

# Polish CAP strategic plan

## Transition to sustainability or (bad) business as usual?

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### What is at stake

The Polish agricultural sector has been affected by both intensification and abandonment of agricultural areas. Both processes have contributed, and continue contributing, to a significant decline in biodiversity in agricultural landscape. The crippling effects are evident: farmland birds have decreased by 20% between 2000 and 2020, and wetlands and peatlands are being irreversibly lost, despite their importance for climate change mitigation. This is bad for nature and for farmers alike. We need breakthrough solutions and real transformation, but for this to happen, political will is needed, the lack of which is confirmed by the unambitious Strategic Plan for the Common Agricultural Policy 2023–2027.

### What is wrong with the Polish CSP

- Inadequate baseline to protect wetlands, peatlands and water bodies: The GAEC 2 standard, which should protect wetlands and peatlands critical for preventing and mitigating the negative effects of climate change and conserving biodiversity, will not come into force until 2025. The justification for this delay is questionable, and will result in more key wetlands being destroyed. The GAEC 4 pesticide-and-fertilisers-free buffer strips along water courses will be only 3 meters wide, hence insufficient to effectively protect water from pollution.
- Half of the eco-schemes failing to deliver for the environment: 60% of the €3.810 billion earmarked for eco-schemes will have no positive impact on the environment, climate, or biodiversity. They will support the continuation of current ineffective greening practices (e.g., crop diversification, catch crops and nitrogen-fixing crops), the replication or very little improvement beyond baseline (e.g. fertilizer management), and practices whose positive environmental impact is already questioned (e.g. no-till practices or integrated plant production system).
- Good schemes lack adequate funding: Eco-schemes with the potential to address environmental problems lack funding, and have unambitious area targets (e.g. water retention on grasslands, allocation of 7% of arable farmland to non-productive areas and organic farming).
- Support potentially harming the environment: Interventions for up to €400 million will harm the environment and biodiversity, interfering with the course of rivers or affecting the state of water regime (e.g. construction of hydroelectric power plants, construction of dams, river regulation, creation of new or dredging and renovation of existing ditches, digging artificial ponds on wetlands). There is also a risk that it will be possible to subsidize the digging of deep wells, contributing to the depletion of already scarce resources in deeper aquifers.

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■ Coupled support driving unsustainable production: Poland intends to allocate almost €2.6 billion to this environmentally harmful type of support. This considerably exceeds the total amount of €0.74 billion foreseen for all agri-environment-climate interventions implemented under Pillar II, aimed at protecting meadow habitats and rare bird species or supporting biodiversity on arable lands. Among various types of production, field tomato growing is to be subsidized, which is unreasonable given that it is unprofitable in Poland due to poor climate conditions.

## This is how the Polish CSP can help the transition to sustainability

■ Putting in place a strong baseline to protect wetlands and well-designed eco-schemes: The standard should prohibit the conversion of the wetlands into arable land and the alteration of their water regime by creating drainage. The eco-scheme on water retention on permanent grasslands needs to expand eligibility for all permanent grassland, without any additional conditions, and widen the target area of support. No (potentially) harmful investment for wetlands, rivers, and streams should be financed with public funds.

■ Supporting paludiculture: This innovative solution to maintain adequate peatland hydration should be available for all Polish farmers.

■ Enhancing voluntary measures to support biodiversity: Areas supporting biodiversity on farmland are disappearing in Poland. It is vital to create and maintain baulks, mid-field woodlots, and small wetlands. The target of 10% of nature on agricultural land won't be achieved unless targets and budget to support such type of areas are increased (e.g. allocation of 7% of arable land on farms to non-productive areas, perennial flower strips).

■ Protecting all valuable grasslands on Natura 2000: Even though GAEC 9 aims to protect valuable agricultural semi-natural habitats against ploughing on Natura 2000 sites, only 51% of valuable grasslands are designated as environmentally sensitive and, hence, protected. The target of agri-environmental intervention for habitat protection on Natura 2000 sites must be also increased to make a difference for these habitats.

■ Stepping up support for organic farming: The negative impact of plant protection products on biodiversity is well documented. Urgently reducing the dependence of crops on pesticides and artificial fertilisation is pivotal. However, the result indicator of the eco-scheme for organic agriculture is only 3.52% of the area under organic cultivation in relation to the total area used for agriculture, which is too small of an increase compared to the current levels (about 3.4%). An increase to at least 10% is needed to comply with EU objectives to increase the area of organic crops in the EU to 25% by 2030. A similarly not enough arable land area will be supported under the eco-scheme on biological crop protection.

