

# Slovenian CAP strategic plan

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

### What is at stake

In Slovenia, animal husbandry is still the predominant form of farming, despite the extremely low self-sufficiency in the production of fruit (36% in 2020), vegetables (48%) and potatoes (60%). Small farms are either abandoned or being taken over by large ones. The majority of small and a fair portion of medium-sized farms are economically not viable: they simply cannot compete with large, intensive producers from other parts of the EU. Biodiversity has been suffering large declines since joining the EU in 2004, as shown by monitoring of farmland birds, qualifying birds of Natura 2000 sites, qualifying grassland habitat types and butterflies. CSP only addresses these issues partially, with little improvement to be expected.

### What is wrong with the Slovenian CSP

- Massive support for animal husbandry continues to be in Slovenia's focus (coupled support for cattle, suckler cows, milk production in alpine areas, sheep, and goats). No incentives are available for the gradual reduction of the number of animals, which would be an important contribution to reducing greenhouse gas emissions.
- Exemptions from conditionality making it irrelevant: GAEC 8 standards (non-productive landscape elements) will only be obligatory for farms with >10ha of arable land. Given that the average size of Slovenian farms is 8,2ha, it is clear that the majority of farms will not be obliged to follow GAEC 8. Those exempted will be required to dedicate only 4% of arable land to landscape elements, the bare minimum required by the EC framework. This is far below 10% set in the Biodiversity Strategy to 2030.
- Investments in forests driving environmental destruction: New investments will be poured into the construction of forest roads and tracks and cutting machinery, including on Natura 2000 sites. This will increase annual felling, decrease the amount of dead and dying trees and bring human disturbance into forests, harming sensitive species, such as the Capercaillie, the Hazel Grouse, the Three-toed Woodpecker, the White-backed Woodpecker, and the Middle-spotted Woodpecker.
- Voluntary schemes for grasslands failing to deliver conservation value: Eco-scheme rules will allow for up to three times the cutting of meadows with no restrictions regarding the use of fertilizers or first possible cutting dates. Such frequent use prevents the setting of seeds, impoverishing the in situ seed bank and ultimately decreasing the quality of the meadow. Some AECMs are a clear example of greenwashing, like the measure for extensive grasslands that allows too early cutting dates (as early as 20 May in some areas) or measures for integrated plant production. The latter is quite similar to conventional production and has no proven benefits for biodiversity.

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

- Increasing support for the gradual transition towards a more plant-based food production.
- Putting in place a strong baseline through enhanced conditionality, especially for GAEC 2 (together with wetlands and peatlands, wet meadows should be included as well), GAEC 8 (it should be obligatory in all farms, the percentage dedicated to landscape elements should be 10% including grasslands and not only arable land) and GAEC 9 (it should include and restore all current grasslands on all Natura 2000 sites + all the grasslands lost since joining the EU in 2004).
- Avoiding investments with detrimental impact on Natura 2000 forests. No new roads and machinery should be financed.
- Retargeting subsidies on Natura 2000 sites from harmful agromeliorations to restoration of grasslands, creating landscape elements and other minority habitats that were destroyed by past agromeliorations since the 2004.
- Redesigning eco-schemes and AECMs. The subsidies should only support measures that benefit the environment and biodiversity.

