

EURAF response to the Commission “Recommendations to Member States on their CAP Strategic Plans”



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The Commission has made recommendations to all 27 Member States as its contribution to the national “structured dialogues” they are engaged in to prepare their CAP Strategic Plans. These are based on the Commission's analysis of the “state of play, the needs and the priorities for agriculture and rural areas in each country”. The recommendations “address the specific economic, environmental and social objectives of the future CAP and in particular the ambition and specific targets of the Farm to Fork Strategy (F2F) and the Biodiversity Strategy for 2030”.

Despite its unrivaled promise to help farming deal with its own emissions, add much-needed resilience to fields and landscapes, and provide additional revenue streams to farmers, agroforestry is simply missing in Commission recommendations to 16 Member States (Table 1).

Table 1 - Mentions of agroforestry or silvopastoral systems in CAP Strategic Plan recommendations sent by the Commission to Member States in December 2020. AF is referred to, on average, once every 30 pages.

AT	BE	BG	HR	CY	CZ	DK	EE	FI	FR	DE	GR	HU	IR	IT	LV	LT	LU	MT	NL	PL	PT	RO	SK	SI	ES	SE	
0	0	0	0	2	1	0	0	0	4	1	6	0	1	2	0	0	0	0	0	1	6	1	0	0	2	0	27

These omissions are profoundly disappointing considering previous Commission commitments:

- The headline commitment in the European Green Deal that “...the Commission will ensure that Strategic Plans are assessed against robust climate and environmental criteria. These plans should lead to the use of sustainable practices, such as precision agriculture, organic farming, agroecology, **agroforestry** and stricter animal welfare standards”.
- The promise in the Farm to Fork Strategy that “... the new ‘eco-schemes’ will offer a major stream of funding to boost sustainable practices, such as precision agriculture, agroecology (including organic farming), carbon farming and **agroforestry**”.
- The statement in the Biodiversity Strategy that “ ... the uptake of **agroforestry** support measures under rural development should be increased as it has great potential to provide multiple benefits for biodiversity, people and climate”.
- The inclusion of “**agroforestry**” in 15 amendments by the European Parliament in their final draft of the Strategic Plan Regulation.

Why has the Commission ignored its own strategies, and the intention of Parliament, and failed to remind most (let alone all!) Member States of the need to boost agro-ecological innovations such as agroforestry in an age of ever more rapidly changing climates?

Does the Commission intend to simply ignore its own strategies or will it more strongly recommend and monitor the inclusion of “sustainable practices, such as precision agriculture, organic farming, agro-ecology, agro-forestry and stricter animal welfare standards” in the CAP Structure Plans of Member States? If so, according to which criteria and using which methodologies? It is not too late too to correct these omissions. EURAF recommends that the Commission send a follow-up note to Member States outlining the need for the appropriate measures listed in Box 1: all designed to encourage farmers to add trees to their systems with a minimum of bureaucracy.

As a reminder of the importance of agroforestry to our common future and to farmers' bottom line, please consult our Agroforestry Policy Briefings (below)

<p>(1) Agroforestry & the Green Deal</p> <p>(2) Agroforestry & the EU Forest Strategy</p> <p>(3) Agroforestry & Direct Payments</p> <p>(4) Agroforestry & Enhanced Conditionality</p> <p>(5) Agroforestry & Ecoschemes</p>	<p>(6) Agroforestry & Pillar II</p> <p>(7) Agroforestry & Monitoring of CAP Strategic Plans</p> <p>(8) Agroforestry & Carbon Farming</p> <p>(9) Eligibility of Agroforestry for Basic Payments in England</p> <p>(10) EURAF reacts to the Commission's advice on CAP SPs</p>
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1. The existing definition of agroforestry (AF) in the Rural Development Regulation (*“a land use system in which trees are grown in combination with agriculture on the same land”*) should not be changed, but should be clarified to make clear that trees can be inside parcels or on parcel-boundaries.
2. Eight possible agroforestry IACS/LPIS codes are suggested as part of the “EFA Layer” of the IACS/LPIS - related to Areas of Ecological Interest (i.e. GAEC-9).
3. The IACS/LPIS codes for “Landscape Features” include individual trees, lines of trees and groups of trees. Powerful earth observation tools exist to identify these, and all MS should ensure that they are fully mapped in their LPIS system by 2023. They should count towards GAEC-9 and be fully eligible for Basic Payments.
4. The role of Trees outside the Forest should be explicitly recognised in the new Forest Strategy, and “agroforestation” should match existing planned “afforestation” at around 300,000 trees per year.
5. MS should implement the Commission’s [Working Paper](#) on direct payments: which says that Member States have the leeway to ensure agricultural area under agroforestry is *“fully eligible for Basic Payments when justified based on the local specificities (e.g. density/species/size of the trees and pedo-climatic conditions) and the value added of the presence of trees to ensure sustainable agricultural use of the land”*.
6. MS should recognise the potential for agroforestry to contribute to all ten Good Agricultural and Environmental Conditions (GAEC), and mention agroforestry accordingly in their GAEC guidance rules to farmers.
7. Agroforestry within agricultural parcels (called “hectares of agroforestry” in the current CAP) should be included in GAEC-9 areas, irrespective of whether it has been assisted by current or previous Pillar II schemes. This should apply to agroforestry on cropland, grassland and permanent crop areas.
8. Proposals have been made for five Pillar I Agroforestry and Landscape Feature Ecoschemes, which can be undertaken on a sequential annual basis, including planning, establishment and maintenance of existing areas like dehesa, parkland, wood pasture.
9. MS should include Pillar II “Establishment, Regeneration or Renovation of Agroforestry Systems” (aka submeasure 8.2) in their Strategic Plans as the primary way to establish new agroforestry areas and to enhance existing agroforestry like dehesa and wood pasture.
10. MS should include Pillar II “Forest Grazing” as part of the “Forest Protective Infrastructure” (aka sub-measures 8.3 and 8.4) in their Strategic Plans.
11. MS should establish a Pillar II Agroforestry Agri-Environment-Climate Measure (aka submeasure 10.1). This could be included in a Carbon Farming Scheme, which would meet the costs of soil carbon baselining, and subsequent monitoring, reporting and verification.
12. CAP Result Indicator 17 should read “Afforested and Agroforested Land: area in the farm “Reference Area” which is supported for afforestation, reforestation and agroforestation”. This is important since agroforested land remains as agriculture and should be recorded separately from afforestation.
13. Result Indicator 29 - Preserving Landscape Features - is a vital indicator and its removal by the AgFish Council should be reversed.
14. Result Indicators should be reported on annually and should include interventions funded outside the CAP whose conditions are covered by the “EU State Aid to Agriculture and Forestry Guidelines”.
15. All MS give their definition of “forest land” in the LULUCF Regulation. Small patches of tree-cover (e.g. <0.5ha in many countries) are not “forest” but are “Other Wooded Land” or “Other Land With Tree Cover” - using FAO definitions. Net GHG emissions from these areas should legally be reported in national inventories to the UNFCCC within the “grassland” or “cropland” categories. They are best considered as a component of agroforestry.