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Options and tools in reaching a greener CAP
NGO Meeting on advocacy tools, experience exchange
and lobby cooperation on CAP and RDP implementation
11–12 June 2014, Budapest

CEEweb with the contribution of EEB organised a meeting on options and tools in reaching a greener Common Agricultural Policy (CAP) on 11-12 June 2014 in Budapest with 12 NGO participants from 10 countries to discuss the current situation of the CAP reform and Rural Development Plans (RDPs) and to find out common ways to jointly try to turn them to green at national level. Indeed, one of the new characteristics of the reformed CAP is the flexibility left to the Member States for implementation. They will benefit from a great room for manoeuvre in the greening and thus, NGOs still have various means to influence Pillar 1 implementation as well as to channel greener practices into the Rural Development Programs. The goal of the event was to achieve this and to unite NGOs in the Central and Eastern European region.

During the event, participants were informed about the current state of play of the CAP, relevant timetables and action options, whereas NGO representatives also introduced national developments and involvement in terms of national RDPs. During the meeting, the measures of EIP and LEADER were also introduced as well as the new Green Infrastructure Strategy and the biomass and bioenergy issues to map overlapping issues of the biodiversity and agriculture agenda.

Participants:

- Stefan Avramov: Bulgarian Biodiversity Foundation
- Iris Benes: BED, Croatia Ecological Society, NGO and producer
- Andrejs Briedis, Latvian Fund for Nature
- Faustine Defossez: EEB, agriculture working group
- Oskars Keiss, Latvian Fund for Nature
- Silvia Lotman: Estonian Fund for Nature
- Veronika Mikos: European Center for Nature Conservation, Netherlands
- Tatiana Nemkova: 'Birdlife Slovakia, Birdlife Europe
- Julija Petrosiute: Lithuanian Fund for Nature
- Nat Page, ADEPT and Chair of the Rural Development Working Group, CEEweb
- Malgorzata Siuta, CEEweb
- Agnes Zolyomi: CEEweb

The event started with a welcome speech of Nat Page, Chair of the CEEweb's Working Group of Rural Development and the general introduction of the twelve participants. This introduction was followed by the presentation of Faustine Defossez from the European Environmental Bureau on where we are now on the CAP.

Where we are on CAP – state of play from a Brussels perspective: Faustine Defossez, European Environmental Bureau (EEB)

Overview: Status of CAP reform, scope of flexibility in implementation, matrix of info was collected from members for preliminary info on what member states are doing for Pillar I, cross-compliance, etc.

TIMETABLE

- April 23: partnership agreement to be sent to the European Commission (EC)
- End of June: Pillar 1 (P1): publication of delegated acts and implementing acts, Pillar 2 (P2): publication of delegated acts and implementing acts
- July 23: draft Rural Development Programmes (RDP) sent to the EC
- August 1: P1: information on green implementation – Ecological Focus Areas (EFAs) eligible implements, use of conversion matrix, collective or regional implementation of EFAs, equivalence schemes commission shall assess information on flexibility, for MS that have not modulated in 2014, they can notify the EC for the period 2015-2019
- October 1: P1: Additional management criteria for nitrogen fixing crops
- December 15: Designation of strictly protected grasslands outside N2000 sites.

WHY CAP REFORM?

- Environment and agriculture are fully interlinked with biodiversity
- Some farming systems are better than others/more sustainable
- 80% of CAP budget going to 20% of farmers, encouraging large farms/cereals/unsustainable farms
- Small does not always mean sustainable, though!
- 77% of citizens requested stricter compliance with environmental measures for direct payments
- Tax payers are paying three times: subsidies, market, environmental costs
- Commission's proposal: step in the right direction but unable to address challenges
- Co-decision process has led to dilution of green elements

Final result: green washing, complicated tests, risk of stepping backwards

- Conversion of P2 money to P1 now an option
- All permanent crops are green, new thresholds for polyculture, etc. – problem!
- E.g. France: farm-level grassland protection has moved to state-level, loss of 5%
- EFAs – what can be grown in these areas? France asked for rape seed, soy...
- Co-decision: 1) commission proposal, 2) 1st reading in the parliament, 3) 1st reading in council
- Anti-democratic process of voting for amendments
- Co-decision is supposed to be a democratic, beautiful process, but this went wrong with CAP

To illustrate green washing:

- weak link between payments and greening mechanisms
- 5% EFAs (maybe 7%), includes crops, short rotation
- grassland protection at regional or national level
- crop diversification at 2 (10-30h) or 3 crops (above 30h)
- EFAs only for farms over 15 ha
- no protection of carbon rich soil and peat lands, wetlands

- no reference to Water Framework Directive and sustainable use of pesticides Directive
- minimum 30% compulsory spending for the environment ... **BUT** this includes Less Favoured Areas (LFAs) and investment measures
- now possible to use up to 25% of P2 for P1 or modulate between two pillars up to 15% either direction.

After the presentation of Ms Defossez, NGO delegates started their discussion on what opportunities are still left for NGOs to achieve greener measures and kind of cooperation steps can be achieved.

What opportunities are still left for NGOs to advocate for greener RDPs and Direct Payment – Discussions on a common NGO strategy – Part I.

Failures:

- 47% of EU farmland not accountable to rules re: biodiversity
- 26.4% of arable land (more than 94% of farmers) have no requirement to carry out meaningful crop diversification
- 18% absolute decrease in P2 funding across EU
- delegated acts led to further watering down of greening (e.g. no line to insist on less pesticide use in EFAs, though already required, suggesting that MSs may add more as they like, but knowing that MSs will not likely to do more than required!)
- weighting factors for nitrogen-fixing crops from .3 to .7

However: there is still some flexibility as regards implementation, which should be tackled by NGOs to strive for greener measures.

TIMING

- By July: Commission receives first official drafts of RDPs. Commission will comment. Member States can be pressed change those elements of RDP on which Commission has commented.
- 1 August: notification by MS of implementation of key elements from greening, can still modulate funding between Pillars
- implementation of new CAP begins 2015

WHERE DOES FLEXIBILITY MATTER?

- cross compliance: GAEC implementation. For example, GAEC 7 on retention of landscape features is important as it will dictate conservation of hedges.
- Greening: EFAs and environmentally sensitive grasslands protection: MS are seeking loopholes, for example, in France it's possible that maize with soil cover may be considered polyculture!

NGOs must strive for ambitious GAEC baselines!

- retention of landscape features
- EFAs and environmentally sensitive grasslands protection in and out of N2000. MSs are asked to map grasslands for protection within N2000, more if MSs choose to. This is related to MAES (Mapping of Ecosystem Services) by 2020.

To try to achieve greener measures, NGOs shall consider the steps below when realizing their lobby strategy.

INGREDIENTS FOR SUCCESS

- Involvement of Environment Ministries at national level in greening implementation
- Effective consultation and participation of environmental NGOs in cross compliance and greening implementation process – P2. NGOs are involved in monitoring in some MSs – in France for example
- Advocate for advisory services! Not only how to implement them, but why are they important, what do they mean for your farm, economy, etc.?

DISCUSSION ON COMMON STRATEGY

a. Greening in MSs

- o we should use peer-reviewed research on plants in biodiversity
- o bad to include landscape elements in EFAs

b. Germany will map all grasslands in Natura 2000, France says they will work on mapping areas outside of N2000, but they won't map all grasslands in N2000

- o not clear who does the mapping/who invests in mapping?
- o there is no objective definition of endangered grasslands
- o Croatia will not map; we have four databases (stats, etc.), almost 40% of Croatia is N2000, but different criteria in different databases, and there is little known about grasslands. We've been arguing for common pastures but this hasn't worked.

c. Equivalence

- o allows for flexibility for farmers under different schemes, certifications...

d. Transfers between Pillars

Some countries will move money from P1 to P2

- Latvia is moving 6.15% from P1 to P2 but none of it is going towards environmental measures, it's actually a net loss for the environment
- Estonia, now P2 is bigger than P1, and LFAs will not be included
- in Slovakia, they are moving 21% for 7 years to boost poultry and pork industries

e. Coupled support: other elements on implementation choices

coupled supports are being popular especially for livestock and protein crops, livestock support, proteins, and others (cotton, horticultures, vegetables)

f. Other elements

- Former LFAs top up
- Small farmers scheme: how do we measure support amount? Small farms may be defined, not by size by Hectares, but by productivity

OVERVIEW ON RDPs FROM THE PARTICIPANTS

• ROMANIA

- Romania is doing digressive payments under P1
 - o payments themselves are a good idea, but they are using a threshold of 5ha, over 30ha is standard payment and 1-5ha farms are deliberately being encouraged to consolidate
 - o small farmers also – there are too many and not enough budget.
- One success: cutting dates varied according to altitude, mechanized regulations which were asked for last time (someone is listening!)

- Cooperation measure – budget very small, missed opportunity to help small farmers
- Romania has no N2000 payments
- Cross-compliance needs improvement.

- **ESTONIA**
 - No public discussion on cross-compliance
 - Agri-environmental measure, greenwashed last year, no water protection measures in this package
 - Support for semi-natural habitats
 - Little public discussion because only some people understand. We organized online debate re: organic farming vs lobbyist/big farmers b/c talking about biodiversity measures was ‘too far out’ for the general public audience
 - What do we need? Keep up to date with the policy changes
 - no-plough scheme for peat soils?

- **SLOVAKIA**
 - IPM for vegetables, fruit
 - Support for family farms needed – no definition of family farm on EU level
 - Greening: no discussion officially b/c they are not obliged, but we send letters about RD and greening – the latter part of the letter was ignored
 - No GAEC on grasslands

- **LITHUANIA**
 - farmers arguing that they want equal direct payments
 - less attention for forest measures
 - no more support of fast rotation plants for bio fuel
 - will support measures against invasive species, will cut invasive plants and then implement integrated scheme
 - there non-productive investment measure
 - protection of soil and water.

- **BULGARIA**
 - pastures were destroyed under previous period. New map of subsidized pastures, huge differences b/w this and map from ministry of environment
 - removed bushes and trees with heavy machinery, important habitats for N2000 species were destroyed; complaints were made but not heard
 - 25 mil Euro compensation for N2000 measures
 - heavy pressure for more direct payments
 - discussion of pastures could be useful
 - colleagues are involved in submitting information to the Ministry.

- **ECNC, NETHERLANDS**
 - Netherlands: functional agro-biodiversity in sustainable agriculture, optimising ecosystem services to increase sustainability of agricultural production and produce incentives for farmers to preserve biodiversity
 - ECNC does not work with farmers directly, but with publications, organizations, and other ways of disseminating information
 - problem of land ownership vs. encouraging farmers to invest in the long-term
 - a-e grants: should be seen as temporary, to start the process: measures should work without subsidies later
 - short-term contracts do not equate to long-term thinking.

▪ **CROATIA**

- This is new for Croatia - just joined the EU in 2013
- Some are obliged to follow green practices, but many do not want to
- What does 'greening' mean in real time; what do we look for?
- Need to know how to follow up with these things from CAP
- landscape measures – dry stone walls, hedges, catch crops, but none to come in before 2016
- RDP submitted in April

▪ **LATVIA**

- not mulching for many consecutive years proves a good thing for flowering plants
- EFAs focus areas – bushes? not hedges, not trees. stone heaps in fields from drainage during soviet times, but these elements are not included. Comment: Faustine – MS can add these by the 1 August
- management complexity classes for grasslands in the future, but the interim phase means average payments for all; however, this may last for the entire period. asking for deadlines!
- integrated horticulture and vegetable production – not much to do with environment
- no N2000 payments for agricultural areas, only forest areas which are compensations for economically non-viable areas
- more CO2 in soil than in trees
- questioning the definition of agricultural activity in grasslands
- fight against the soya farmers
- if saplings are more than one year old, then area is excluded from ag area
- Latvian Fund for Nature and Birdlife Latvia are consulted in processes, though the commission has a better idea of monitoring committee in drafting the program

BIRDLIFE EUROPE MAPPING OF MAIN ISSUES

BirdLife identified 4 main issues in its mapping:

1. application of partnership principle – new rules this period, including environmental NGOs – budgeting, most MSs NGOs are involved, but impact on actual RDPs is very limited. Too many closed doors with little explanation. NGOs are supposed to be involved in this. NGOs should have been involved and in budget allocation. Also, monitoring evaluation framework. NGOs did not receive funding in order to participate.
2. very little money allocated for biodiversity schemes. MS should really invest in BD measures, but opposite cases are happening. Some exceptions exist. CEE region doesn't have enough. Agri-environment is big, IPM, etc., but these are not necessarily beneficial. Preference should go for targeting schemes rather than broad/landscape level schemes.
3. MS feel the 30% minimum spending isn't helpful, and much of this goes to LFAs. Argument that LFAs shouldn't be included in this 30%.
4. These measures potentially jeopardize biodiversity – forest roads, other investments in forests, support for biomass

Tackling the dangers of the bioenergy and biomass in the CAP Faustine Defossez, European Environmental Bureau (EEB)

- bioenergy shares are bigger than other renewable energy sources – crops for bioethanol, etc. – this displaces food production to outside of the EU, limit is now at 7% not 5%
- So, risk of RDPs being used in an unsustainable way to meet certain objectives
- pushing for having short-rotation coppice in EFAs
- Articles that may be relevant: 17 – investments in ag holdings; 19 – farm business and development; 20 – basic services and village renewal in rural areas: setting up distribution networks for heat, elec power, biomass and other renewable sources, large-scale can be supported; 21-26 – investment in forest area development and improvement of the viability of forests: 26 is bad – environmental value of forest ecosystems; 35 – co-operation: pilot and demonstration projects for renewable energy, horizontal and vertical integration in sustainable provision of biomass – but no definition of what that sustainability looks like
- Potentially relevant: 14 – knowledge transfer and information actions, 15 – advisory service, farm management and farm relief services, 27 – setting-up of producer groups and organizations, 42-44 – LEADER.

Green Infrastructure (GI) and the RDPs, Agnes Zolyomi, CEEweb for Biodiversity

According to European Commission, Green Infrastructure is a strategically planned network of natural and semi-natural areas with other environmental features designed and managed to deliver a wide range of ecosystem services (in terrestrial, aquatic, coastal, marine environments). In short, the structure enabling healthy ecosystems to deliver their multiple services to people. On land, GI is present in rural and urban settings and in protected (such as Natura 2000) and non-protected areas. Green Infrastructure can be an important hook for agricultural development (e.g. landscape measures, HNV measures, greening measures, etc.) with the potential to provide multiple financing and support from other EU sources and enable multiple benefits – please note the European Commission is about to produce a guideline on Green Infrastructure and agriculture. Also, CEEweb with the cooperation of ECNC produced [a knowledge hub on Green Infrastructure](#) to facilitate information exchange with farmers stakeholders group to be in the focus.

Green Infrastructure shall enable development of greener rural areas contributing to the followings:

- Making space for ecosystems; strengthening the functionality of ecosystems for delivering goods and services, such as carbon sequestration, water retention, functional landscapes, habitats for wildlife
- Mitigating and adapting to climate change effects
- Health-related and social benefits
- Cost-effective solutions (e.g. disaster protection, flood control)
- Connecting protected and non-protected areas

SUMMARY: MS FEEDBACK ON GREEN-NESS OF MEASURES

GOOD	BAD
<p>LITHUANIA – less attention on forest measures, less money No support for fast rotation for biofuels Non-productive investment in IAS Integrated aquatic warbler scheme – restoration List of sensitive grasslands – grassland measures Priority for mixed farms</p> <ul style="list-style-type: none"> - veggies - seeds <p>ROMANIA: cutting grades based on altitudes non-mechanized higher</p> <p>ESTONIA: excl. of LFA AEM is a bit better grasslands better scheme GL eligible for SAPs</p> <p>LATVIA:</p> <ul style="list-style-type: none"> - organic farming measure! - New measures – AEM and climate – no BIDI (management of HNV grasslands) - Ban mulching of grasslands, mown once per year - differentiation of payment level depending on management complexity, until then, avg. payment - integrated veg and horticultural - buffer belts (water quality) - water dykes restoration (soviet era) <p>CROATIA (2016)</p> <ul style="list-style-type: none"> – non-material innovation scheme, rest and IAS - 3 different grassland measures - olive orchards - carp fishponds? – extensive - crex crex and butterfly measures and red - landscape measures – hedge growth, dry stone walls - genetic resources (2014-15) 	<p>No GAEC on grasslands</p> <p>ROMANIA:</p> <ul style="list-style-type: none"> - degressive payments because of scheme 140 eur/ha 5-30HA, <30 HA – standard payment - criteria too high - small farmers’ scheme – 10k max. - young farmers’ scheme - cooperation measures very low, .13% <p>SLOVAKIA:</p> <ul style="list-style-type: none"> - 3% of bidi measures - no public discussion on Pillar I - no water protection measures - no Natura 2000 (N2K) payments, peat soil <p>LATVIA</p> <ul style="list-style-type: none"> – funding decreased from 20 to 30 mil. - green areas – winter crops, big money - no N2K payments for forests, 140 eur/ha if no economic activity - ecologic resilience of forest, clear cut of ecologically important trees – aspen if bushes > 1 yo then no agri area <p>CROATIA</p> <ul style="list-style-type: none"> – no N2K payments <p>BULGARIA</p> <ul style="list-style-type: none"> – pastures destroyed due to ploughing - 25k euro payments N2K - cleaning pastures from bushes- susliks breasted geese, Egyptian vultures

The workshop was closed with an action list to do for NGOs including the preparation of concrete ideas for greening measure suggestions to RDPs, to make active contact with the desk officers in DG Agriculture and DG Environment from European Commission, to map and include Green Infrastructure measures to RDPs and to actively participate in the conference *Rural Development in actions – how can they work towards a healthier environment?* to be held on 15 September in Brussels.

With the contribution of EEB



The event is financially supported by the European Commission

