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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

Standing Committee

42<sup>nd</sup> meeting

Strasbourg, 28 November - 2 December 2022

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**Possible File: 2001/04**

**Follow-up of Recommendations 98 (2002) and 212  
(2021) on the project to build a motorway through  
the Kresna Gorge  
(Bulgaria)**

**- REPORT BY THE GOVERNMENT -**

*Document prepared by  
the Ministry of Environment and Water of Bulgaria*

**REPUBLIC OF BULGARIA****MINISTRY OF ENVIRONMENT AND WATER**

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**Complaint No. 2001/4 and Recommendations No. 98 (2002) and 212 (2022) on the project to build a motorway through the Kresna Gorge (Bulgaria) (Struma Motorway Lot 3.2)****Progress after the July 2022 Progress Report***27 October 2022***Progress towards the implementation of Recommendation 212 (2021):**

Following the established good practice from the previous reports to the Standing Committee, the MOEW invited the representatives of the complainants to elaborate a joint report on the progress in the implementation of Recommendation 212 (2021). Given the reluctance of the complainants to submit a joint report the Bulgarian authorities prepared independently the present updated information on the progress of the implementation of Recommendation 212 (2021) in addition to the report from July 2022.

**1. Development and adoption of site - specific conservation objectives**

The development of site - specific conservation objectives (SSCOs) for the “Kresna – Ilindentsi” and “Kresna” protected sites began in 2020. In implementation of its functional competences and obligations, the MOEW assigned their preparation to a team<sup>1</sup> of biodiversity specialists from the Bulgarian Academy of Science and the academic community in Bulgaria, with the participation of international experts engaged by the European Commission (EC). The key task of the international experts was to provide methodological and technical assistance to the State related to assistance and consultation in the elaboration of the SSCO for the two sites as the ground to devise a general approach for further actions in the development of SSCO for all Natura 2000 sites in Bulgaria. Thus, the international experts’ assistance focused in detail on the development of the necessary methodology, data requirements and structure of the SSCO in accordance with EC’s recommendations and best practices.

The consultations, advise and expert meetings carried out, were instrumental in clarifying a number of requirements of the EC regarding the necessary detail of the SSCO and the approach for their development. The team commissioned by the MOEW and the international experts developed unified approach and clearly defined the structure and the form of the SSCO, their parameters, the measurement units and the level of quantification of the target values for each species and habitat subject to protection in the protected sites, according to their individual ecological requirements.

The developed SSCO are accompanied by the relevant spatial digital data for the concrete areas and localities indicated in them – maps and geodatabase. The results of the implementation of the assigned activities for the development of SSCO for the protected sites “Kresna - Ilindenci” and “Kresna” were approved by the MOEW in October 2021 as executed with the necessary quality and detail and within the deadline required.

The approach adopted and work done, were evidently satisfactory to the EC, having in mind that in consultations in September 2021 it instructed that the same methodology must be followed for the elaboration of the SSCO for all protected sites in the country.

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<sup>1</sup> See Appendix 1 List of experts participated in the development of the SSCO of the “Kresna” and “Kresna-Ilindenci” protected sites

Recommendation 212 (2021) of the Standing Committee of the Bern Convention invites closer cooperation with all stakeholders in the finalization of the project and to that end as the joint report related to the File from 16.11.2021 stipulated a working group to review and discuss the draft SSCOs for protected sites "Kresna - Ilindenci" and "Kresna" was to be established. In February 2022, the Minister of the Environment and Water established a working group (WG) 1. The task of WG 1, however was much broader compared to the objectives declared to the convention in the joint report of 16.11.2021 and included establishment of a new approach for development of the SSCOs for the two protected sites. According to the Order for establishment of WG 1, it also had to determine the specific texts of the objectives and the regimes of the protected sites, which to allow their official designation.

We find it is justified to elaborate some considerations regarding this changed tasks, departing from the approach reported to the Standing Committee. The elaboration of the SSCOs for all Natura 2000 sites in Bulgaria is national commitment of utmost importance and the methodology developed for the "Kresna" and "Kresna-Ilindentsi" sites is consulted and adopted by the Commission Services as appropriate to be used. Changing the approach, structure, content and level of detail, at this advanced stage creates prerequisites for unbalanced/unmotivated decisions.

Moreover, the necessity and specific motives to change the main goal and the scope of tasks of WG 1 are questionable, especially with regard to the significant change in the methodology and the approach. WG 1 disregarded the agreements reached and progress achieved during the consultations held with the international experts engaged by the EC and the Commission services themselves.

As it can be seen from the type records and written notes of the activities of WG1, there is also an unbalanced attention and lack of unified approach when considering the objectives. The members of WG 1 focus their work solely and specifically on only 7 out of 134 protected species and habitats, which we consider as scientifically unacceptable and thus raises many questions as to the ultimate goal and tasks of the WG 1.

Instead of achieving the desired and expected result, namely discuss the SSCOs developed and adopted in 2021 as a whole and give its recommendations for the improvement of the already structured documents, WG 1 focused on changing the methodology already approved by the European Commission, modified the structure and information in the documents and, without motives brought concrete changes in the data and SSCOs only for the following seven species (*Emys orbicularis*, *Elaphe quatuorlineata*, *Zamenis situla*, *Testudo graeca*, *Testudo hermanni*, *Canis lupus*, *Ursus arctos*).

We believe that the tasks of WG 1, as defined, do not meet Recommendation 212 (2021) to "cooperate for the finalization of the SSCOs", instead the establishment and work of WG 1 suggests that the objectives of its members was to redefine the objectives for several species and predetermine the result of subsequent analyses and studies. Furthermore, a scientific method is not followed in the exerted changes, as the OSA experts mentioned repeatedly, this is a prerequisite *sine qua non* for establishment of constructive cooperation. Scientific arguments are lacking in the proposal of WG 1 and no written data and motives were presented for the proposed changes in the SSCOs. More detailed information is presented in the box below.

Despite the described situation, the MOEW approached the process transparently and ensured the participation of stakeholders and the public in the decision-making process, by publishing both the draft of the SSCOs for the two sites, developed with the participation of internationally recognized experts and adopted in 2021, as well as the SSCOs amended by the WG 1. Consultation period was from 16.07.2022 to 16.09.2022 and a significant number of comments were received. All opinions were considered and taken into account in the preparation of the materials for the National Biological Diversity Council (NBDC).

On its meeting held on 13.10.2022, taking into account the reasonable proposals of the WG 1, as well as all the opinions received during the Public consultation, the NBDC considered the proposals for SSCOs and decided to propose to the Minister of the Environment and Water to approve the SSCOs for "Kresna – Ilindentsi" and "Kresna" protected sites, in their initial structure, proposed by the expert team in 2021. The NBDC also proposed the SSCOs for the two sites to be refined by considering those proposals of the WG 1, which supplement and further develop the SSCOs and correspond to the approved by EC services methodology.

NBDC was convened under the currently acting Rules for the organization and the activities of the National Biological Diversity Council (Rules of Procedure), promulgated in the state gazette on 02.08.2022. The Rules

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of Procedure contains a clear and detailed procedure for the election of council members, including NGO representatives. As evident from the minutes of the NBDC meeting, in accordance with the existing Rules of Procedure, each member of the council expressed his/her opinion, including in writing. After the NBDC meeting, one council member presented a dissenting opinion. This dissenting opinion is an integral part of the minutes, despite the fact that it was not submitted in compliance with the Rules of Procedure of the Council.

**The Minister of Environment and Water approved the minutes of the NBDC meeting with the proposed draft decision for adoption of the SSCOs.**

**On 25.10.2022 the amendments to the orders for the designation of the two protected sites "Kresna - Ilindenci" and "Kresna" were published in the State Gazette with which the SSCOs for the two protected sites were introduced.**

***Main problematic amendments proposed by WG I on the SSCOs of the protected sites:***

- Change of the structure and overall presentation of the SSCOs as a coherent and logical scientifically based document. This departure was done without reasonable justification and disregarding of the methodology approved by the Commission Services.
- Part of the texts from the "Additional information" column, directly related to determining the current status of the species's habitats in the site, as well as to the analysis of the current connectivity of these habitats, have been removed.
- The working group did not accept the developed new habitat models for the target species. The latter were rejected without clear motives and it was stated that they lacked scientific credibility, without pointing any arguments in this direction.
- A new category of objectives has been introduced – **"priority objectives"**. This category is not derived either from the EU acquis or from the guidelines and instructions of the EC, incl. Commission Note on setting conservation objectives for Natura 2000 sites from 2012.

The methodology adopted in 2021, developed with the technical assistance of the experts engaged by the EC, does not provide for the development of priority objectives, as this is not required by the EC itself. The objectives themselves cannot be prioritized. Prioritization is done of the object/subject of protection, respectively the specific actions or nature conservation measures.

In the 2012 Commission Note on setting conservation objectives for Natura 2000 sites there is a clear distinction between the concepts of "conservation objectives", "conservation priorities" and "conservation measures", since quite often these three terms are used without making a conceptual difference between them. Despite the fact that they are apparently interrelated, they are separate concepts. The introduced concept of "priority objectives" is in contradiction with the Commission Note from 2012, according to which:

*"Conservation priorities are a determination of the most important species/habitats to take action for and/or the most important or urgent measures to be taken. Such priorities can also be established at different levels (EU, biogeographical level, national, regional, local/site level). Article 4.4 refers to the need of "establishing priorities" when designating a site of Community importance as a special area of conservation. However, it must also be recognised that a form of prioritisation was already done when the sites were selected for Natura 2000 and it is important to ensure that all Natura 2000 sites are managed in a way that ensures their contribution to FCS is optimized."*

In the same sense Decision of the Court of the EU on case C-849/19, paragraph 50 states that: *"determining conservation objectives is a necessary prerequisite for the designation of SACs and the establishment of conservation priorities and measures"*. I.e. the determination of the objectives precedes the determination of the conservation priorities and measures. For the proper definition of the conservation priorities it is very important to have properly defined conservation objectives.

Paragraph 53 of the same judgment states that: *"Although it is clear from Article 4(4) of the Habitats Directive that the designation of SACs and the determination of conservation priorities must be carried out as soon as possible, and in any event within a maximum period of six years from the time when a SCI has been selected under the procedure laid down in paragraph 2 of that article, that period also applies to the establishment of conservation objectives, given that those objectives are necessary for the purpose of setting those priorities and must therefore precede the setting of those priorities."*

In the context of the EC guidelines, priority should be understood as follows:

1. Sites of community importance that are exposed to stronger impacts and threats should be designated with priority as Special areas of conservation within the six-year period.

2. For species and natural habitats subject to protection in those sites, which are most endangered, the implementation of protection measures should be started with priority.

In this sense, the priority specified in Art. 4.4. of the Habitats Directive refers to priority in terms of taking actions to designate Special Areas of Conservation and accordingly - determining of specific objectives and measures to be implemented in a more urgent order.

• **The working group has made amendments to the SSCOs for 7 species out of the total of 134** types of natural habitats and species subject to protection in both sites, changing the structure of the document and deleting part of the information and data necessary to determine the specific objectives. Amendments have been made to the parameters concerning the following species: European pond turtle (*Emys orbicularis*), Four-lined snake (*Elaphe quatuorlineata*), European ratsnake (*Zamenis situla*), Greek tortoise (*Testuda graeca*), Hermann's tortoise (*Testudo hermanni*), \*Gray wolf (*Canis lupus*) and \*Brown bear (*Ursus arctos*). This approach of partially amended structure and data raises the question about the motives for this amendment, since if the objectives originally defined and the approach and methodology applied are not in principle of high quality, the WG 1 should make amendments for all species and habitats.

✓ **The changes concerning the herpetofauna refer to two parameters:** “Total area of suitable habitats of the species in the protected site” and ‘Connectivity of the habitats of the species’.

- The revisions related to parameter: “Total area of the suitable habitats of the species in the protected site”, refer to an amendment in the value of this parameter. Within the procedure for development of SSCOs the values of this parameter are determined by the experts based on a thorough analysis and detailed review of all the available data for the protected site, in accordance with the ecological requirements of the reptile species and a thorough review of all scientific publications in the field, therefore they should not be amended, even more so without conducting the necessary expert, analytical and time-consuming analyses. The target value only includes suitable habitats for these species and this complies with EC guidelines. The target value is reasoned in detail by the applied GIS analyzes and layers, as well as the analysis of all available data from registrations of these species. Species habitats should only include those that are certain to be suitable for the species and important to the species favorable conservation status, rather than covering the areas of all potential habitats.

The less suitable and unsuitable habitats should not be considered as an object for targeted conservation, since they do not correspond to the biological needs of the species. From an ecological point of view, such a paradigm is perfectly correct, because it would not allow changes in conditions that would be important to other species. This approach with regard to amphibians and reptiles was also adopted at a previous meeting of the NBDC for considering of developed SSCOs for other 41 protected sites. In this case, it was accepted that the area of habitats in the SSCOs should refer to the area of suitable and optimal habitats from the 2013 Mapping project of the MOEW, in the absence of other more accurate, up-to-date and statistically reliable data.

- The **revisions** to the parameter “Connectivity of the species habitats” concern five species of reptiles. The Working Group has removed the argumentation of the target value for this parameter, namely: “Absence of significant barrier effect in at least 20% of the length of existing artificial barriers” listed in the “Additional information” column. The removed text explains why the specified 10 sections were chosen and what is their length (this 20% represents 10 sections with a total length of 3.3 km). In the argumentation the WG 1 stated that the length of E79 road through the protected site is 15.5 km, not including the two tunnels and the three bridges over the Struma River. However, not the entire route causes fragmentation of the habitats of these species. In a big part of the route there is no possibility for animal passage, due to the specific characteristics of the terrain, for example steep slopes. As a result of the conducted field studies in the area, 10 sections of the E 79 road where the crossing would be possible were identified. The total length of these 10 sections is 3.3 km or 20% of the length of the existing artificial barriers. Without clarity on exactly what these areas are and how they have been determined, subsequent planning of measures to overcome habitat fragmentation would be impossible. Due to the removal of part of the text, it remains unclear why the target value for the parameter is the absence of a significant barrier effect in at least 20% of the length of the existing artificial

barriers and why no target is provided for reducing the barrier effect of E79 road, for the remaining 80% of its length.

✓ **Regarding the Brown Bear (*Ursus arctos*)** significant amendments have been made by the WG 1 to the parameters in the objectives table - additional data from the species-specific report have been added, the information about possible bear crossings through the gorge has been removed, as an indicator of habitat connectivity has been proposed "Area of suboptimal habitats providing connectivity of potential habitats with reference to the area of these habitats determined for the Gray wolf". We do not consider as appropriate the approach of automatically transferring the data and models for one species to another especially since the developed model of the suboptimal habitats of the wolf, to which is referred to, does not show habitat connectivity across the gorge, which contradicts to what is stated in the text for the conservation objectives for both species.

✓ **Regarding the Gray Wolf (*Canis lupus*)** - The WG 1 has changed the population unit - from "Number of family packs" to "Number of family pairs". The pack (family group) is the basis of the wolf's long-term survival and ensures its viable population. It should be noted that in the National Action Plan for the wolf in Bulgaria 2022 - 2031, the number of the species is determined in "family group" or "pack" and in individuals. From an ecological point of view, the pack is a basic population unit and in this sense it should not be changed. This was also confirmed by the international experts engaged by EC who consulted on the process of developing the SSCOs.

## 2. Working groups 2 and 3

The development of SSCOs is a requirement arising from the Habitats Directive. The presence of these objectives makes it possible to assess in a more complete manner the impact of the implementation of plans, programs, projects and investment proposals on the subject of protection in the protected sites.

In the specific case, regarding Lot 3.2. of Struma motorway, according to the instructions of the EC, a review of the findings in the 2017 EIA/AA report for the project is to be made, in the light of the newly adopted SSCOs for both protected sites. In this regard, an update of the comparison of the investment alternatives for the construction of Lot 3.2 of the Struma motorway is to be made.

The implementation of this task will start in working group 2, established by the Minister of Regional Development and Public Works (MRDPW), to develop a consensus scientific analysis of the compliance of the conclusions made in the Appropriate Assessments Report for project "Improvement of the route of Lot 3.2 of the Struma Motorway" with the SSCOs adopted by the MOEW for NATURA 2000 sites BG0000366 "Kresna - Ilindentsi" and BG0002003 "Kresna".

Working group 3 with the task of road safety and needs of local communities according to item 9 of the recommendation will start in parallel.

Currently, the composition of the two working groups established with order of the MRDPW is being updated and their work is about to begin based on approved SSCOs for both protected sites. It is planned that the first meetings of both working groups are held in the beginning of November 2022.

## 3. Results of the monitoring carried out by Road Infrastructure Agency (RIA)

Regarding the monitoring of the 4 key species of reptiles - two tortoises species (*Testudo hermanni* and *Testudo graeca*) and two species of colubrid snakes (*Elaphe quatuorlineata* and *Zamenis situla*) in the section of the first-class international road E-79 passing through Kresna Gorge, the monitoring activities are currently being carried out in the field for the fall season of 2022.

At this stage of the survey, for seven seasons (2020-2022), 545 live turtles of both target species were recorded: 407 newly recorded individuals and 138 recaptures. The data for the recaptured specimen confirms the observation that these two species stick strictly to their habitats, with the main part of them being found in the area of Yavorov railway station.

The summarized data from the studies carried out so far shows that of all recorded turtles, 35 became victims of trafficking (an average of 5 per season). Another 13 turtles were found dead other causes. The southern section (in the area of the Yavorov railway station) is confirmed as the most dangerous section, with 30 run over turtles, compared to 5 in the northern section. Another dangerous section is the area of the big bridge on the Struma River (at the estuary of Oshtavska River).

During the last monitoring season, new data were recorded for both target species of snakes – the Four-lined snake (*Elaphe quatuorlineata*) and the European ratsnake (*Zamenis situla*). The latter was recorded 4 times, but all hit by cars. Three snakes' undresses were found of the Four-lined snake. At present, the data confirms previous observations and described in the literature that the populations of these two species of snakes are among the least numerous snakes inhabiting the gorge.

The implementation of the contract for monitoring of the target species will continue until 15.06.2024.

#### **4. Implementation of road safety measures in Kresna gorge**

Regarding the 'Implementation of road safety measures' in the section of the first-class international road E-79, passing through the Kresna gorge, one of the goals set for the implementation of Lot 3.2 of the Struma motorway is to improve traffic safety and reduce the number of traffic accidents in the section with a very high concentration of traffic accidents. In this regard, measures were implemented to change the organization of traffic: a ban on overtaking in the section through the Kresna gorge executed with new horizontal marking and a physical separation of the traffic lanes with flexible restraints; new marking of the end lines; three boxes for stationary speed control cameras.

#### **5. Implementation of species protection measures in the Kresna gorge**

With regard to "Implementation of part of the mitigation measures on the impact of traffic on wild animals and birds in the Kresna Gorge", MOEW required the RIA to present an analysis of the effectiveness of the proposed mitigation measures. Expert biologists and ecologists prepared an analysis on the suitability of mitigation measures (passage and barrier facilities) - existing and newly designed - along the route of the E-79 road in the Kresna Gorge at the stage before the construction of Struma motorway Lot 3.2.

In response, on 01.08.2022, the MOEW issued Decision No. 10-OC/2022, which terminates the procedure initiated under the environmental legislation and practically blocks the possibility of applying the planned measures to mitigate the impact of the existing traffic on wild animals and birds in the Kresna gorge. This decision was taken by the previous political cabinet of the MOEW.

The decision was taken despite the actual field data from monitoring, which clearly shows the existence of viable and numerous populations of the both species of tortoises. In addition, the analyzes presented by RIA to the proposed emergency interim measures show that the suitability of all the proposed population defragmentation facilities can be rated as optimal or very high, and the proposed mitigation measures along E-79 road are applicable, feasible and effective relative to the identified impacts and the species subject to protection. Attached as evidence to the analysis are graphic and tabular materials depicting the location of all culverts (existing and planned) relative to the optimal habitats of the both species of tortoises and the two snake species in the section of the first-class international road E-79 passing through the Kresna gorge which indisputably show that the culverts fall entirely or partially in the area of the optimal habitats of the 4 target reptile species or are located in close proximity to them.

Despite the presented scientific data and arguments, the MOEW decided to end the procedure and not give the opportunity to implement species protection measures in Kresna gorge with the argument that they are with unproven effectiveness and presuppose the choice of an option for the implementation of Lot 3.2 of Struma Motorway. It is an indisputable fact that whatever option is chosen for this section of Struma Motorway, the species protection measures in the gorge must be implemented.

From road ecology point of view, the impossibility of implementing effective mitigation measures is simply a myth. The ethology of animals in relation to the road network has been the subject of active research in recent decades, in which five mechanisms of interaction between wildlife and infrastructure have been identified (Da Rosa & Bager, 2013): car avoidance, noise avoidance, road avoidance, road attraction and wildlife-vehicle-collisions. In general, an increase in traffic density may be associated with an increased number of WVC - wildlife –vehicle collisions (see Litvaitis & Tash 2008). This statement does not apply to all types of road infrastructure and to all types of animals. It is possible that with the reduction of traffic there will be an increase in mortality. Due to the road attraction effect based on increased resource availability (Erritzoe et al. 2003, Antworth et al. 2005), nesting areas (Aresco 2005) or thermoregulation in snakes (Sullivan 1981), the edge effect on the road can be strongly positive, as lower traffic can increase the number of collisions because it can reduce the effects of road avoidance and noise avoidance (Da Rosa & Bager. 2013). In non-technical

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terms, the animals that live in the banquette because they are attracted to the road, may start to come out on the road more often with lower traffic.

The wild mammals are known to move along the path of least resistance (Boone et al., 1996; Larkin et al., 2004). This is also true for the reptiles (Schippers et al., 1996). Many researchers suggest that use of wildlife underpasses or drainage culverts becomes a learned behavior over time (Foster and Humphrey 1995, Land and Lotz 1996, Clevenger et al. 2001a). Research has shown that fenced wildlife overpasses and underpasses significantly reduce WVCs and allow large vertebrates (Clevenger and Waltho, 2000; Foster and Humphrey, 1995; Dodd et al., 2007; Mata et al., 2008 and), but also to amphibians and reptiles (Dodd et al., 2004; Woltz et al., 2008; Mata et al., 2008) to cross roads safely. Buried fences dramatically increase the effectiveness of wildlife protection on roads (Clevenger et al. 2001b, Ruediger et al. 2006). The same was confirmed for tortoises by McCollister and Manen (2010). In many countries, special structures have been built to prevent tortoises from accessing the road, and these structures vary in their design (Huijser et al. 2008a,b).

For Struma Motorway, a team of experts (including environmental specialists, engineers and designers) presented to the MOEW a tortoise protection project based on the use of nets. In Bulgaria, the approved project was implemented for the first time on lot 1 of the Struma motorway. The design is quite similar to devices built to protect tortoises (eg, Gopher Tortoises, *Gopherus* sp. and Alabama Red-bellied Turtle, *Pseudemys alabamensis*) in the USA (Huijser et al. 2008a). Blocking the road using nets has proven to be an extremely suitable tool for reducing road mortality in tortoises (for review see Aresco 2005, Huijser et al. 2008a,b).

## **6. Conclusion**

In conclusion, the Bulgarian authorities welcome the progress achieved in the implementation of Recommendation 212 (2021) and will continue to support the constructive joint work and good cooperation with all stakeholders, including in relation to the work of the second and third working groups established by orders of the Minister of Regional Development and Public Works.

We consider that the authorities are continuously putting efforts to ensure the protection of the species and habitats but also the implementation of strategic transportation, economic and national security objectives in the development of this project.

In that regard **the Government is calling for not to open of a case file.**

Thus, we invite the Delegates and the Standing Committee to continue monitoring the case as a “possible file”.



## Appendix 1

### List of experts participated in the development of the SSCOs of the “Kresna” and “Kresna-Ilindenci” protected sites

<b>№</b>	<b>Title/Name</b>	<b>Position of the expert</b>	<b>Institution</b>
1	<b>Prof. Tsvetan Zlatanov, PhD</b>	<b>Key expert 1: Natural habitats</b>	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
2	Assoc. Prof. Desislava Sopotlieva, PhD	Expert: Non forest habitats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
3	Prof. Svetlana Bancheva, PhD	Expert: Non forest habitats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
4	Assoc. Prof. Vladimir Vladimirov, PhD	Expert: Non forest habitats and plants	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
5	Assoc. Prof. Stoyan Stoyanov, PhD	Expert: Non forest habitats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
6	Prof. Iva Apostolova, PhD	Expert: Non forest habitats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
7	Assoc. Prof. Nikolay Velev, PhD	Expert: Non forest habitats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
8	Assoc. Prof. Kiril Vassilev, PhD	Expert: Non forest habitats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
9	<b>Assoc. Prof. Dimitar Dimitrov, PhD</b>	<b>Key expert 2: Birds</b>	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences

№	Title/Name	Position of the expert	Institution
10	Prof. Pavel Zehtindjiev, PhD	Expert: Birds	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
11	Chief Assistant Nevena Ivanova, PhD	Expert: Birds	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
12	Chief Assistant Viktor Vasilev, PhD	Expert: Birds	Konstantin Preslavsky University of Shumen
13	Boyan Michev, PhD	Expert: Birds	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
14	Kristina Panova PhD student	Expert: Birds	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
15	Research associate Veselina Raykova	Expert: Birds	Regional Historical Museum, Varna
16	Hristo Peshev	Expert: Birds	Fund for Wild Flora and Fauna, Blagoevgrad
17	<b>Assoc. Prof. Anna Ganeva, PhD</b>	<b>Key expert 3 - Species</b>	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
18	Professor Dragan Chobanov, PhD	Expert: Invertebrates	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
19	Chief Assistant Boyan Zlatkov, PhD	Expert: Invertebrates	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
20	Assoc. Professor Apostolos Apostolou, PhD	Expert: Fish	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences

<b>№</b>	<b>Title/Name</b>	<b>Position of the expert</b>	<b>Institution</b>
21	Assoc. Professor Lachezar Pehlivanov, PhD	Expert: Fish	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
22	Chief Assistant Mariam Bozhilova, PhD	Expert: Amphibians and reptiles	Forest Research Institute Bulgarian Academy of Sciences
23	Assoc. Professor Borislav Naumov, PhD	Expert: Amphibians and reptiles	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
24	Assoc. Professor Simeon Lukanov, PhD	Expert: Amphibians and reptiles	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
25	Prof. Roumiana Metcheva, PhD	Expert: Mammals and Bats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
26	Yordan Yankov	Expert: Mammals	Freelancer
27	Assoc. Professor Ivan Pandurski, PhD	Expert: Bats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
28	Sirma Zidarova, PhD	Expert: Bats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
29	Prof. Vasil Popov, PhD	Expert: Bats	Institute of Biodiversity and Ecosystem Research – Bulgarian Academy of Sciences
30	Lybomir Dimov	Expert: GIS and database	Freelancer
31	Daniel Todorov	Expert: GIS and database	Freelancer