

**Health Check of the Common Agricultural Policy:
Wildlife and Countryside Link Position Statement
On New Challenges: Climate change, bioenergy, water management and
biodiversity**

Wildlife and Countryside Link (Link) brings together voluntary organisations in the UK concerned with the conservation, enjoyment and protection of wildlife, countryside and the marine environment. Our members practice and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity.

Taken together, our members have the support of over eight million people in the UK and manage over 476,000 hectares of land.

This position statement is supported by the following organisations:

- Association of Rivers Trusts
- Buglife - the Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign for National Parks
- Campaign to Protect Rural England
- Council for British Archaeology
- Froglife
- Grasslands Trust
- Herpetological Conservation Trust
- Open Spaces Society
- Plantlife International
- Ramblers' Association
- Royal Society for the Prevention of Cruelty to Animals
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust

Commission proposal

With the ceiling for the overall CAP budget fixed until 2013, additional funding for rural development can only be realised through an increase in compulsory modulation. The additional funding is needed to reinforce the efforts with regard to the EU priorities in the field of climate change, renewable energy, water management and biodiversity.

The justification for directing the additional money towards these policy areas is given in the amendment of the Community Strategic Guidelines on rural development. The mandatory consequences with respect to the modifying the already existing RD programs 2007-13 are spelled out in an amendment of the Council Regulation on rural development (1698/2005). In this Regulation the following provisions are essential:

- *An amount equal to the amounts resulting from the application of the compulsory modulation shall be spent by Member States in the period from 1 January 2010 to 31 December 2015 as Community support under the current rural development programmes for the operations (Article 16a of the amended rural development Regulation) approved after 1 January 2010.*

- *Member States may base their choice of operations falling into the scope of the New Challenge on the indicative list of types of operations set out in the Table shown below (Annex II of the amended RD Regulation). This Table is non-exhaustive and MS could also program under the heading of the New Challenges other measures which are related to the potential effects listed in this Table.*

Link position

Link is pleased that biodiversity has been identified as one of the New Challenges.

Link considers it essential that measures to address climate change are introduced into both pillars of the CAP. However, as the Commission recognises, there will be a substantial additional cost for implementing measures needed to adapt farmed land to address the effects of climate change on biodiversity and it is crucial that adequate funding is provided to deliver these measures.

Link agrees with the abolition of support payments for growing crops for the production of biofuels. Recent evidence suggests that the contribution of biofuel crops in reducing global warming is limited. Link is also concerned that support for biofuels could encourage increased intensification of production making biofuel crops unsustainable both in terms of global warming gases and land use.

Water management measures will similarly need to address both existing challenges on water quality, reinforcing those being addressed by the Water Framework Directive, and changes to land use to manage water to deal with the challenges that arise from climate change, including storage of flood water and coastal realignment.

However, we note the caution given on page 34 in the Impact Assessment under 'Environment' that *'the effect on rural development schemes from the increased focus on the new challenges will depend on the final agreed package'*. Link would be concerned if emphasis of focus on the New Challenges led to some Environmental Stewardship objectives being given precedence over others given the funding available to the scheme and its multi objective nature.

While we agree with the view of Defra that the RDPE will play a key role in delivering objectives for the New Challenges we think there is now a strong case for the UK to argue that the CAP needs to move beyond an agricultural policy, particularly since it has now been decoupled and payments are subject to environmental conditions under cross compliance. Link has set out its perspective on the future of the CAP in our *Beyond the Pillars* document and we think that the UK desire to see the CAP evolve into a policy that focuses more strongly on the delivery of environmental public goods would be well served by setting out a broader vision along these lines. Such a policy would reward farmers for their delivery of public goods and in doing so contribute to the viability of farming, and would make a genuine contribution to the new challenges the Commission has identified.