



EEB ANSWERS TO QUESTIONNAIRE OF DG AGRICULTURE

Brussels, 30 April 2004

Referring to the questionnaire on 'future policy orientations Rural Development', which was distributed at the ad hoc meeting of the advisory committee on rural development on 16 March, please find below the position of the European Environmental Bureau (EEB).

We have chosen to answer only those questions on which the EEB has a clear position. Before going into detail about the answers to your questionnaire, we would like to address the special concerns of the ten new member states and the need for increasing awareness and knowledge of environmental matters.

Special concerns for Accession Countries

There have been specific measures defined in Accession Treaties for the New Member States for the 2004-2006 period. These measures should continue to be available from 2007, as the period until 2006 will not be sufficient for proper implementation. The administrative capacity of accession countries must be strengthened by 2006 so that they will be able to use the opportunities provided by EU funds in full scale. Annex I shows some more specific concerns.

In the next programming the obligation to include agri-environmental measures in the rural development plans needs to continue. Otherwise some countries are likely to choose not to make use of them.

Need for environmental knowledge and awareness

There is a lot to gain for the environment, simply by increasing the knowledge and awareness of farmers and other land-users on environmental issues. Advisory services should advise farmers on how to access EU funds and on how to draw up management plans that comply with the EU environmental legislation and meet the minimum environmental standards. The emphasis must be on cross compliance and environmentally sensitive management practices. This will require more funding, especially in accession countries, both at administrative and land-user level.

Question 1: investments in agricultural holdings

Investments in agricultural holdings have to fulfil sustainability and animal welfare criteria. Along with a plan demonstrating the economic viability of a scheme, an Environmental Impact Assessment should be required to avoid investments in environmentally damaging enterprises. Investments should also be used directly to stimulate new environmentally friendly technologies and processes. The production of renewable energy is an example, however only under condition that environmentally friendly methods are used (e.g. excluding oilseeds).

Question 4: Less Favoured Areas

Less Favoured Area payments are necessary to keep agriculture in places where it is required for biodiversity and/or landscape purposes. These purposes should therefore be the main criteria for defining LFAs and consideration be given to not only reviewing existing designation (where over-compensation is evident in this respect), but revising the title of this scheme (for example environmental areas

at risk). With de-coupling taking place, it no longer makes sense for these schemes to focus on production disparities and thus provision of 'income support' as its main objective. For example, the criteria should be adapted to regional environmental (and social) values like fresh water ecosystems, extensive livestock systems, natural and semi-natural grasslands and certain landscapes where they have recreational or tourism value.

Funds should not be allocated on the basis of remoteness only. The LFA approach should therefore be maintained but more effectively targeted at high nature value areas where the need to meet broad environmental objectives is more appropriate (i.e. adopting the characteristics of a simplified agri-environmental scheme). Unlike most agri-environmental schemes, which target specific outcomes and which are dependent on voluntary uptake by farmers, LFA designation should include targeting particular types of habitat or landscape at risk and a farmer will find himself automatically in an LFA (as with the 'Nitrate Sensitive Areas'). Receipt of LFAs payments should be dependent on farmers not only adhering to Good Farming Practice requirements (see question 7), but additional 'light green' conditions that reflect the environmental (and social) needs of a particular LFA (e.g. low input or preservation of traditional high nature value farming systems). There should also be a clear understanding of where LFAs overlap NATURA 2000 sites, providing a clear indication of where Article 16 should be applied.

Question 5: effectiveness of agri-environmental measures

Some schemes proved to have been successful, for others we do not have the data to assess their effectiveness. The Commission should have clear data on which to base an assessment. This question shows that there is a strong need for monitoring. Schemes are to be adequately monitored and the Commission should devise clear indicators targeted to what the specific aims of the schemes are. Member states tend to put more emphasis on competitiveness than environmental issues. The demand and uptake of agri-environmental measures across Europe needs to be increased and the schemes need to be made more competitive. Therefore at least 50% of rural development funds, which should represent the core of the CAP, should be earmarked for agri-environmental measures. Funding for organic agriculture which is an important part of agri-environment also needs to be secured. A significant amount of rural development funding should be allocated to the management of Natura 2000 sites (and application of article 16 made mandatory as part of national RDPs). Eligibility criteria for rural development funding should be expanded in order to enable other relevant stakeholders, not just farmers, to apply.

Question 6: efficiency of agri-environmental measures

Agri-environmental measures should not be targeted or restricted to particular areas. Every land-owner or farmer in the EU who wants to implement measures with positive environmental effects should be able to access these funds. Instead of targeting the support according to the type of area, it would be more beneficial to grade the funding according to the level of intervention required by the scheme. Any management practice that would achieve goals above the minimum environmental standards (i.e. going beyond 'respecting' Good Farming Practice) would qualify for funding, graded according to the measures taken and objectives to be met. This should be organised following a pyramid scheme, with a simple 'entry' level available to all with more targeted or specific measures as one moves up the pyramid, i.e. maintain>restore>protect and create habitats as the changing objectives. The more ambitious and environmentally valuable these measures are, the more funding would become necessary. These measures should contribute to the implementation of EU policies and strategies. However, most of the schemes implemented so far have been designed to achieve soil and water protection, decrease pesticide use or similar

issues. We would welcome provisions that would commit more schemes specifically to increase biodiversity.

Question 7: Good Farming Practice

There should be one baseline for receiving both direct payments and pillar two support. This would also be less confusing for the farmers. This baseline should be set at the level of Good Farming Practice, which should go beyond statutory requirements. The current definition of Good Farming Practice differs too much between member states. To reduce this the Commission should define a strong EU framework for the definition of Good Farming Practice. The GFP framework should reflect all CAP and environmental objectives (environment, animal welfare, cultural landscape, etc.). Member states should then develop detailed criteria adapted to regional conditions (climatic and other) which have to be approved by the Commission. Annex II shows examples of issues that should be included in an EU level framework for Good Farming Practice.

Question 8: Forestry

The EEB is not in favour of supporting afforestation except for conservation purposes such as water management, water protection, landslide prevention, prevention of erosion in mountainous areas or the restoration of habitats and the creation of ecological corridors. Annex III proposes criteria for types of afforestation that should be excluded from financial support.

Investments in existing forests are to be maintained for sustainable forest management and training for that purpose, selective cutting instead of clearance, restoration of habitats, labour intensive management, reducing the use of heavy machinery, support for non-timber forest products, in particular wherever they can replace products made of non-renewable material.

Support should be made available both to private and public forest owners.

Funding for forest fire prevention should be put in only one regulation, i.e. the EAGGF. There should be one fund for one purpose instead of having it in both the Forest Focus Regulation and the EAGGF, as it is currently the case.

Question 9: delivery mechanisms of agri-environmental measures

The compensation of agri-environmental measures should ideally not be based on income foregone, but they should be payments for the added value and the environmental services provided (biodiversity, recreation of habitats etc.). Also, certain 'dark green' measures will require payments up to 20 years, as guarantee for land-owners who sign up for these measures and to ensure continuity.

This would also ensure that these agri-environmental measures can 'compete with' afforestation measures, which qualify for 20 years funding, especially in areas where afforestation would not have detrimental effects on biodiversity.

ANNEX I

Specific concerns for accession countries:

- **LEADER+ type measures** are required – this kind of measure will grant the possibility to local and regional groups to promote and implement sustainable development, while at the same time involving them in nature conservation activities. It will not be sufficient to run these pilot projects only in the period 2004-2006, taking into account the current situation in the accession countries and today's level of experience in public co-operation on the local level.
- **Farm advisory and extension services** are essential for an appropriate attitude towards environment in farming practices and organizational management. Special support is particularly needed in the implementation of agri-environmental measures, good farming practices, cross compliance and extensive farming practices and production methods. NGOs should be given the possibility to be involved in these services as partners.
- **Producer groups** have to be stimulated for organic farmers who will have a stronger need and longer time to strengthen their position. This is especially important to 'nurture' the new generation of organic farmers, which is expected to result from the support given to agri-environmental schemes.
- **Compliance with Community standards (merged with CAP reform meeting standards)** will need urgent attention. Some countries need a longer timeframe to comply with veterinary and sanitary standards, which enables producers to be eligible for any Direct Payment support - the 3 years period 2004-2006 will be not sufficient.

ANNEX II

The following elements are examples of an EU level definition of Good Farming Practice (GFP). The list is not meant to be exhaustive.

- A minimum percentage of arable land must be defined for existing, permanent landscape features providing necessary wildlife habitats (e.g. hedges, ponds, walls, tree lines). It should be attractive for the farmer to participate in programmes supporting this.
- GFP must include basic requirements in terms of fertiliser application and minimised use of chemicals and pesticides, taking on board the principles of an integrated approach to farming. For example, total herbicides like Roundup must not be used. The goal should be to optimise the use of farm organic fertilisers so as to minimise the use of synthetic mineral fertilizers.
- Rules on crop rotation for soil health and higher diversity of cultivars
- Requirements for soil protection (to avoid erosion, compaction and improve soil fertility)
- Avoidance of the use of GMOs
- Rules on grassland management (e.g. mowing and cutting)
- Rules on water use to prevent excessive water abstraction and the negative impacts of excessive irrigation (e.g. lowering of water tables, salinisation, waterlogging)
- Regulations on animal husbandry: minimum and maximum stocking densities (to avoid over-grazing, compaction and pollution due to excessive nutrient inputs, or scrub encroachment); animal welfare rules; rules on antibiotics and medicines.

ANNEX III

The following types of afforestation should always be excluded from financial support:

- Plantations, GMOs, alien species
- Where a negative impact on an area with high conservation value is to be expected, e.g. marginal land with a high level of biodiversity
- Afforestation of agricultural land where it is in competition with agri-environmental schemes, i.e. where risk of reducing uptake of agri-environmental schemes due to afforestation measures which are more financially rewarding

The following conditions should be attached to funding:

- Ecological planning / management plan or Environmental Impact Assessments should be mandatory prior to afforestation.
- Limit afforestation to a certain percentage (catchment areas under the Water Framework Directive could be used as reference area)

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