

Wildlife and Countryside Link Response to the 1st Public Consultation on the CAP “Health Check”

January 2008

Wildlife and Countryside Link (Link) brings together UK voluntary organisations 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 response is supported by the following organisations:

- Association of Rivers Trusts
- Buglife - the Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- Council for British Archaeology
- Friends of the Earth
- Herpetological Conservation Trust
- Plantlife International
- Rambler’s Association
- Royal Society for the Prevention of Cruelty to Animals
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust

1.2 Cross Compliance

- *What would be the potential outcome of maintaining the cross-compliance at its existing standards?*

Link believes that cross compliance has brought significant benefits to the farmed environment across Europe and is helping European taxpayers to understand the importance of farm support. There should not be any weakening of current cross compliance conditions and efforts should be made to improve its efficiency and impact in all Member States¹. The Single Payment Scheme guarantees that farmers deliver a minimum level of environmental public goods and animal welfare standards through the need for farmers to follow Statutory Management Requirements and GAEC standards. Link would like to see the scope of cross compliance encompass a wider range of environmental features on farmed land. Link would also like consideration to be given to extend cross compliance to include new legislative standards for animal welfare, for example those contained within the Broiler Directive and Laying Hens Directive.

¹ Farmer and Swales (2004), The development and implementation of cross compliance in the EU15: an analysis, IEEP report for the RSPB; Swales (2007), The likely effects of cross compliance on the environment, A Research Paper of the Cross Compliance Network; Farmer and Swales (2007), Future options for cross compliance, A Research Paper of the Cross Compliance Network, Deliverable 23

- *What impacts do you see emerging with the possible addition/deletion of certain legal requirements or GAEC standards?*

Link would have serious concerns should any of the Statutory Management Requirements or GAEC standards be deleted. In addition to ensuring diffuse pollution issues are covered under cross compliance Link believes there is scope to add some further GAEC standards to cross compliance. For example to include protection for all types of field boundaries, ancient woodland, veteran trees, traditional orchards, and historic environment features. Cross compliance should be extended to ensure a baseline of protection is provided for these features.

Permanent grassland, where it is wet or unimproved, can be of the most important farmed habitats in the EU for biodiversity and for the protection of archaeological sites, and it is also an important carbon sink². Link believes that cross compliance should be strengthened to ensure permanent grassland is protected where there are benefits for biodiversity, historic environment features and landscape.

Link believes that there is also scope to amend Annex IV of Council Regulation 1782/2003 in order to climate proof it for the future. This could be achieved through amendments to the fourth issue in Annex IV to ensure resilience, avoid the deterioration of habitats and landscape character and to assist in the expansion and connection of habitats (thereby also helping to deliver Article 10 of the EU Habitats & Species Directive). Currently the standard listed in Annex IV 'Avoiding the encroachment of unwanted vegetation on agricultural land' restricts member state's ability to avoid the deterioration of certain habitat patches from damaging adjacent intensive agriculture, and it thus actually acts in contradiction to the spirit of the Annex. In the UK it prevents the buffering and expansion of certain habitats which would increase their resilience and help mitigate and adapt to climate impacts. For example buffering and expansion of habitats should include scrub mosaics targeted on arable and improved grassland adjacent to woodland.

1.3 Partially coupled support

Link supports the use of National Envelopes and believes the Health Check should take the opportunity to assess where and under what conditions they could be used to support specific farming sectors that are facing difficulties in terms of economic viability but which play an essential role in maintaining landscape character and wildlife habitats.

2.2 Cereals and set-aside

- *Do you consider that abolition of set-aside in the current context of market and policy developments is appropriate?*

Link was disappointed to learn of the decision to move towards a 0% set aside rate for the coming year which pre-empted the opportunity within the Health Check for a more considered change in policy by undertaking an environmental evaluation of alternative mechanisms. Consequently, there could be serious implications through the loss of both

² JRC & EEA (2006) Proceedings of the expert consultation "Sustainable bioenergy cropping systems for the Mediterranean", Madrid, 9-10 February 2006; Vellinga, V; A. van den Pol-van Dasselaar and P.J. Kuikman (2005), The impact of grassland ploughing on CO₂ and N₂O emissions in the Netherlands. Nutrient Cycling in Agroecosystems 70: 33 – 45.; Freibauer, A; M.D.A. Rounsevell, P. Smith, A. Verhagen, Carbon sequestration in European agricultural soils, Soil Science Review, 2004.

permanent set aside, that is currently creating an extensive area of important wildlife habitat, buffering water courses, extending semi-natural habitats, protecting archaeology and enhancing landscapes, and rotational set-aside which is providing an important food source for farmland bird populations. Set-aside plays an important role in meeting the EU Gothenburg target of halting biodiversity decline by 2010, as well as Water Framework Directive targets for achieving good ecological status in water bodies. Link is seriously concerned about the potential for continued loss of the environmental benefits of set aside and believes it must not be abolished without any replacement mechanism.

- *What measures do you consider appropriate in order to maintain environmental benefits associated with set-aside?*

Link believes that a new mandatory mechanism should be introduced before set aside is abolished that requires each farm holding receiving the Single Farm Payment to designate a percentage of land for environmental measures to protect water bodies from diffuse pollution, retain important wildlife habitat and add to the diversity of the farmed landscape. This could be best accomplished by creating a new cross compliance measure until a new mandatory EU wide requirement is introduced as this would ensure all farms provides similar environmental benefits a those delivered by set aside. There is an urgent need for an assessment to be made of the amount of land that would be needed on each holding to replicate and enhance the environmental benefits that the considerable public investment in set aside policy has provided since its introduction.

Additionally, the extent of the land management activity required for the particular benefits that set aside has provided for biodiversity, such as for farmland birds³ and bumblebees⁴ in particular, means that there may be a need for these management activities to be incorporated into existing or new agri-environment measures. Such measures must be accompanied by an additional transfer of ring-fenced funding from Pillar I to Pillar II to ensure that adequate resourcing is provided without placing more pressure on existing budgets for agri-environment schemes.

In addition a report for the UK's Land Use Policy Group⁵ recommended that "the most realistic and beneficial way to retain the environmental benefits of set-aside would be to develop a package in which:

- General, countrywide, environmental protection benefits arising from set-aside are delivered through adapted cross-compliance conditions;
- Specific, high value, environmental benefits arising from set-aside are delivered through agri-environment scheme targeted measures; and
- The environmental benefits arising from energy crop growing are maintained and enhanced through a single, simple energy crop scheme."

³ Bracken & Bolger (2006) Effects of set-aside management on birds breeding in lowland Ireland. *Agriculture, Ecosystems & Environment*. **117**, pp. 178-184; Buckingham, D. L., A. D. Evans, and A. J. Morris (1999) Use of set-aside in winter by declining farmland bird species in the UK. *Bird Study* 46: 157-169

⁴ Pywell *et al.* (2004) Providing foraging resources for bumblebees in intensively farmed landscapes. *Biological Conservation*. **121 (4)** pp. 479-494

⁵ Cumulus Consultants (2007) Retaining the environmental benefits of set-aside: a policy options paper. A report for the Land Use Policy Group
http://www.lupg.org.uk/pdf/pubs_Retainingenvbenefitsofsetaside07.pdf

3.1 Climate change, bioenergy, water management and biodiversity

- *Do you consider that existing instruments under both pillars of the CAP are sufficient to respond to these challenges?*

Existing measures are inadequate. Link considers it essential that measures to address climate change are introduced into both pillars of the CAP and our comments in 2.1 above on Annex IV of Council Regulation 1782/2003 are also relevant here. However, it is important to recognise that 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 would like to see public support payments for biofuel production abolished. 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.

- *If you consider that strengthening Rural Development instruments is needed, what would be your proposal in better addressing these new challenges?*

Link welcomes the proposal to increase funding to Pillar II. It is essential that the Health Check results in more funding becoming available for rural development. In the longer term we believe the CAP must evolve to support sustainable land management and to address the environmental challenges we are facing and in the short term an increase in rural development funding is crucial to achieve this.

We seek a radical re-orientation of land management policies to:

- protect and restore our wildlife and habitats;
- protect and enhance our historic environment, landscapes and woodlands;
- ensure the sustainable use of our limited water and soil resources;
- help mitigate and adapt to the challenges arising from climate change; and
- ensure the secure and sustainable production of animal welfare friendly food and other commodities.

In order to deliver this re-orientation of land management we propose moving beyond the current two pillar mechanism of the CAP, split between a decoupled farm payment and support for rural development, and instead develop a single European Sustainable Land Management Policy. This would be used to support positive land management activities that deliver sustainable land management and could in turn underpin profitable farm businesses and prosperous rural communities. Rather than most of the money in the CAP being paid in the form of decoupled production payments, attached to legal compliance, in future payments would be targeted to those undertaking a wide range of positive actions that deliver sustainable land management and the public goods identified above.

3.3 Strengthening rural development

- *Do you think the proposed increase in modulation will help in achieving RD objectives, especially those linked to new challenges?*

Link strongly supports the Commission's proposals to increase the rate of compulsory modulation and believes that the additional funding will be vital in addressing the new challenges that have been identified. However, Link believes that any changes to the rates of compulsory modulation should not impinge upon the option for some Member States to voluntarily modulate at a higher rate in order to fund agri-environment measures.

There remains a need for additional funding to meet rural development objectives in Member States. Link's policy perspective on the future of the CAP estimates that the costs for meeting commitments for the Biodiversity Action Plan in England are in the region of £300m per year. Full delivery of other environmental public goods, for example for landscape and historic environment features, across all of the designated and undesignated countryside of England will also require extensive funding.

- *How do you think the extra funds should be allocated to better respond to those new challenges?*

Link would like to see the extra funds raised from increased compulsory modulation deployed within Axis II of the EAFRD for agri-environment measures. This would help to address the shortfall in funding for rural development as a consequence of the EU Financial Perspectives decision of 2005. Given both the current and new challenges facing Europe's environment agri-environment schemes, a substantial increase in funding is needed to deliver the changes to land management that are required. It will be particularly important to target agri-environment schemes at traditional farming systems that manage and enhance Europe's high quality landscapes and which maintain important wildlife habitats and historic environment assets.

Additionally, adapting farming practices to make them more sustainable will also be important so that agriculture across each Member State can reduce its emissions of greenhouse gases and protect soil and water resources.

Wildlife and Countryside Link
11 January 2008