Article 75(4) stipulates that the planning of forestry activities for identified types of forest habitats must be carried out in accordance with the system of regimes, measures, and standards for the sustainable management of forestry units within Natura 2000. These plans are aligned with the results of the assessment of their favorable conservation status. Forestry activities within protected areas designated under the Biodiversity Act must comply with their specific management regimes and measures, as outlined in Article 75(7) of Ordinance No. 18. Furthermore, the planning of forestry activities in protected territories and areas under Article 3 of the Biodiversity Act must adhere to relevant laws, orders for their proclamation, and their respective management plans. In cases where the conservation status of forest habitats is assessed as unfavorable, planning efforts must be directed toward achieving a favorable conservation status, as required by Article 75(9) of Ordinance No. 18.

There are guidelines in place to help forest owners and managers align their activities with the conservation objectives of Natura 2000[50]. Additionally, mechanisms like compensations are possible for those impacted by restrictions due to conservation needs.

6. Sustainable forest management.

6.1. Sustainable forest management definition and forestry practices

– Is sustainable forest **management (SFM) defined in your country**?

☐ Yes
☒ **No** (there is not a specific definition, but there is a SFM approach and the National Forest Strategy mentions the Helsinki definition)

The law itself does not define the SFM notion; however, its provisions are aimed at management and use of forests in a way that maintains their biodiversity, productivity, regenerative capacity, and ecological, social, and economic functions. Article 1 (1) of the Forestry Act states: *This law regulates public relations concerning the protection, management, and use of forest territories in the Republic of Bulgaria to ensure the multifunctional and sustainable management of forest ecosystems.*

This is further elaborated in the National Strategy for the Development of the Forest Sector in the Republic of Bulgaria until 2030, which provides: *"Using forests in a way and intensity that maintains their biodiversity, productivity, vitality, regeneration and restoration capacity, and their potential to fulfil now and in the future the relevant ecological, economic, and social functions in harmony with other ecosystems. Forest management in Bulgaria is based on the understanding of sustainable development, which represents a tested and dynamic concept, striving for a balance*

[50] Regimes for Sustainable Forest Management in Natura 2000 - *Режими за устойчиво управление на горите в НАТУРА 2000* – 2011, The study was prepared by a joint team of researchers from the University of Forestry, the Forest Research Institute of the Bulgarian Academy of Sciences, and experts from the Executive Forest Agency.

between all these aspects and functions amidst continuously changing ecological, economic, and social conditions".

In Annex 4 of the National Strategy the Helsinki definition is mentioned "*Sustainable Forest Management: The stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfill, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems* (source: Ministerial Conference for Protection of Forests in Europe, Helsinki, 1993)".

- Does the definition of SFM include specific objectives?

  ☐ Yes
  ☒ **No**

Given that a definition does exist, there are not specific objectives set. However, the National Strategy for the Development of the Forest Sector in the Republic of Bulgaria until 2030 and the Strategic Plan for the Development of the Forestry Sector 2014–2023, which refer to the main objectives of the Forestry Act (Article 2(2), include specific objectives which are related to a SFM approach (*see below*).

- Does your country have specific guidelines on Sustainable Forest Management? If yes, are those mentioned in the legislation?

  ☐ Yes, they can be found here:
  ☒ **No**
  ☐ Other sources defining or implementing Sustainable Forest Management

There are no country specific guidelines, but in Annex 1 to the National Strategy for the Development of the Forest Sector in the Republic of Bulgaria until 2030, within Criteria A.3 "Legal/regulatory frameworks and international obligation", there are more in depth information about SFM in Bulgaria.

Also, the NGO Green Balkans have developed several handbooks and other materials for sustainable forest management within the NATURA 2000 sites in Bulgaria.

- Does your country have a Forest Strategy and/or Forest Management Policy setting policy priorities that implement a SFM approach?

  ☒ **Yes**, they can be found here: Article 2 (2) of the Forestry Act and the National Strategy for the Development of the Forest Sector in the Republic of Bulgaria until 2030 (which refers to the law). As noted above, the Strategy hasn't been adopted yet.
  ☐ No
  ☐ Other sources setting the Forest strategy/policy

The National Strategy provides the following:

"The objectives laid out in the Forestry Act of 2011, preceding the goal-setting in the National Strategy for Sustainable Development of the Republic of Bulgaria for the period 2013-2020, are aligned with heightened criteria for sustainable forest management. These objectives include: 1) conservation and expansion of forest areas; 2) maintenance and improvement of forest conditions; 3) guaranteeing and maintaining the ecosystem, social, and economic functions of forest territories; 4) ensuring and increasing timber and non-timber forest product production through sustainable forest management; 5) maintaining biological and landscape diversity and improving the status of populations of wild flora, fauna, and fungi species; 6) providing opportunities for recreation for the population and improving recreational conditions; 7) achieving a balance between the interests of society and forest landowners; 8) supporting and encouraging landowners in forest territories; 9) fulfilling international and European commitments for the conservation of forest habitats."

Within its strategic goals, the following is mentioned

"*Strategic goal 1: Implementation of a targeted policy for promoting sustainable forest management as a primary means of ensuring the ecological function of forest habitats, preserving and enhancing biodiversity, and contributing to mitigating climate change. Priorities:*

- *Increasing the area of forests and their resources;*
- *Improving forest management;*
- *Increasing the effectiveness of control, restoration and information activities related to the prevention and fight against forest fires in forest areas;*
- *Increasing the effectiveness of prevention and the results of the fight against abiotic and biotic damage in forest areas;*
- *Conservation and restoration of biodiversity in Bulgarian forests;*
- *Maintaining and increasing the area of certified forest areas;*
- *Maintenance and development of the system for conservation and restoration of genetic forest resources;*
- *Introduction of compensatory instruments and mechanisms, including under the Strategic Plan for Rural Development for the period 2023-2027, in order to provide opportunities for owners and managers of forest areas to declare their forests (based on the relevant criteria) as forests in the old age phase in order to reach at least 10% of the forest types of natural habitats in Natura 2000;*
- *Introduction of the paid use of ecosystem services provided by forest areas".*

– Which requirements/obligations result from the legally binding requirement for SFM?

1. For forest owners

– Compliance with forest management plans.
– Protection of forest resources and biodiversity.
– Reforestation after logging.
– Compliance with requirements for the conservation of protected species.

2. For forest managers

   - Compliance with forest management plans.
   - Implementation of sustainable management practices.

- Are specific criteria and/or indicators to determine whether SFM is being achieved? Where are they described (see table below)?

National Strategy for the Development of the Forest Sector in the Republic of Bulgaria until 2030, page 20, states that the balance between the total average annual growth and the average annual use of timber is one of the most important indicators for assessing sustainable forest management. During the period 2005–2010–2020, the average annual growth increased from 14.1 million cubic meters to 14.4 million cubic meters of timber in 2010, then began to decline to 13.6 million cubic meters by the end of 2020.

On top of the above, Strategic Goal 1 of the National Strategy is relevant for SFM (see above). However, no specific criteria or indicators have been established to determine whether SFM is achieved through that goal and its priorities, given the lack of an updated strategic plan for the period of the 2030 National Strategy (the last one ended its validity period in 2023).

- Are some **forest managers implementing sustainable forest management practices voluntarily**? If yes, how are these voluntary management practices taking place? Through citizen initiatives, local initiatives, or other ways? Please explain how forest managers ensure that forest management practices are sustainable.

Voluntary certification systems, such as FSC and PEFC, are envisaged in the Forestry Act (Articles 20 and 21) and are implemented by forest managers. Forest certification in Bulgaria serves as a voluntary yet crucial mechanism for ensuring that forest management meets high environmental, economic, and social standards. It provides a structured approach to assessing and validating forestry practices through a set of defined standards, helping to promote sustainable forest use while maintaining transparency and accountability. The certification process is conducted by independent, non-governmental organisations, ensuring impartiality and credibility. Once a forest manager successfully meets the required standards, they receive an official certificate, which verifies that the forest is being managed responsibly, balancing ecological conservation, economic benefits, and social interests.

According to the information provided in Annex I to the National Strategy: Analysis of the State of the Forestry Sector in the Republic of Bulgaria (2013–2021) (page 169) Bulgaria has made significant progress in forest certification, with a large portion of its forests meeting sustainable management standards. The country's certified forest areas are primarily accredited under the FSC (Forest Stewardship Council) certification system, which ensures responsible forest management.

According to official information from FSC[51], as of February 21, 2024, the area of FSC-certified forest territories is 2,356,416.86 hectares, which accounts for 60% of the total forest

[51] https://fsc.org

area in the country. The number of certified units is 30 (Table 3). Additionally, 406 certified units hold an FSC Chain of Custody certification for timber traceability.

The area of FSC-certified state-owned forest territories managed by state enterprises under Article 163 of the Forestry Act is 2,336,868.86 hectares, representing 81% of the total area managed by these enterprises. The number of certified units within these forests is 28[52].

Since 2017, Bulgaria has approved and implemented the National FSC Standard (FSC-STD-BGR-01-2016 V-1) for responsible forest management. This standard sets requirements covering social, economic, and environmental aspects, ensuring the protection of biodiversity and the environment in certified forests.

Additionally, Bulgaria also has national certification under the **PEFC** system. This standard is fully based on the criteria and indicators for SFM adopted under the Pan-European "FORESTS OF EUROPE" process. According to the electronic information portal of the Program for the Endorsement of Forest Certification (PEFC), as of February 21, 2024:

- 90 certified units hold a PEFC Chain of Custody certification for timber traceability.
- 19 certified units hold a PEFC Forest Management certification.

- Which mechanisms are put in place to support the implementation of SFM? Which measures are in place to monitor implementation of the SFM?

Several subsidies can support the implementation of SFM: Rural Development Programmes 2014-2020 (Measure 8), Natura 2000 funding activities, Strategic Plan for the Development of Agriculture and Rural Areas 2023-2027, Fund "Forest investments" (for the State Forest Enterprises)[53].

Monitoring on the implementation of the SFM is entrusted to the Executive Forest Agency and RFDs. Apart from imposition of sanctions under Chapter Eighteen of the Forestry Act, the Directors of the RFDs have the authority to suspend illegal forestry and construction activities in forest areas. This includes: unapproved or non-compliant forestry activities and construction projects; violations of environmental protection laws; operations that damage, pollute, or improperly process timber.

[52] Source: 2023 Annual report of the Executive Forest Agency, page.20

[53] The state forestry enterprise maintains two funds: Forest Investment Fund – for targeted forestry investments and Reserve Fund – for financial stability. These funds support the enterprise's legal obligations and sustainable forest management. The Forest Investment Fund is financed by revenue from timber and non-timber product sales from state forests. It is used for afforestation, forest land acquisition, infrastructure development, erosion control, and EU-funded projects. Additionally, it supports the construction of game food storage facilities when undertaken by state forestry enterprises – Articles 178, 179 of the Forestry Act.

- Which forest management practices are required or prohibited by law in your forest/country? Please check below the proposed forest management practices and add supplementary ones if missing (Please include explanation of the legal requirements of the relevant techniques).
    - Closer to nature silviculture practices
    - Clear-cutting – *Article 104 of the Forestry Act (prohibition of clear-cutting), Article 32 of Ordinance No 8 of August 5, 2011 on logging in forests (cases, where clear-cutting is allowed)*
    - Shelterwood system – *Article 102 of the Forestry Act (regeneration logging)*[54]
    - Selective logging – *Article 6 (2), point 3 of Ordinance No 8 of August 5, 2011 on logging in forests*
    - Afforestation and reforestation to enlarge forest areas - *Article 89 of the Forestry Act*
    - Controlled burn - *Article 23 (1), point 3 (clearing of logging sites and reforestation areas outside the fire hazard season) of Ordinance No 8 of May 11, 2012, on the conditions and procedures for the protection of forest areas from fires*
    - Mandatory salvage logging – *Article 34 of Ordinance No 8 of August 5, 2011 on logging in forests (Sanitary logging is conducted when forests suffer damage due to biotic factors, such as pest infestations, fungal infections, or disease outbreaks)*
    - Other .....

- Are there limitations on the management models to be applied, like clearcuttings or their sizes? Is there a ban on clear cutting linked to SFM?

The Forestry Law and its Ordinances establish limitations to harvest and perform clear-cutting, and is only permitted under specific conditions to ensure forest regeneration and environmental protection – (see above under Section 4.3). These limitations, however, are not directly linked to SFM, as in Bulgaria currently there are no legally binding requirements for SFM.

[54] Regeneration logging is carried out when forest stands reach a minimum age threshold, ensuring a sustainable cycle of forest renewal. According to Article 102 of the Forestry Act, the required minimum age for regeneration felling varies depending on the forest type:

- High-stem forests (except for birch, willow, poplar, and artificially planted stands outside their natural habitat) must be at least 80 years old before logging.
- Coppice forests undergoing conversion to seed-based forests require a minimum age of 50 years before harvesting.
- Short-rotation forests, such as black locust (Robinia pseudoacacia) forests, may be logged at 15 years, while other low-stem forests require a minimum age of 20 years before felling.

- Is there a defined/legal target for forest land to be managed for conservation and species protection objectives in your country or region?

☒ Yes 10 % with a national scope in National Strategy for Biodiversity *(Стратегия за биологичното разнообразие в Република България)*

☐ Yes .....% with a regional scope in:

☐ Yes but no target for a % at national level

☐ Yes but no target for a % at regional level

☐ No

According to the National Strategy for biodiversity, the country aligns with the EU Biodiversity Strategy through two main goal "Ensuring the conservation, preservation, and development of the network of protected areas and biosphere reserves" and "Preserving and enhancing the role of forests in biodiversity conservation and mitigating climate change by increasing their area, quality, and sustainability". As per targets, the National Strategy aims to ensure protection, under an effective management regime, of at least 30% of terrestrial areas (proportionally to forests) and 30% of marine areas, while integrating ecological corridors within a functioning trans-European nature protection network and to provide strict protection for at least 10% of forests (10% of all forests, not only those within the Natura 2000 network), including the protection of all remaining primary forests (forests in the old-growth phase).

- Are there forest owner obligations related to forest restoration after harvest?

Yes. To ensure forest regeneration and ecosystem recovery, the Forestry Act mandates reforestation for areas affected by logging or wildfires under specific conditions: if a clear-cut or burned area fails to regenerate naturally within three years, the landowner is required to reforest the area within the following two years (Article 97(1)); if the forest management plan or logging plan specifies artificial regeneration, reforestation must be completed within three years after tree felling (Article 97(2)).

6.2. "Closer-to-nature" guidelines and practices

(This section relates to the Commission Guidelines on Closer to nature forest management but also Commission guidance on payment schemes for forest ecosystem services both aiming to provide information and guidance for sustainable forest management)

- Has your country incorporated the newly published Commission guidelines in their legal or regulatory framework?

No.

- Has your country recognized under law/regulatory measure a closer-to-nature approach in forest management? If yes please provide the source where this is explained and elaborate below.

☐ Yes: in the Strategy that can be found here: .....

☒ No

- Does your country have legislation/measures setting specific biodiversity targets/management objectives for sustainable forest management at a national or regional level?

  ☐ Yes, at national level – they can be found here:
  ☐ Yes, at regional level – they can be found here: .....
  ☒ No

  Please describe them and elaborate:

The 11th national goal of the Strategy for biodiversity, called "Preserving and enhancing the role of forests in biodiversity conservation and mitigating climate change by increasing their area, quality, and sustainability", includes the following provision: *Implementation of silvicultural systems aimed at creating forests with structures close to natural, sustainable conditions*. Apart from that, and the targets of the National Biodiversity strategy mentioned above, there is no mention of closer-to-nature practices or specific biodiversity targets/management objective for SFM in official documents in Bulgaria.

6.3. Climate change and Forest carbon absorption

- Does your country have legislation/measures setting specific climate change targets or objectives for sustainable forest management at a national or regional level?

Bulgaria has implemented strategies aimed at addressing climate change and promoting sustainable forest management, yet these strategies do not define specific, measurable objectives.

National Strategy for the Development of the Forest Sector until 2030 refers to one of the key documents guiding forest management - the National Climate Change Adaptation Strategy until 2030, along with its Action Plan, adopted by Council of Ministers Decision No. 621 on October 25, 2019. The strategy provides a comprehensive analysis of climate risks and vulnerabilities, with a particular focus on the forest sector.

The strategy highlights that forest ecosystems are of crucial importance to Bulgaria, given their high biodiversity and productivity. Despite significant efforts to prepare forests for climate change adaptation, the document identifies several key vulnerabilities:

- uncertainty regarding species' responses to changing climate conditions.
- large areas of artificial plantations established outside their natural range, particularly at low altitudes, which increases the risk of reduced growth and health issues.
- higher likelihood of major forest fires and natural disturbances, such as windthrow, wet snow damage, ice accumulation, insect infestations, and fungal pathogens.
- potentially improved conditions for invasive tree species, which could significantly damage forest resources.
- predominant use of timber for low-value products with short life cycles, limiting the long-term economic benefits of forestry.

To address these challenges, the strategy sets out three main goals: enhancing knowledge and research to improve climate adaptation, improving and protecting forest resources to ensure

their resilience, and increasing the potential for sustainable forest resource utilization. The corresponding action plan includes strengthening research, education, and knowledge-sharing capacity; conducting scientific studies to support adaptation; managing forest renewal processes sustainably by expanding forest areas and timber stock; preserving biodiversity and genetic diversity; improving overall forest resource management; promoting the long-term use of high-value wood products; and encouraging the sustainable and eco-friendly use of wood biomass for energy production.

To be considered that by 2030, Bulgaria's forests are expected to increase in area and timber stock, improving their overall condition. These forests will play a vital role in supporting a prosperous, modern, and climate-neutral economy, while preserving biodiversity, mitigating climate change impacts, and providing essential ecosystem services such as clean air, water, and soil preservation. Additionally, they will contribute to the socio-economic development of all regions and communities in the country. In line with the above, the National Strategy for the Development of the Forest Sector in the Republic of Bulgaria until 2030 aims to align Bulgaria's forest policies with the European Union's strategic documents on forests, climate, and biodiversity. Through a transparent and inclusive approach, it seeks to establish sustainable forest management as the primary means of balancing the ecological, social, and economic functions of forests.

Regional forest management plans must align with the National Strategy, ensuring coordinated and region-specific approaches to sustainable forestry[55].

[55] To be noted that Measure 15 "Ecological Services and Climate-Related Services in Forestry and Forest Conservation" under the Rural Development Program (RDP) 2014-2020 was not launched.

7. Forest land market

NOTE: The key objective is to identify and present information on the basic legal framework regulating market of forest land and inheritance processes.

- Are there specific legal requirements or limitations when selling and buying forest land?

The legal requirements set in the Forestry Act differ, depending on the type of ownership.

The Bulgarian government follows a structured process to acquire privately owned forest lands, aiming to expand state-owned forests, particularly in protected areas. The acquisition of forest territories by the state is based on a decision by the Council of Ministers. This decision authorises the Ministry of Agriculture and Food to initiate the purchase procedure and finalise contracts for land acquisition (Article 32(1) of the Forestry Act). Priority is given to forest territories bordering existing state-owned forests, especially those located in protected areas or designated special-use forests (Article 32(2) of the Forestry Act). Once the Council of Ministers approves the acquisition, the Ministry of Agriculture and Food issues a public announcement. The announcement is published in one national and one regional newspaper and on the Executive Forest Agency's website at least two months before the deadline for submitting offers (Article 32(3) of the Forestry Act). Private landowners wishing to sell their forest land through this structured process must submit a written proposal to the Executive Director of the Forest Agency, including the offered price (Article 32(5) of the Forestry Act). On the designated date, the Executive Director of the Forest Agency appoints a commission to review submitted offers. The commission evaluates the proposals and decides which properties should be acquired and which should be declined. A protocol of the proceedings is drafted, including recommendations on accepted and rejected offers. The protocol, recommendations, and draft contracts are forwarded to the Ministry of Agriculture and Food. Based on this report, the Ministry signs the purchase agreements with the selected landowners (Article 32(7) of the Forestry Act).

The state can sell state-owned forest land under specific conditions, ensuring that sales are regulated, transparent, and aligned with national development and conservation policies. The state may sell privately owned state forest territories only in two cases: 1) To settle co-ownership disputes where the state shares ownership of forest land with other parties; 2) When a legally approved spatial development plan designates the forest land for urban expansion or new construction zones (Article 33(1) of the Forestry Act). Sales of state-owned forest land require a public auction, initiated by a ministerial order (Article 34(1 of the Forestry Act)). If the initial auction price exceeds BGN 500,000 (approximately €250,000), the sale must first be approved by the Council of Ministers (Article 34(2) of the Forestry Act). Public announcements for auctions must be published in one national and one regional newspaper, as well as on the official websites of the Ministry of Agriculture and Food and the Executive Forest Agency (Article 34(3) of the Forestry Act). All proceeds from forest land sales go directly into the budget of the Executive Forest Agency. These funds can only be used for purchasing new forest or agricultural lands and for afforestation efforts (Article 34(6) of the Forestry Act).

Forest land within the Natura 2000 ecological network cannot be sold, even if included in an urban development plan (Article 33(3) of the Forestry Act).

Forest land designated for urban expansion can only be sold after the approval of a detailed development plan, and the Ministry of Agriculture and Food is responsible for updating the cadastre records (Aticle 33(4)(5) of the Forestry Act). In cases of co-ownership, the state can sell its share without an auction, provided the co-owners accept the offer as per the Property Act (Article 33(6) of the Forestry Act). If the co-owners are a legally established forest association, the sale can occur without an auction, based on the association's governing body's approval (Article 33(7) of the Forestry Act).

The disposition of municipal forest lands must follow the procedures set by the **Municipal Property Act** *(Закон за общинската собственост)* (Article 40(1) of the Forestry Act). Publicly owned municipal lands (including forests) cannot be transferred to third parties, except when transferred to the state under specific legal conditions (Article 7(2) of the Municipal Property Act). Privately owned municipal property (as opposed to public municipal land) may be sold, transferred, or otherwise disposed of (Article 7(3)). Paid acquisitions of property or rights must be approved by the municipal council and executed by the mayor, following specific regulations (Article 34(2)).

Public municipal property cannot be sold or transferred unless explicitly permitted by law (Article 34(6) of the Municipal Property Act). Private municipal property can be sold following legal requirements and municipal council approval (Article 34(4) of the Municipal Property Act).

Contracts related to property acquisition, transfers, or exchanges must be executed in writing by the mayor and officially registered with the relevant property registry (Article 34(7)-(8) of the Municipal Property Act).

Municipal properties classified as private assets can only be sold following a municipal council decision and through a public auction or open competition (Article 35(1) of the Municipal Property Act).

Certain transactions can occur without an auction, such as: sales between the municipality and the state or between different municipalities; sales to specific entities legally entitled to acquire the property (Article 35(4)); donations of municipal property require a three-fourths majority of municipal council votes (Article 35(5)).

Once a public auction, competition, or council decision is finalised, the mayor issues an official order and signs the contract (Article 35(6) of the Municipal Property Act).

For forest land that is neither state nor municipal property, transactions (such as sales or transfers) must be completed in notarial form (Article 40(2) of the Forestry Act).

The national law (Article 79(7) of the Forestry Act) does not permit the sale of land properties in forest areas that have undergone a change in designation if they are located within Zone "A", Zone "B", or in urbanized areas of settlements beyond the boundaries of Zone "A", as defined by the Law on the Spatial Development of the Black Sea Coast. Additionally, the sale is prohibited

if the land contains sand dunes, as determined by the Ministry of Environment and Water or an authorized official.

It is worth to be mentioned that under Article 23 of the Forestry Act, political entities and foreign states cannot own forest territories in Bulgaria. EU/EEA citizens and companies can acquire forest land after Bulgaria's EU accession conditions are met. Non-EU/EEA nationals and legal entities can own forest territories only under a ratified international treaty or through inheritance.

According to a consulted forest association, the market for private forests in the country remains very limited. Owing to highly fragmented ownership structures, transactions are often of little practical or economic value. In the case of forest associations and cooperatives, transaction costs frequently exceed the actual value of the property concerned.

- Are there limitations to divide the land by selling or inheritances?

No.

- Are there institutions/bodies providing information related to the forest land market?

There are no dedicated bodies providing information related to the forest land market in Bulgaria.

- Are there institutions/bodies contributing to dynamize that market, like forest land banks or advisory bodies (similar to the CAP advisory bodies) and others? Is there regular information on the amount of forest land transferred and the prices of transmissions? (Information on this market is usually missing)

In Bulgaria, there are no specialised "forest land banks"; however, state enterprises implement initiatives to purchase private forests with the aim of ensuring sustainable forest management.

Article 5 (1) of the Ordinance on the appraisal of land properties in forest area[56] requires the Executive Forest Agency to establish a database containing information on transactions involving land properties in forest territories, categorised by settlements. Information is published only for 2015 and 2016; 2017; 2018; 2019; 2020; 2021 and 2022; 2023.

Besides this information, there is no other information database for the forest market prices and transactions.

[56] This Ordinance, regulates the conditions and procedures for determining the following: 1. prices for transactions with land properties in forest territories - state and municipal property; 2. prices of detached trees in forest territories and outside them; 3. prices for establishing the right to build on land properties in forest territories - state and municipal property; 4. prices for establishing the right of use and easements on the plots properties in forest areas; 5. prices for change of the purpose of land properties in forest territories; 6. prices of land properties in forest territories, for which normative act or a public authority requires an assessment and no other conditions are specified in law and order for preparation of the assessment; 7. values of compensations in case of expropriation of land properties on forest territories; 8. values of damages caused to land properties in forest territories; 9. insurance and mortgage value of land properties in forestry territories; 10. starting prices for conducting auctions for renting land in forestry territories - state property; 11. prices for consolidation of land properties in forest areas.

- Are there regulations of forest land leasing? Are they common with agricultural land or independent and with specific requirements?

Yes. The rules governing forest lands are specific and regulated by the Forestry Act, whereas agricultural lands fall under the general provisions of the Agricultural Land Act. The land leasing is regulated for state and municipal forests. Private owners can freely lease their land.

Leasing and Renting State and Municipal Forest Land (Articles 41–43a)

- State and municipal forest lands can be leased temporarily under rental (short-term) or lease (long-term) agreements (Article 41(1)).
- Leasing cannot alter the land's function, interfere with other activities, or cause soil degradation (Article 41(2)).
- Subleasing is strictly prohibited (Article 41(3)).
- Forest lands leased must only be used for their designated purposes (Article 42).

Rental Terms and Conditions

- State forest lands are rented through a public auction, managed by the director of the relevant State Forest Enterprise (Article 43(2)).
- Municipal forest lands require municipal council approval, and rental contracts are signed by the mayor (Article 43(3)).
- Certain exceptions allow renting without an auction, such as:
    - Non-profit organisations for public benefit activities.
    - Short-term rentals (under one year).
    - Temporary structures needed for long-term contracts.
    - Sanitary and storage facilities for aquaculture, up to one decare in area (Article 43(3)(4)).
- Maximum rental duration: 10 years (Article 43(5)).
- For pasture, meadow, or grassland use, leases must be at least 5 years (Article 43a).

Non-forest lands managed by the Executive Forest Agency or State Forest Enterprises can be rented through the Ministry of Agriculture and Food, following state property regulations. RFDs must be notified when a rental contract exceeds three years (Article 45). Timber extraction cannot be included in a rental agreement (Article 46).

Forest land leases (*аренда*) are allowed when they involve a permanent change in land use (Article 47(1)). Lease agreements can include existing infrastructure, such as buildings, machinery, and equipment (Article 47(2)). State forest leases require a public auction, managed by the director of the State Forest Enterprise (Article 47(3)). Municipal forest leases are auctioned under the municipal council's authority, with contracts signed by the mayor (Article 47(6)).

Lease contracts cannot exceed 30 years (Article 47(7)). Lease revenues are directed to the State Forest Enterprise or the municipality (Article 47(8)). Lessees are responsible for maintenance of buildings, roads, drainage, and irrigation systems (Article 50(1)).

Insurance is mandatory for buildings, machines, and forestry-related equipment included in the lease (Article 50(2)). Harvested resources from leased land belong to the lessee, except for timber and non-wood forest products, unless they are part of the lessee's activities (Article 48).

Municipal councils regulate rental and lease agreements for municipal forest lands through local ordinances.

- Are there obligations and or access to insurances for forest land or forest activities?

Insurance is mandatory for buildings, machines, and forestry-related equipment included in the lease (Article 50(2) of the Forestry Act). Owners can insure their forests against fires, natural disasters and pests. Insurance is voluntary.

- Are there specific regulations providing, facilitating or limiting access to financial credits for forest activities or mortgages on forest land?

No. Banking institutions provide loans and mortgages under the general procedure, and the assessment and conditions depend on the economic value of the property. Under Article 166 (4) of the Forestry Act, State Forest Enterprises are prohibited from mortgaging or pledging forest lands assigned to them for management.

8. Forest companies, Forest incentives and taxation.

Forest Companies

- Is there a register of forest industries? Is there a register of forest contractors?

Yes. Forestry Act (Articles 214–224) establishes a framework for branch organisations within the forestry and wood processing industries. Companies and individuals engaged in forestry activities can form industry organisations based on two main branches:

- "Forestry Management" – covering forest inventory, timber extraction, and management planning (Article 214(1)).
- "Wood Processing and Furniture Industry" – covering primary and secondary wood processing (Article 214(1)).

These organisations are non-profit entities, operating in either public or private interest (Article 214(2)). They must comply with the law, their internal statutes, and decisions of their governing bodies (Article 214(3)). Their name must clearly indicate their industry focus, avoiding misleading or inappropriate wording (Article 214(5)). Membership in a forestry industry organisation is voluntary, but only registered forestry companies can join (Articles 215–216).

National forestry industry organisations provide information to the Ministry of Agriculture and Food and the Executive Forest Agency on sector activities (Article 221(1)). They assist the government and local authorities in implementing forestry policies and rural development initiatives (Article 221(2)). Government agencies collaborate with these organisations, providing necessary information for their functions (Article 221(3)).

The state or municipalities may delegate administrative and technical services to national industry organisations through a Council of Ministers or Municipal Council decision (Article 222(1)). Responsibilities and conditions for these services must be clearly outlined in official decisions (Article 222(2)). Government oversight ensures compliance, with the right to revoke delegated tasks in case of violations (Article 222(3)).

Only national industry organisations can officially represent forestry businesses before the government and the Ministry of Agriculture and Food (Article 223(1)). Each national organisation appoints a permanent representative to liaise with the Ministry of Agriculture and Food and consult with experts when needed (Article 223(2)).

The Ministry of Agriculture and Food maintains an official register of all forestry industry organisations (Article 224).

Mandatory registration for forest activities: In Bulgaria, forestry activities can only be organised or carried out by individuals or legal persons that are officially registered in the public registries of the Executive Forest Agency (before engaging in forestry activities) and hold a valid registration certificate (issued by the Executive Director of the Executive Forest Agency). This means that forest management activities such as forest inventory, timber harvesting, and the preparation of forest management and development plans can only be carried out by registered persons/entities (Article 241 of the Forestry Act).

The public register includes:

- Private forestry companies registered for commercial forestry activities.
- State forestry and hunting units.
- Municipal forestry enterprises.
- Forestry research and training institutions.
- Specialised units of the Executive Forest Agency, when performing forestry activities independently (as per Article 165(4) & (5)).

However, registration is not mandatory for companies engaged exclusively in drafting regional forest development plans.

- Is there any specific regulation on forest ownership, forest cooperatives or other types of forest companies or are they all regulated under the Company Law?

Forest companies, like other businesses in Bulgaria, must adhere to the general framework set out in the Commercial Law, which governs the formation, operation, and management of companies. This includes regulations on corporate governance, financial reporting, and legal responsibilities. Forestry cooperatives are managed by a chairman, a management board and a supervisory board for a term of four years. They are elected by a general meeting of owners from among the owners.

State Forest Enterprises have a unique legal status, as defined by Article 163 of the Forestry Act. This special status allows them to manage state-owned forest territories, ensuring their sustainable use, protection, and development. The legal framework grants these enterprises specific rights and responsibilities, distinguishing them from private forestry businesses and municipal forest entities. Their main role is to implement national forestry policies, oversee timber harvesting, and conserve forest resources, while operating under strict government supervision.

- Do small forest owners have access to the status of forest companies?

Small forest owners can create forest companies. They can also unite in associations.

Forest incentives and taxation

There are no specific incentives for Bulgarian forest owners and managers to implement SFM.

- Are there effective subsidies for forest owners and managers to implement SFM? And/or to carry out biodiversity conservation measures? If it does exist, please compare the total amount paid at national level in the last 3 years with available information with the amount defined as necessary at the Prioritised Actions Framework.

Even though there are no specific subsidies directed to implement SFM, some indirectly implement a SFM approach. The main tool would be the European Agricultural Fund for Rural Development (EAFRD), through the Common Agricultural Policy (CAP).

Strategic Plan for the Development of Agriculture and Rural Areas 2023-2027 will finance through the funds taken from the EAFRD the following measures:

- II.A.13 - Forest Ecological Activities – Preservation, designation, and expansion of old-growth forests; protection of nesting habitats for diurnal and nocturnal birds of prey and the black stork; permanent marking and conservation of at least 10 biotope trees per hectare, including trees with cavities and nests serving as refuges for rare and protected species; establishment of protective/buffer strips of at least 20 meters width without commercial use; maintenance of standing and lying deadwood at a minimum of 15% of the stand's volume; exclusion of forest areas with slopes greater than 35° from commercial use; extending the regeneration period of regeneration felling by one age class or transforming stands into "continuous-cover forests."
- II.A.14 - Natura 2000 Support for Forests – This measure aims to compensate forest owners and managers for lost income resulting from conservation restrictions imposed within Natura 2000 sites.
- II.A.15 - Maintenance of Newly Created and Restored Forests – Provides annual per-hectare payments to support the maintenance of newly established or restored forests.
- II.G.10 - Afforestation and Restoration – Includes afforestation of agricultural and non-agricultural lands, recovery of forests damaged by wildfires, natural disasters, and catastrophic events, as well as the restoration of protective forest belts.
- II.G.11 - Prevention of Forest Damage from Wildfires, Natural Disasters, and Catastrophic Events – Funds activities related to the creation, improvement, and maintenance of fire prevention infrastructure and other preventive measures against forest fires, as well as the restoration of affected forests.
- II.G.12 - Improving the Health and Resilience of Forest Ecosystems – Supports activities such as thinning operations to enhance the health and stability of forest territories.

According to the Rural Development Programme (RDP) 2014-2020, Measure 8 includes support for five sub-measures, four of which are implemented: Sub-measure 8.1: "Afforestation and Maintenance"; Sub-measure 8.3: "Prevention of Forest Damage from Wildfires, Natural Disasters, and Catastrophic Events"; Sub-measure 8.4: "Restoration of Forest Damage from Wildfires, Natural Disasters, and Catastrophic Events"; Sub-measure 8.6: "Investments in Forestry Technologies and in the Processing, Mobilization, and Trade of Forest Products".

National funding is provided for fire and pests protection.

– What taxes are applicable to Forest companies and forest owners?

The taxes for forest enterprises are corporate tax (10% as per the Corporate Income Tax Act) and for forest owners income tax (10%).

Under Article 10(3) of the Local Taxes and Fees Act (*Закон за местните данъци и такси*) forests are exempt from property tax.

9. Enforcement: Forest control and penalties.

- Are there specific measures in place to enforce compliance with the legal requirements on forest management?

  Please list only the legislative measures including the responsible body that are specific to forest management requirements.

Bulgaria has well-defined legislative measures for monitoring and controlling forestry activities. The Executive Forestry Agency serves as the primary regulatory authority, supported by RFDs, municipalities, and other specialised institutions. To ensure sustainable forest management and conservation, violations of forestry laws are addressed through administrative fines, confiscation of illegally harvested timber and equipment, criminal liability for severe offenses.

As of 2023, the enforcement of forestry legislation is carried out by 325 forest inspectors (employers of the Executive Forest Agency). However, the number of inspectors has been steadily decreasing over the years, raising concerns about the effectiveness of direct field control over forestry activities.

The Forestry Act is the primary law governing the management, protection, and control of forest territories in Bulgaria. The sanctions for the violations of its provisions are laid down in Chapter 18 of the Forestry Act.

The Executive Forest Agency is the main regulatory body responsible for forest management and enforcement. On a regional level these functions are caried out by the RFDs. It conducts inspections to ensure compliance with forestry laws. Municipalities oversee municipal forest management and ensure compliance with local forestry regulations. Ministry of Environment and Water monitors forestry activities in protected areas and Natura 2000 zones. Police and Prosecutor's Office investigate and prosecute serious offenses like illegal logging and forest destruction.

Article 274 of the Forestry Act outlines the authorities responsible for establishing violations of the Forestry Act and its related regulations. Violations are established by:

- Officials from the Executive Forest Agency and its regional structures who hold forestry-related qualifications.
- Employees of State Forestry Enterprises, state forest units, state hunting unitss, and educational-experimental forest enterprises with forestry qualifications.
- Mayors, deputy mayors, and municipal forestry officials responsible for municipal forest territories.
- Registered forestry practitioners who have contracts for forestry activities.
- State officials from the Ministry of Agriculture and Food, authorized by the Ministry.
- State officials from the Ministry of Interior, authorized by the Ministry.

Additionally, specific officials (e.g., those from State Forestry Enterprises) have the authority to stop and inspect vehicles transporting timber and forest products and check related

documents; use special-purpose vehicles designated by the Ministry of Agriculture and Food and inspect documentation for logging, grazing, and other forest-related activities.

Article 275 of the Forestry Act defines the procedures for issuing penalty decrees for violations: municipal mayors issue penalties for violations detected by municipal forestry officials; authorized officials from Regional Forestry Directorates issue penalties in other cases; authorized officials from the Ministry of Interior issue penalties for violations identified in their competences.

Articles 256–270 of the Forestry Act define administrative violations and their respective penalties related to forestry activities in Bulgaria.

General obstruction and non-compliance (Articles 256–257)

- Obstructing officials in performing forestry-related duties: Fine of 50 to 300[57] BGN for individuals and 100 to 500 BGN for companies.
- Failure to fulfill forestry duties (e.g., improper approvals, lack of supervision, or document violations) by forestry professionals: Fine of 300 to 5000 BGN.

Illegal forestry practices (Articles 258–260)

- Performing forestry activities without the required qualifications: 100 to 300 BGN fine (or 200 to 400 BGN for repeat offenses).
- Conducting unauthorized forestry assessments: 500 to 5000 BGN fine.
- Practicing forestry without proper registration: 300 to 1000 BGN fine (higher for repeat offenses).

Failure to cooperate with authorities (Articles 261–262)

- Failure to comply with orders, provide access, or submit required documents: 50 to 500 BGN fine (higher penalties for damage to public property).
- Companies violating registration requirements or obstructing inspections: 200 to 5000 BGN fine.

Environmental and infrastructure violations (Articles 263–264)

- Damaging forest roads, dumping waste, or removing topsoil: 200 to 2000 BGN fine, along with mandatory restoration.
- Blocking access to forest roads or preventing necessary repairs: 100 to 2000 BGN fine.

Land use violations (Articles 265–266)

- Illegal land-use change in forests: 1000 to 5000 BGN fine for individuals and 3000 to 15,000 BGN for companies.

[57] 1 EUR=1,95583 BGN

- Unauthorized logging, transport, or trade of forest products: 500 to 5000 BGN fine for individuals, and 2000 to 20,000 BGN for companies (higher for repeat offenses).

Fraudulent practices (Articles 267–268)

- Failure to report lost or stolen forestry control marks: 50 to 500 BGN fine.
- Forgery or misuse of official forestry identification: 1000 to 10,000 BGN fine.

Liability of employers and additional violations (Articles 269–270)

- Employers responsible for forestry violations: 200 to 2000 BGN fine.
- Other general violations not specified elsewhere: 50 to 500 BGN fine for individuals, and 100 to 1000 BGN for companies.

In addition, the national law envisages imposition of administrative measures such as: Illegally harvested timber and non-timber products, vehicles, and equipment may be seized (Article 273 of the Forestry Act); temporary shutdown of violators' activities (Article 253 of the Forestry Act).

Illegal logging and forest destruction are considered as criminal offence under the Criminal Code (*Наказателен кодекс*) (Articles 235 and 236 of the Criminal Code).

Article 235 criminalizes illegal logging and related offenses. Anyone who cuts, collects, transports, or processes trees from forest lands without a valid written permit, or outside the specified terms and locations, faces up to six years of imprisonment and a fine ranging from 1,000 to 20,000 BGN. The same penalties apply to those who conceal, transport, store, or process illegally harvested timber.

For more severe cases, such as organised crime involvement, the use of falsified documents, repeat offenses, or large-scale illegal logging, the punishment increases to one to eight years of imprisonment and a fine between 5,000 and 15,000 BGN. If committed as part of an organised criminal group or by a repeat offender, penalties rise to three to ten years of imprisonment and a fine between 10,000 and 100,000 BGN. In cases of extreme severity, involving particularly large-scale illegal logging, offenders may face five to fifteen years of imprisonment and a fine between 50,000 and 500,000 BGN.

For minor offenses, the penalty may be up to one year of imprisonment, probation, or a fine between 100 and 300 BGN. Confiscation of illegally harvested timber or its equivalent value is mandated in all cases.

Article 236 imposes penalties for damaging or destroying forest trees, saplings, young growth, or forest nurseries. Offenders may face up to two years of imprisonment, probation, and a fine between 100 and 300 BGN. In particularly severe cases, the penalty increases to up to five years of imprisonment.

10. Conclusions

10.1. Legal or regulatory barriers for SFM

- What are the main legal and regulatory barriers and enablers affecting the implementation of SFM in your country?

BARRIERS.

The sustainable management of land and forests in Bulgaria is regulated by numerous laws and regulations, which are often fragmented and outdated. A consulted forest association affirmed that the forest framework is too voluminous and contradictory. According to the same association, since the vast majority of forests are state-owned, forest legislation and policies are geared towards the state sector and enjoy priority.

Financial incentives for small forest owners are insufficient to achieve meaningful impact, and no state budget funds are allocated to support their forest management activities. To be considered also that the process of applying for subsidies can be administratively burdensome, limiting access to available support.

Additionally, the penalties for violations under the law are too low to serve as an effective deterrent.

A consulted forest association affirmed that the fact that forest plans must be prepared by individuals may be problematic in some cases. For owners of small forest holdings (up to 2 hectares), this requirement is often considered burdensome and costly. As a result, many of these forests remain unmanaged, with associated economic and environmental consequences. Efforts should therefore focus on simplifying procedures for small forest owners and providing incentives to encourage active forest management.

ENABLERS.

A positive aspect of regulations and practice is the assistance provided to small forest owners by the Executive Forest Agency, as well as the state funding for certain activities, such as fire protection plans, the development of forest management maps, and pest protection measures.

A significant portion of Bulgaria's forests are FSC-certified, ensuring adherence to sustainable management principles. The presence of PEFC certification also aligns with EU sustainability goals. Promoting these schemes could encourage more small forest owners to participate in SFM.

Bulgaria's National Strategy for Forest Development until 2030 and other policy frameworks aim to improve forest management, including afforestation, biodiversity conservation, and resilience to climate change.

- Are there specific legal and regulatory barriers or challenges to implement a closer-to-nature approach in forest management in your country?

The "closer-to-nature" approach has not been integrated into national legislation or the strategic framework, which makes its practical implementation challenging.

- What are the main legal drivers for implementing a closer-to-nature approach in forest management for relevant actors?

While closer-to-nature forest management is not yet explicitly implemented in Bulgaria, several legal and policy frameworks create a foundation for its potential future adoption. The National Biodiversity Strategy already promotes silvicultural systems that aim to develop forests with structures close to natural conditions, aligning with the principles of closer-to-nature forestry. Additionally, the integration of forest management within Natura 2000 conservation requirements, as mandated by the Biodiversity Act, supports selective logging and natural regeneration, which are key elements of this approach. The Forestry Act and the National Strategy for the Development of the Forest Sector until 2030 define sustainable forest management in a way that leaves room for closer-to-nature principles to be incorporated into national policies. Bulgaria's strong engagement with FSC and PEFC certification schemes, which promote biodiversity-friendly management, further suggests that closer-to-nature practices could gain traction. Moreover, the National Climate Change Adaptation Strategy acknowledges the risks of artificial plantations and climate-induced disturbances, highlighting the need for more resilient forestry practices. Given Bulgaria's alignment with EU forestry and biodiversity policies, future financial incentives and legal requirements could facilitate the gradual adoption of closer-to-nature forest management.

10.2. Legal or regulatory gaps in national forest legislation

Please provide key conclusions based on the information referred to in previous sections.

Based on the information gathered for this report and the COST Action FP1201 FACESMAP Country Report (p.7) and the Analysis of the State of the Forest Sector in the Republic of Bulgaria for the Period 2013–2021, several key challenges and gaps in forest management have been identified:

- The Strategic Plan accompanying the National Strategy for the Development of the Forest Sector in Bulgaria until 2030 has not been adopted. This absence results in a lack of clear indicators and criteria to measure progress toward achieving the strategy's objectives.
- Complex subsidy application procedures, particularly for small forest owners, making access to financial support difficult.
- No clear adaptive measures for forest ecosystems are defined in legislation.
- Private forests are often small and fragmented, leading to low profitability and insufficient economic incentives for sustainable management.
- Increased regulatory requirements for sustainable forest management create additional burdens for private owners.
- Poor road infrastructure limits access and efficiency in forest management activities.
- Lack of state support to encourage the formation of private forest owner associations and joint management forests, which could facilitate sustainable management.
- No national policy has been formulated for private forest owners between 2013-2021.

- No comprehensive assessment of the state of private forests within the context of sustainable management has been conducted.
- The National Plan for Non-State Forestry Development has not been prepared as intended.
- Only 3 Regional forest development plans have been developed (out of 28).
- No integrated, publicly accessible national electronic information system for forests and the forestry sector has been established.
- National forest inventory has not been initiated, leaving data gaps for effective decision-making.
- Legal provisions to promote private forest ownership and optimize public-private partnerships in the forestry sector have not been enacted.
- EU Rural Development Program (2014-2020) forestry measures were not fully implemented, limiting financial support for forest conservation and sustainable management.
- Financial support mechanisms need to be reassessed and improved in the next programming period to enhance their effectiveness for forestry activities.

National experts on forest legislation and references

- Please provide the names and contacts of 3 to 5 experts in forest legislation in your country,

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- Provide key books or articles analysing the national and/or regional forest legislation in your country, particularly if they compare it with other countries, if they analyse the effect in actual management of SFM.
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