

The Strategic Guidelines for the new Rural development regulation

Response by BirdLife International

BirdLife International and EEB welcome the creation of Strategic guidelines for rural development in the EU. Despite its still relative weak financial relevance within farming policies, the Rural Development Regulation will have a crucial role in supporting rural communities, restore and maintain farm and woodland habitats and its associated biodiversity, all of which are currently in serious decline; their protection is a priority objective for the sustainable development of the EU and at the core of public interests. Rural policies should have a main role in meeting commitments to halting biodiversity decline across the EU; the strategic guideline should recognise this role and reinforce the conceptual framework around the policy processes and EU commitment to it. We believe that the Strategic Guidelines should in particular refer to:

1. National, EU and international commitments to sustainable development

Devote a relevant part of the text to highlighting the main political processes that have defined the targets for sustainable development (Convention on Biological Diversity, Gothenburg, Salzburg, Lisbon, Kiev, Malahide) as the main source of policy directions for reform.

The strategy should not be prescriptive in what MS should choose as rural development measures but act as a reminder of the main targets and commitments the EU has: halting biodiversity decline by 2010 (Gothenburg 2001) and achieving a competitive and knowledge based economy (Lisbon), and ask MS to justify their choice of measures and programs based on such priorities.

Farmland and forest biodiversity and farmland and forest habitats' protection are identified as a priority action area in the Rural Development Plans. A comprehensive and integrated approach should be used when drafting programs, looking at the complementarities with the use of structural funds, objectives and targets of programs and different spending lines.

The Guidelines should also make specific reference to the interim report on the Agriculture Biodiversity Action Plan, which in 2004 identified the rural development policy framework as the main instrument to achieve biodiversity protection, in particular through the use of Agri environment measures (Malahaide conclusions). As the legal text of the new rural development regulation fails to emphasise this role appropriately, this should be explicitly expressed in the Guidelines.

2. Policy integration

The Strategy should clearly state that horizontal and axes' priorities should be interlinked and should not be achieved in isolation, but according to the principle of sustainability. The Strategy should provide a framework that identifies general targets for each axis but still refers to shared targets and provides examples. If, for example, one of the targets for Axis I was to increase competitiveness of agricultural products, the measure to achieve it should be chosen within the range of those activities also able to generate employment or/and a better status of the environment (axis II and III)

It should specify that MS should give priority to measures that achieve secondary sustainability targets (cross axes) simultaneously. The positive role that organic farming plays in this respect should be emphasised.

The Guidelines should require MS to justify the choice of priority targets and measures in the context of achieving not only targets but also cross targets amongst axes.

3. Pillar I and environmental legislation

The strategy should clarify that the role of rural development funds on environmental matters is to achieve objectives beyond those defined by environmental directives and legal obligations. No rural development funds should be used by MS to achieve compliance with the legal obligations arising from environmental directives (ex WFD) but only to support measures that are clearly linked to the delivery of a range of public goods (such as landscape and nature conservation) and water quality and go beyond environmental baselines .

We recognise that these specifications are issues for the implementing regulation, but the strategy should nevertheless act as a reminder of the principles behind rd support.

4. Participation of stakeholders

The Strategic guideline should emphasise the importance of including stakeholders participation from the early stages of RD plan drafting, that the consultation process is carried out in an effective way and truly enables different views to be expressed. All across the EU there are striking examples of governments' failure to run appropriate consultations. The Strategy should act as a reminder of the importance of this process in order to ensure that plans will actually achieve their goals.

5. Equal emphasis on competitiveness and environmental sustainability

The Guidelines should remind MS that competitiveness should be achieved not only in narrow economic terms but should rather express the long term viability of business, including their environmental sustainability.

The guidelines should require MS to justify measures chosen in support of medium enterprises versus the needs of small ones and should remind MS that local economic viability is a priority target for regional development. For this reason, plans that for example support medium size enterprises that have got the potential to squeeze the small ones out of business should be avoided.

6. The importance of protecting the farmed and forested Natura 2000 areas.

The Strategy must stress the importance of halting biodiversity decline and strongly encourage MS to use the Natura 2000 payments instrument to this end. MS should be reminded of their commitment and environmental obligations towards the Birds and Habitats directives, the supported implementation of which will have multiple benefits, for example in other environmental policy fields such as soil, water and climate protection.