

Mr. Mihail Dumitru
Deputy Director General
Directorate-General for Agriculture and Rural Development

27 November 2014

RE: NGO concerns about insufficient considerations for priority concerning protection of natural resources in the new RDPs

Dear Mr. Dumitru,

In June 2014, we had the pleasure of meeting with you to discuss the new generation of Rural Development Programmes (RDPs). With more evidence¹ coming in that greening of pillar 1 of the Common Agricultural Policy will do far from what was desired, it has become clear, that the only way to reverse the deepening of the environmental crisis is to use available RDP measures efficiently towards environmental objectives.

In September 2014, you kindly attended and provided the keynote speech at the Rural Development conference "*Rural Development Programmes in action post 2014: how can they contribute to a healthier environment?*" jointly organized by CEEweb, EEB, BirdLife Europe and ADEPT. On both occasions, you reassured us that the Commission will take great care to ensure that Member States translate the priority concerning protection of natural resources into well designed and appropriately resourced measures.

We are writing to you again now, when many Rural Development Programmes are in the final stages before approval by the European Commission, to highlight the serious concerns we have.

Whilst we are very happy that many of the problems we highlighted in the draft RDPs were shared by the Commission, and have been reflected in the observation letters, we deplore the fact that it has taken the Commission so long to decide to release these crucial documents. This delay has seriously hampered our partners' efforts to negotiate effectively with authorities at national level.

¹ Science article published on the 6th of June « Eu agriculture reform fails on biodiversity »
<http://www.ufz.de/index.php?en=1625>

We are particularly concerned that a significant number of countries - at least 16 - fail to adequately invest in ecosystems and will therefore struggle to deliver effective protection of natural resources. We remain concerned that many Member States are planning to use RDP funds as income support for intensive farming systems by designing broad and shallow schemes with extremely limited environmental benefit. In the same vein, targeted schemes, such as those for the protection of biodiversity, are either missing or are seriously underfinanced. It is unacceptable and alarming that budgets allocated for biodiversity-focused agri-environment and climate measures (AECM) have decreased compared to 2007-2013 period in so many countries. We are also concerned that effective safeguards for investments (such as forest roads, irrigation and hydromeliorations) have not been put in place to ensure that valuable ecosystems, including those in Natura 2000, are protected from any harmful impact.

We are fully aware of the need to provide clarity on the new RDP rules to farmers and foresters as soon as possible in order to allow business planning and to avoid any delivery gap between the current and new programming periods. However, this need must not be met at the expense of the quality of RDPs. Even if future revisions might provide an opportunity to address such problems in the future, it is only during the initial RDP adoption phase where the Commission has such a major role in influencing and checking strategic choices and budget allocations – an opportunity which cannot be missed.

In the attached briefing we summarize the key issues to be addressed in the most problematic countries and call on the European Commission to ensure that draft Rural Development Plans are revised accordingly before they get adopted. If these changes are not made, Rural Development policy will fail to deliver its priority to protect natural resources.

We thank you for the attention you will give to our concerns and would welcome a meeting to discuss them with you in person.

Ariel Brunner
Head of EU Policy
BirdLife Europe



Pieter de Pous
EU Policy Director
European Environmental Bureau



Briefing: Key priorities that need to be reflected in RDPs

<p>BELGIUM <u>Wallonia</u></p>	<ul style="list-style-type: none"> • The budget for “biodiversity schemes” within the AECM package should not be decreased but maintained at least at 2007-2013 levels; • Provisions should be included to ensure that AECM MC9 will be automatically accessible to farmers using AECM MAE7 during the 2007-2013 period. This is important for continuation of extensive farming. • Ensure that AECM payments can be <u>accumulated</u> with Natura 2000 payments, in cases where the AECM measure offers higher levels of environmental delivery. This is necessary in order to motivate farmers to implement interventions with high ecological delivery within the Natura 2000 network.
<p>BULGARIA</p>	<ul style="list-style-type: none"> • The budget for “Natura 2000 and WFD payments” measure should not be decreased but maintained at least at 2007-2013 levels (EUR 108,8 million) • A forest-environment measure should be included.
<p>CYPRUS</p>	<ul style="list-style-type: none"> • Ensure that the funding for the Natura 2000 measure is significantly increased (3-4 times more than currently proposed) and that the measure is improved by including elements with tangible environmental benefits (delayed harvest, leaving stubble, leaving fallow on part of the land). • Ensure that the proposed AECM package is significantly upgraded so it has a meaningful impact for biodiversity. This includes the introduction of a new, adequately financed measure for the support of HNV farming. • Safeguards should be included ensuring that investments in irrigation do not have detrimental effect on the environment.
<p>CZECH REPUBLIC</p>	<ul style="list-style-type: none"> • Ensure that the budget for “biodiversity” AECM is kept at least at 2007-2013 levels. • Improve ecological delivery of the measure for the management of grasslands by introducing a condition of leaving unmown strips on land parcels bigger than 5ha. • Enhance the ecological delivery of a forest- environment measure by improving its design and increasing eligible area and at the same time introduce effective safeguards ensuring that investments in forest do not jeopardise valuable ecosystems, including in Natura 2000.
<p>DENMARK</p>	<ul style="list-style-type: none"> • Measures in AECM should be strengthened to include: Support for development of organic, including cooperation, processing and local sale; Support for extensifying production in vulnerable areas.
<p>ESTONIA</p>	<ul style="list-style-type: none"> • Ensure that the target area and budget for the “maintenance of semi-natural communities” AECM is increased to the level indicated in the PAF (45 000 hectares). • Additional water protection AECM should be included and ensure at least 5 meters wide buffer stripes, with permanent vegetation, alongside secondary ditches and canals (the current 1 meter obligation from Water Act is insufficient).
<p>FINLAND</p>	<ul style="list-style-type: none"> • The share of funding for the horizontal entry-level AECM scheme should be decreased from the current 50% (approximately) to 25% at most. Funding from the entry-level scheme should be made available to all applicants to

	<p>the most effective measures within the AECM package. These include several measures for biodiversity and water protection (including semi-natural grassland management, buffer zones, biodiversity fields).</p> <ul style="list-style-type: none"> • The payment levels for the biodiversity and semi-natural grassland management measures should be increased so that they better correspond to the real costs of land managers. At the moment the payments for the semi-natural grassland management covers about 20-50 % of the estimated costs. • Ensure that farmers/other land managers have an opportunity to apply to the most effective measures and contracts every year of the programming period. This requires allocation of funds to the last years of the period.
GERMANY Brandenburg-Berlin	<ul style="list-style-type: none"> • Ensure that biodiversity delivery of the AECM package is significantly enhanced by the inclusion of well-designed and adequately-financed measure for arable land and result-oriented measures for grasslands.
GREECE	<ul style="list-style-type: none"> • Expenditure for measures aiming at restoring, preserving and enhancing ecosystems related to agriculture and forestry and contributing to biodiversity preservation and focusing on improving water and soil management and preventing soil erosion should not be decreased and kept at the level of July 2013 proposal which was 1.640.629.642 € (total public expenditure)
HUNGARY	<ul style="list-style-type: none"> • The budget for AECM package and organic farming should not be decreased but kept at the level of 2007-2013 period. • Ensure sufficient financing for developing Natura 2000 management plans and for biodiversity-focused non-productive investment.
ITALY	<ul style="list-style-type: none"> • Ensure that well-designed and adequately-financed schemes for the management of meadows, taking into account ecological requirements of grassland birds, are introduced or improved. • Safeguards should be introduced ensuring that prior any support for bioenergy production, use and cumulative impact has been assessed and addressed. • Provisions should be introduced ensuring that natural and semi-natural habitats restored with previous RDPs are maintained through new RDPs.
LATVIA	<ul style="list-style-type: none"> • Ensure sufficient funding (at least on the level of 2007-2013 period – 30 million EUR) for the management of semi-natural grasslands, the only measure targeting biodiversity in the draft RDP. • Ensure that the prescribed management intervention takes into account ecological requirements of different grassland habitats
LITHUANIA	<ul style="list-style-type: none"> • Ensure that alongside the scheme for the protection of aquatic warbler, other targeted, well-designed and adequately-financed biodiversity measures are included, as proposed by NGOs and the Ministry of Environment. • Ensure that for investment in physical assets (M04) and investment in renewal of drainage systems, effective safeguards are included ensuring that objectives of Natura 2000 are not compromised.
POLAND	<ul style="list-style-type: none"> • Ensure sufficient funding for biodiversity schemes within the AECM programme. The minimum should be at the level of the 2007-2013 RDP budget.

	<ul style="list-style-type: none"> • Remove degressive payments in the agri-environmental-climate measures, as these will lead to decrease of biodiversity scheme uptake. • Ensure extension of AECM “bird package” to areas laying outside SPA Natura 2000 (SPA represents only 17.82% of country area, from which only 32% are arable land, meadows and pastures – in effect under current proposal only 5.7% of the country is eligible for the scheme).
PORTUGAL	<ul style="list-style-type: none"> • Ensure that the budget for active management of agricultural and forest Natura 2000 is at least 300M EUR, to put it in line with the needs estimated in the PAF. • Ensure that no RDP funds can be used for the expansion of eucalyptus plantations and new irrigation schemes.
ROMANIA	<ul style="list-style-type: none"> • At least maintain the area eligible for HNV grassland payments (M10) as in previous programme, and preferably increase it to the level proposed on 1 March by Ministry of Agriculture and Rural Development. Where areas proposed for M10.3.1 overlap with the previous HNV-eligible areas, the species-specific packages should be offered as an option, as species-specific measures shouldn't be applied on the landscape level. This will allow continued maintenance of HNV grasslands, and provide options for interventions addressing ecological requirements of species which needs a late cutting date. • Make the small farmer measure (M6.3) more accessible by reducing the threshold set for minimum economic output for eligibility. The current minimum economic output is €8000, excluding over 90% of IACS-registered farmers, who are the logical target for the scheme. • Increase the budget for cooperation measure (M16), and give the measure more emphasis in Rural Development (encouraging cooperative production, marketing, short food supply chains etc.)
SLOVAKIA	<ul style="list-style-type: none"> • Ensure that the budget for biodiversity management measures on agriculture land and forest (AECM, Natura 2000 payments, forest-environment) is at least at the level of 2007-2013 RDP budget. (150M EUR) • Introduce an AECM measure for the protection of grassland birds (delayed mowing). Such a measure was part of 2007-2013 RDP and omitted now without any sound justification. • Ensure that the eligible area for forest-environment measure is extended to areas under 2nd degree of protection and that ecological delivery of the measure is enhanced by inclusion of the requirement to ensure presence of dead wood.
SLOVENIA	<ul style="list-style-type: none"> • Double (at least) the budget for organic farming in order to meet RDP target for organic area and get closer to national Organic Action Plan targets • Ensure sufficient funding for biodiversity management measures and ensure that premia of “biodiversity intervention’ are competitive • Ensure that investments in forests (forest roads) cannot be built in the most valuable ecosystems and that land consolidation projects do not damage Natura 2000 areas.
SPAIN	<ul style="list-style-type: none"> • Ensure effective safeguards for irrigation projects, which include real savings in modernization projects targeted at saving water and respecting of WFD environmental objectives and priorities in new irrigation projects.

	<p>When land consolidation is part of the project, maintenance or restoration of landscape features must be ensured.</p> <ul style="list-style-type: none"> • Ensure sufficient budget for biodiversity agri-environment schemes necessary for promoting good management of farming areas within Natura 2000 sites. According to NGO study (SEO/BirdLife Spain, 2008), 480M EUR are needed.
SWEDEN	<ul style="list-style-type: none"> • Ensure that the budget for organic farming is substantially higher than during the last period to meet the increasing consumer demand. • Increase funding for natural pastures AECM
UK <u>Wales</u>	<ul style="list-style-type: none"> • Ensure there is no further reductions to the AECM budget, currently set at 60% of the RDP, and ensure that an ANC scheme is not established. • Scheme design and implementation must ensure that priority farmland and woodland biodiversity is provided with <u>complete</u> ecological requirements at the scale needed to support populations.