

FACSIMILE TRANSMISSION

**United Nations Development Programme**
GLOBAL ENVIRONMENT FACILITY (GEF)**To:** Ms. Song Li
GEF**Date:** 9 September 1998**Fax:** 202-522-3240**Pages:** (10 including this sheet)**From:** Eduardo Fuentes
Principal Technical Adviser
Biodiversity**Subject:** Revised Biodiversity Enabling Activity proposal for Bulgaria

We have revised the biodiversity proposal for Bulgaria in light of your comments received on Sept. 2. Your comments have been addressed as follows;

The proposal reflects the relevant work carried out in Bulgaria in the two years since the proposal was first submitted. A comprehensive listing all biodiversity conservation projects is not feasible under the scope of this project. However, relevant projects (National Report, USAID project, biosafety working group) have been cited in 'Coverage without Duplication' and/or the 'Activity Matrix'. Additional references have been made to the Bulgarian-Swiss Biodiversity Conservation Project and EU-PHARE funded activities. Funds are not being requested to carry out any activities already covered.

References to updating of the biodiversity strategy prepared in 1994 have been removed. During the NBDCS process, objectives for sustainable use and benefit sharing were not developed (2 of 3 CBD objectives). Therefore objectives for these aspects will be set as part of action plan preparation.

The Ministry of Environment and Waters has requested us to expedite approval of the project as soon as possible since they are committed to preparing a draft of the BAP by end 1998. We would appreciate your expedited approval of the project.

Thank you for your usual cooperation.

**GLOBAL ENVIRONMENT FACILITY
ENABLING ACTIVITY PROPOSAL**

Country:	Bulgaria
Project Title:	Biodiversity Action Plan
GEF Focal Area:	Biodiversity
Country Eligibility:	Convention Ratified, 29 February 1996,
GEF Financing:	US\$ 154,706
GEF Implementing Agency:	UNDP
National Executing Agency:	Ministry of Environment and Waters (MEW)
GEF Operational Focal Point:	MEW, Mr. Neno Dimov
CHM Focal Point:	MEW, Ms. Anna Krijan
CBD Focal Point:	Ministry of Environment and Waters
Duration of Project:	6 months

BACKGROUND

1. Bulgaria ranks among the most biologically diverse countries in Europe. It supports 94 species of mammals, 383 birds, 36 reptiles, 16 amphibians, approximately 27,000 invertebrate species, 3,550 vascular plants and more than 6,500 non-vascular plants and fungi. More than 300 Balkan, and 260 Bulgarian vascular species and subspecies representing about 7% of the total number are endemic to Bulgaria.
2. Bulgaria has a number of unique and representative communities and ecosystems that are highly valuable in terms of biological diversity, including alpine and sub-alpine coniferous forests, meadows, wetlands, peat bogs, and lakes; mature coniferous and beech forests; oak woodlands; caves and mountain gorges; Mediterranean and sub-Mediterranean plant communities; steppe grasslands; riparian and coastal wetlands; sand dunes, coastal limestone communities and other unique habitats along the Black Sea coast, littoral, sub-littoral and benthic communities of the Black Sea itself
3. Bulgaria's biological diversity faces a broad array of anthropogenic threats. Pollution of Bulgaria's air, soil, groundwater, freshwater, and coastal waters have intensified over the last five decades and constitutes a significant threat to both biological diversity and human health. Illegal gathering and export of medicinal plants and other economically valuable species especially edible fungi, reptiles and amphibians affects many ecosystems, habitats and taxa. Over-fishing of commercial fish species in the Black Sea as well as poaching and sport hunting of large mammals and birds is causing populations of many species to decline.
4. The conservation of biodiversity and the protection and use of natural resources is managed and controlled by several government bodies. The Ministry of the Environment and Waters (MEW) is responsible for developing and implementing policy for environmental and water protection and use. MEW designates and controls activities in protected natural sites and has responsibility for co-ordinating the functions of other ministries related to environment and water. Within the MEW, the National Nature Protection Service (NNPS) is a specialized department for the management, control and conservation of biodiversity, protected areas and natural ecosystems.
5. The Ministry of Agriculture, Forests, and Agrarian Reform (MAFAR) is responsible for developing and implementing policy with respect to agriculture, forestry hunting and fisheries. The National Forestry Department in the MAFAR manages the use, restoration and protection of protected areas

under the general governance and control of MEW. However, the responsibilities and channels of cooperation between the two ministries are poorly defined and unclear.

6. Changes in the legal and policy regime as a result of the recent political reform in Bulgaria may have far reaching consequences for biodiversity. A case in point is the (recently approved) Law of Restitution of Forests which will return a large percentage of forestland to private owners and municipalities. In the absence of a strong regulatory and monitoring mechanism the consequences for the biodiversity on these lands could be devastating. Changes in laws therefore need to be analyzed for impacts on biodiversity. It is also vital that policy makers and legislators in other sectors are aware of these effects and integrate biodiversity concerns into their policy formulation.
7. In 1994 Bulgaria prepared its National Biological Diversity Conservation Strategy (NBDCS) with the support of 75 Bulgarian scientists, government officials, and NGOs representatives under the WWF/TNC/WRI/USAID Biodiversity Support Programme. As part of the NBDCS process, experts prepared reports summarizing the current information on taxonomic groups. These reports present known numbers and distributions of key genera and species, discuss threats and propose recommendations for action to conserve species. The reports were discussed in a national workshop on the basis of which, the NBDCS was prepared and subsequently endorsed by the Council of Ministers. However the implementation of the NBDCS recommendations has lagged due to a number of reasons;
 - The NBDCS was prepared considering only biological criteria without taking an ecosystem approach and considering policy, social, economic, legal and institutional aspects;
 - Insufficient participation of the parties directly concerned by the implementation of the recommendations;
 - Action plans were not developed, implementors were not identified and responsibility for action was not allocated;
 - Root causes of biodiversity loss and resource use patterns were not explored in depth;
 - Strategies are targeted towards only one of the objectives of the CBD, "the conservation of biodiversity", its sustainable use and sharing of benefits have not been considered. This has resulted in a lack of ownership/support and an impression of high opportunity costs of conserving biodiversity.
8. The Council of Ministers has therefore, directed MEW to develop a detailed Biodiversity Action Plan (BAP) in consultation with sectoral ministries by Jan 1, 1999. As part of the BAP process a broad consultative process will be undertaken to develop detailed action plans to achieve the objectives of the CBD. The BAP will be developed for implementation over a five-year period under the framework set down by the Pan-European Strategy Biological and Landscape Diversity Strategy.

Project Objectives and Brief Description:

9. The primary objective of this project is to develop a National Biodiversity Action Plan, agreed to by stakeholders and co-ordinated by the MEW. The BAP will introduce a co-ordinating and unifying framework to strengthen and give direction to existing and future initiatives and programmes of the different national authorities. The BAP will present an innovative and proactive approach towards the biological diversity in Bulgaria - addressing biological and landscape diversity values in one approach and integrating ecological consideration into all social and economic sectors. Under the BAP process, the main economic sector ministries concerned with biodiversity use will develop sectoral action plans for the conservation, sustainable use of biodiversity and the sharing of its benefits.

10. The BAP will use the framework of the Pan-European Biological and Landscape Diversity Strategy (PEBLDS) adopted at the Sofia'95 Environmental Conference. The following themes of the Strategic Action Plan 1996-2000 of PEBLDS will be addressed;

- *Coastal and marine ecosystems;*
- *Inland waters and wetland ecosystems;*
- *Grassland ecosystems;*
- *Forest ecosystems;*
- *Mountain Ecosystems;*
- *Agro-ecosystems.*

Preparation of the AP will follow a logical sequence of steps as follows:

11. MEW will establish a steering committee consisting of deputy ministers from the following government ministries; Agriculture/Forests and Agrarian Reform; Industry; Transport; Triad and Tourism; Regional Development and Planning; Education and Awareness; Environment and Waters and selected NGOs. The Minister of MEW will chair the intersectoral planning team. In the long term, the members of the intersectoral planning team will serve as biodiversity focal points in their respective organizations and be responsible for catalyzing the implementation of the BAP.
12. MEW will appoint a National Project Director¹ to oversee the project and report to the intersectoral planning team. A full time project coordinator will handle day to day project co-ordination and management. 6 working groups corresponding to the PEBLDS themes will be set up comprised of leading experts from academia, government agencies, NGOs. Each working group will carry out specific studies and analyses, working in cooperation with national consultants.
13. The intersectoral planning team, working group members and other relevant stakeholders will meet at a 1-day project initiation workshop. Participants will be advised of CBD obligations, biodiversity planning approaches and processes followed in other countries. Workshop participants will agree upon the objectives for the BAP and the vision for biodiversity in the country. Detailed project methodology and workplan will be developed and approved, concrete guidance will be given to the working groups. A framework for the assessment of information will be decided and socio-economic and biological criteria for identifying and prioritizing options will be discussed and adopted. An international consultant will assist with organizing and facilitating this workshop and familiarize the working groups and national consultants with biodiversity planning and analysis techniques.
14. Each Working Group will then organize and synthesize information according to the six ecosystem themes. This exercise will build upon the information collected for NBDCS which is remarkably complete but limited to biological data systematized according to taxonomic groups. To support development of sectoral action plans this information needs to be analyzed and organized according to the ecosystem themes. The main gaps in information are legal/policy, institutional, economic issues, resource use/accrual of benefits and threats. Therefore each working group will gather data on these issues. Guidance will be given to each working group by national consultants. A separate assessment of these issues at a national level and of international treaties (TRIPS, GATT, EU directives, etc.) will be carried out. Each working group will work with experts from the economic sectors to identify and analyzed the influence of each economic sector on each ecosystem.

¹ It is anticipated that the head of the National Nature Protection Service be appointed the NPD.

15. Working group reports and recommendations will be presented at a first national workshop, which will bring together decision-makers and experts from sectoral ministries, national NGOs and institutions. Participants will discuss the results of the assessment and the gaps identified. Activities by each sector will be discussed and prioritized and goals for each sectoral ministry will be developed. An international consultant with conflict resolution skills will facilitate the workshop.
16. Following the first national workshop, experts from the relevant Government institutions/ministries will analyze the goals for its sector and develop action plans to incorporate these into its plans and programs. Consultations will be held among experts and policy makers within Government ministries and departments to decide upon actions, set targets and indicators to measure progress, decide upon a timeframe for action, identify stakeholders and resources needed.
17. Sectoral action plans will be presented and discussed at a second national workshop bringing together representatives from the ministries, working groups and NGOs and institutions. The goals, targets and actions proposed in each sectoral action plan will be analyzed to ensure that approaches across sectors are complementary and to agree upon joint mechanisms for action. The Project Coordinator, NPD and experts from Government institutions/ministries will then compile the results of the second workshop into a draft BAP. The draft BAP will present national goals for biodiversity conservation, sustainable use and sharing of benefits and lay out action programs by sector to achieve these goals.
18. The draft BAP will then be disseminated nationally for a public discussion phase, it will be made available to national ministries, agencies, NGOs, municipalities, unions, guilds, and parliamentary commissions. Written comments will be invited to be submitted and a public discussion will be held at the MEW to discuss the comments received. Following this phase the BAP will be finalized by the project team and submitted to the Council of Ministers for review and adoption. Upon adoption, the BAP will be published and disseminated nationally and internationally.

Coverage without duplication

19. NBDCS: The NBDCS was prepared in 1994 primarily with the help of 75 Bulgarian scientists and experts. The NBDCS is primarily an assessment of Bulgaria's biodiversity and presents data in reports summarizing the status of taxonomic groups, known distributions, population sizes of key species and recommendations to conserve them.
20. The biological data presented in the NBDCS is extremely comprehensive and new data does not need to be gathered. However to develop sectoral action plans, the biological data needs to be re-organized spatially in relation to the 6 ecosystems identified. Data on social, economic, legal/policy, institutional, capacity, indigenous knowledge issues needs to be gathered and root causes also need to be analyzed and identified in relation to the scope, spatial location and specific ecosystem.
21. Each working group will prepare reports summarizing available biological, socio-economic information and threats to its respective ecosystem. Activities and the impact of each economic sector on each ecosystem will be identified and analyzed. During the BAP process, goals for biodiversity conservation, sustainable use and benefit sharing will be agreed to by stakeholders and action plans to attain these objectives will be developed.

22. A primary objective of the BAP process is to involve a wide range of stakeholders/implementers in setting goals for biodiversity conservation, sustainable use, benefit sharing and deciding how best to go about achieving these goals. This broad based process of consultation and planning is yet to be carried out in Bulgaria.
23. *Bulgaria/USAID GEF Biodiversity Project*: USAID and the Bulgarian Ministry of Environment and Waters have jointly developed the Bulgaria/USAID GEF Biodiversity Project which aims to;
- strengthen the National Nature Protection Service of the Ministry of Environment;
 - develop and apply legal and financial instruments for the protection of biodiversity;
 - develop management plans and demonstrate interagency collaboration in plan implementation for the Central Balkan and Rila National Parks; and
 - Provide equipment for the management of the Central Balkan and Rila National Parks.
24. The BAP process will collaborate closely with the USAID GEF project. In particular, data gathered on legal and financial instruments will be used as appropriate.
25. *Biosafety*: A biosafety working group has recently been set up to develop a national biosafety strategy. The working group consists of directors from institutes dealing with genetic resources. The working groups are currently in the process of assessing risks from living modified organisms and analyzing national capacity. Enabling Activity funds will not be used for biosafety strategy development, however, the BAP process will be co-ordinated with the work of the biosafety working group.
26. *The Bulgarian-Swiss Biodiversity Conservation Programme* is developing management plans for a number of wetlands along the Black Sea coast. Management plan activities will be reviewed in relation to the development of sectoral action plans for the conservation of wetlands.
27. A national Programme for Biological Monitoring is being funded by *EU-Phare*, and carried out by the MEW. The BAP process will provide input into the development of biodiversity indicators and criteria as indicators for sustainable development.

Best Practice

28. The BAP will be drafted by national experts, present national priorities and be consistent with the country's cultural, historical, and geographic setting. Methodology will be consistent with the WRI/IUCN/UNEP "Guidelines for Preparing National Biodiversity Strategies and Action Plans". The prioritization of issues concerning landscape, ecosystems and species for 1998-2002 period will be based on the PEBLDS action themes, which are complementary to the CBD.

Time Plan

29. The project will start in September 1998 and last for 6 months.

Activity/Month	1	2	3	4	5	6
Establishment of intersectoral planning team and 6 working groups. Project initiation workshop	X					
Assessment/analysis of information by working groups development of recommendations.	X	X				

National workshop; consolidation of assessment, analysis of recommendations to develop strategies.			X			
Development of action plans by each sectoral ministry, consolidation into a draft BAP.			X	X		
National workshop to discuss the draft BAP, public dissemination.				X		
Finalization of BAP, submission to council of ministers				X		
National dissemination					X	X

30. Project Financing ²

Activities	Product (US\$)	Process (US\$)	Total (US \$)
<i>Stocktaking and Inventory of Existing information³</i>	8,500		8,500
National consultants	7,500		
Documentation, translation, misc.	1 000		
<i>Identification and Analysis of Options</i>	6,500	60,000	66,500
National consultants	6,500	15,000	
International consultants		15,000	
Project initiation workshop and first national workshop		30,000	
<i>Preparation of Action Plan</i>	5,000	60,000	65,000
National consultants	5,000	10,000	
International consultants		15,000	
Second National workshop		15,000	
Public dissemination and discussion		5,000	
Translation, dissemination, misc.		15,000	
<i>CHM Add-on⁴</i>	10,200		10,200
<i>Co-ordination and Management Costs (3%)</i>	906	3,600	4,506
TOTAL	31,106	123,600	154,706

31. MEW contribution to the Action Plan process is estimated at US\$ 20, 000. These contributions are "in kind" including staff time, provision of facilities and materials, oversight of the BAP, logistical support from the NNPS and organization of workshops.

Deviation From Criteria And Norms:

32. The project fully complies with the GEF operation criteria for enabling activities in biodiversity.

² Funds for preparation of a National Report are not being requested since Bulgaria has already prepared one with its own resources.

³ Detailed biological data has already been gathered under the NBDACS. Limited funds are being requested to prepare reports and analyses for discussion during the national workshops and consider social, economic, policy, legal issues.

⁴ A detailed CHM budget is presented in Annex 1.

Institutional Framework And Project Implementation:

33. The MEW will appoint and supervise a National Project Co-ordinator to manage the 6 working groups as a multidisciplinary team. Each working group will comprise of scientists and experts supported by national consultants. Overall guidance and monitoring of the project will be provided by the Steering Committee with broad based representation from different ministries. Members of the Steering Committee will continue as biodiversity focal points in their respective ministries after the completion of this BAP. The Project Co-ordinator will organize the various project workshops and take responsibility for preparation of the BAP. International consultants will be recruited for short assignments to provide familiarization with biodiversity planning approaches and approaches followed in other countries, facilitate workshops and provide expertise in different issues as appropriate.

Table A Activity Matrix

Enabling Activity	Output	Capacity Building		Public Partic.	Comments
		Inst. St.	Training		
<i>Stocktaking and Assessment (scientific and social), based on Existing Information</i>					
biodiversity and biological resources, including those under threat	NBDCS				1
affected communities including indigenous and local communities	X				
cross-sectoral issues including agrobiodiversity	X/NBDCS				2
policy and regulatory framework and incentives	X/NBDCS/USAID				3
institutional and human capacity existing and needed for biosafety; initial assessment/monitoring including taxonomy, agrobiodiversity, access to genetic resources and indigenous and local communities	X/USAID/Biosafety group				4
analysis of root causes of biodiversity loss	X/NBDCS				5
technologies for conservation and sustainable use, including biosafety activities with adverse impacts	X/biosafety				6
measures for access to genetic resources	X/NBDCS				
existing programs	X/USAID				7
preliminary statement of objectives and identification of gaps	X/NBDCS				8
- assessment of existing needs	X/NBDCS				9
<i>Identification and Analysis of Options to Meet the Objectives of the CBD</i>					
strategies for conservation	NBDCS		X	X	
strategies for sustainable use	X		X	X	
- strategies for benefit sharing	X/USAID		X	X	10
<i>Planning and Preparation of a Strategy and Plan</i>					
national strategy	X/NBDCS		X	X	
- national action plan	X		X	X	
<i>Preparation of the first National Report</i>					
- first national report	MEW				11
<i>Capacity building for participation in the Clearing-house Mechanism (CHM)</i>	X				

Footnotes To the Activity Matrix

1. Biological information gathered for the NBDCS will primarily be used during the BAP process. This information will be re-organized according to the 6 ecosystem themes identified.
2. A joint Bulgarian-Swiss project has gathered information on agricultural patterns in Bulgaria and its impact on the environment. It is anticipated that the BAP will be able to obtain data on land use patterns, the extent of agricultural/pastoral landscapes, plant and livestock genetic resources and the threats to this diversity from the results of this project.
3. Limited data has been gathered on the existing environmental policy and regulatory framework and on incentive measures primarily by the USAID project. This data will be used and additional data will be gathered as appropriate on the cross sectoral policy and regulatory framework at an, national and regional level, relevant international policy and agreements. Examples of economic instruments for conservation and benefit sharing will be obtained from other countries to provide input into the development of similar mechanisms in Bulgaria.
4. The USAID project has a component for capacity building in the NNPS and has carried out an assessment of the capacity related to protected area management in MEW and MAFAR. Assessment of capacity related to biosafety is being done by the biosafety working group. During the BAP process an assessment of the capacity in cross-sectoral ministries, of national ex-situ conservation capabilities, taxonomic capabilities and that of local communities will be done.
5. To develop detailed sectoral action plans an in-depth assessment of underlying policy, institutional, economic and cultural causes needs to be done and linked spatially to threats.
6. The biosafety working group will assess the technologies needed to ensure biosecurity. During the BAP process, the working groups will assess additional technological needs.
7. An assessment of programs initiated since 1994 needs to be done. During preparation of the USAID project and National Report limited assessment were carried out.
8. Sustainable use and sharing of benefits were not considered during the NBDCS process and objectives for these will therefore be developed as part of action plan preparation.
9. Existing needs have to be assessed in light of the profound economic changes in Bulgaria.
10. Strategies for benefit sharing were not developed as part of the NBDCS process. The USAID project, however, has recently developed and implemented incentives for biodiversity conservation in 2 national parks. One of the goals of the USAID project is to identify and study alternative financing mechanisms to support biodiversity conservation in protected areas. These will provide input into development of actions for benefit sharing.
11. Bulgaria has prepared and submitted its First National Report to the CBD with its own resources. Funding is not being requested for this activity.

Annex 1. Detailed CHM Budget

Component	Costs (US\$)
Hardware (PC-Pentium II, 17" monitor, CDROM, Printer, Scanjet.	4,000
Software	1,000
Modem	300
Recurrent access costs to Internet	2,000
Technician set-up fees	500
Internet and Email training	2,400
Total	10,200