

**Greening the Common Agricultural Policy**  
**A response from the Society of Biology to the Environment, Food and Rural Affairs Committee**

16 November 2011

### Summary

1. The first responsibility of those developing and delivering the Common Agricultural Policy should be "do no harm".
2. A definition of permanent pasture/grassland is required which would differentiate between high nature value permanent grasslands, which are seriously threatened, and low nature value but high agricultural value intensively managed and reseeded grasslands.
3. High nature value grasslands require a clear definition and specific protection within the Common Agricultural Policy, which is lacking in the current proposals.
4. The benefits of proposed measures depend crucially on how they are implemented. Measures more clearly targeted on environmental outcomes are likely to be more effective.
5. We support significant investment through the CAP into research on and dissemination of methods for sustainable intensification.
6. If pillar one includes effective greening measures, this will free up well-targeted agri-environment schemes and budgets to address specific regional and ecological priorities.
7. While intensive farms should certainly be required to provide environmental benefits in return for support by the European taxpayer, much more effort needs to be made to develop policy instruments which also protect the most environmentally valuable farmland from intensification or abandonment.
8. Specific support for high nature value farming would be a big improvement to the current proposals.
9. Approaches such as paying the full costs of management for land which would otherwise be abandoned should be explicitly encouraged.

### Introduction

Farming provides a great many benefits to society in addition to their essential role in food production. Without wishing in any way to minimise the importance of food production, we concentrate our response on these other benefits because of the focus on the enquiry on "greening".

### Will the proposal to green direct payments generate significant environmental benefits?

10. The proposal for a compulsory and substantial green requirement for farmers receiving pillar one direct payments sends a welcome signal of the fundamental importance of environmental sustainability to the long-term future of agriculture.
11. As currently drafted, however, the proposals are too loosely worded to ensure significant environmental benefits, and indeed have the potential to create significant environmental harm.
12. The first responsibility of those developing and delivering the Common Agricultural Policy should be "do no harm".
13. In particular, a definition of permanent pasture/grassland is required which would differentiate between high nature value permanent grasslands, which are seriously threatened, and low nature

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value but high agricultural value intensively managed and reseeded grasslands. These types of grassland provide very different benefits for society, and require different treatment under the CAP. Intensively managed temporary grassland provides high yields of valuable fodder for livestock, and is not threatened by abandonment. High nature value grasslands provide many other services which are valued by society but not by the market. Semi-natural grassland has greatly declined in area since 1945, with losses of around 90% in the UK's lowlands<sup>1</sup>.

14. High nature value grasslands, including flower rich hay meadows, wet meadows, and semi-natural wooded pastures, support a high proportion of Europe's agricultural biodiversity and generate significant ecosystem services including carbon storage, flood protection and cultural landscapes<sup>1</sup>. Other than livestock production, many ecosystem services are higher in semi-natural than in agriculturally improved grasslands, and this can be linked partially with the higher plant richness<sup>1</sup>. They are often marginally economic at best, and are under threat from abandonment or intensification. These environmentally and socially valuable grasslands require a clear definition and specific protection within the Common Agricultural Policy, which is lacking in the current proposals. Indeed, the current proposals seem to offer a perverse incentive for farmers to plough up such grasslands before the reference date of 2014. And the current definition of permanent grassland still allows member states to include annually reseeded or intensively fertilised grass in the permanent grassland category. This makes the greening mechanism completely meaningless for biodiversity and climate.
15. As we stated in an earlier response to the committee<sup>2</sup>, all types of farm should be given incentives to protect and create biodiversity features such as ponds, trees and hedgerows, appropriate to the area. This is a welcome element of the current Commission proposals.
16. It is not clear that the current proposal requiring rotation of arable crops will automatically generate environmental benefits proportional to their disruptive effects on some types of farm in some agroclimatic zones. The benefits of this and the other proposed measures depend crucially on how they are implemented. Measures more clearly targeted on environmental outcomes are likely to be more effective.

### **The impact of additional greening requirements on food production and the competitiveness of the agricultural industry**

17. While there will undoubtedly be pressures on the Commission to relax some of the proposed greening requirements on the grounds that they negatively impact food production and competitiveness, we believe that significant greening of the CAP is essential to allow Europe to meet its commitments on biodiversity, climate change, nitrate pollution, water quality etc.
18. Food production is clearly central to any agricultural policy. The future of farming requires significant improvements in environmental sustainability, and we support the concept of sustainable intensification which would allow competitive food production to coexist with green measures. We would support specific and significant investment through the CAP into research on and dissemination of methods for sustainable intensification.

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<sup>1</sup> UK National Ecosystem Assessment (2011) The UK National Ecosystem Assessment: Technical Report. UNEP-WCMC, Cambridge. Chapter 6: Seminal Grasslands <http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx>

<sup>2</sup> <http://www.publications.parliament.uk/pa/cm201011/cmselect/cmenvfru/writev/671/cap19.htm>

## Consistency of the greening proposals with the CAP simplification agenda

19. The CAP should be as simple as possible, but must recognise the need for measures which respect regional variations in geography, climate, culture etc. Extensive systems of livestock production help to create and maintain mosaic landscapes; such systems are characteristic of family farms in remote and mountainous regions and require continued support for the ecosystem services they provide. There are also opportunities to reduce the environmental impact of large-scale intensive systems of production and this should also be encouraged. Intensive large-scale farms with extensive ecological infrastructure such as hedges, streams and woodland can make a large contribution to ecological goals in areas largely devoted to very intensive agriculture. (Indeed, one can argue convincingly that intensive farming is essential to meet Europe's environmental requirements as well as producing food, since it spares less productive land to be managed extensively for environmental goods and services.)

## How greening pillar 1 can be made coherent with agri-environment schemes

20. Agri-environment schemes alone are insufficient, since they are voluntary and underfunded. If pillar one includes significant and effective greening measures, this will free up well-targeted agri-environment schemes and budgets to address specific regional and ecological priorities.

## Recommendations for improving the greening proposals

21. We agree with Zeijts et al.<sup>3</sup> that policy should differentiate between intensively and extensively managed farmland, and recognise that it is more efficient to protect existing high nature value farmland rather than to attempt to recreate high nature value from intensive farms.
22. The proposed greening measures are likely to have more beneficial environmental effects on intensive farming areas than on those which are more biodiverse<sup>2</sup>. While intensive farms should certainly be required to provide environmental benefits in return for support by the European taxpayer, much more effort needs to be made to develop policy instruments which also protect the most environmentally valuable farmland from intensification or abandonment.
23. We recommend targeting more of the greening budget towards agricultural land which is already managed in a manner which generates high biodiversity<sup>4</sup>. The concept of high nature value farming<sup>5</sup> is well developed within European policy, and member states are required to identify high nature value farmland. It is therefore very surprising that the commission's greening proposals do not mention high nature value farming. Specific support for high nature value farming would be a big improvement to the current proposals.
24. The Commission proposes to continue to pay farmers for environmental services on the basis of income foregone and additional costs. We believe that this formula, as currently applied by many member states, is inadequate to protect the most environmentally beneficial types of farming from abandonment or intensification. Alternative approaches such as paying the full costs of management for land which would otherwise be abandoned should be explicitly encouraged, and are allowed under

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<sup>3</sup> Zeijts, H. van, et al. (2011), *Greening the Common Agricultural Policy: impacts on farmland biodiversity on an EU scale*, The Hague: PBL Netherlands Environmental Assessment Agency.

<sup>4</sup> Kleijn, D., F. Kohler, A. Báldi, P. Batáry, E.D. Concepción, Y. Clough, M. Díaz, D. Gabriel, A. Holzschuh, E. Knop, A. Kovács, E.J.P. Marshall, T. Tschardtke & J. Verhulst (2009), 'On the relationship between farmland biodiversity and land-use intensity in Europe', *Proceedings of the Royal Society B: Biological Sciences* 276: 903-909.  
<http://rspb.royalsocietypublishing.org/content/276/1658/903.full>

<sup>5</sup> Beaufoy, G. (2008) *HNV farming: explaining the concept and interpreting EU and national policy commitments*. European Forum on Nature Conservation & Pastoralism <http://www.efncp.org/download/EFNCP-HNV-farming-concept.pdf>

current WTO rules<sup>6</sup>.

25. It seems perverse that the proposed scheme appears designed to pay more for the creation of new biodiversity features, agri-forestry schemes etc than for the protection of existing biodiverse farming practices and land-use types. This contradiction should be removed, or it risks encouraging farmers to destroy existing features and create new ones. An ancient wooded pasture, hedgerow, pond or flower rich hay meadow is more ecologically valuable than a new one.
26. We disagree in principle that farmers participating in the small farmers scheme should be exempted from cross compliance and the requirement to carry out agricultural practises beneficial for the climate and the environment. Small farms comprise a very significant proportion of agricultural land in some member states, and should also farm in a way that benefits the environment. But, unless the greening proposals are redrafted to deliver clearer environmental benefits, we do not think it necessary to burden small farmers with them.

#### **Other elements of the CAP proposals.**

27. The proposals should include more direct support for maintaining diverse farm animal and plant genetic resources, which themselves contribute to the genetic biodiversity of farmed land.

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<sup>6</sup> Barnes, A.P., Schwarz, G., Keenleyside, C., Thomson, S., Waterhouse, T, Polakova, J. and Stewart, S., McCracken, D., (2011). *Alternative payment approaches for non-economic farming systems delivering environmental public goods*. Final Report for Scottish Natural Heritage, Scottish Environment Protection Agency, Countryside Council for Wales and Northern Ireland Environment Agency, May 2011.

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This consultation response was developed through contributions from a task force comprising Fellows and member organisations<sup>7</sup>. We also appreciate the helpful comments of Guy Beaufoy, Gwyn Jones and David McCracken of the European Forum on Nature Conservation and Pastoralism.

We are pleased for this response to be publicly available and will place a version on [www.societyofbiology.org](http://www.societyofbiology.org) with permission from the select committee. For any queries, please contact Dr Barbara Knowles, Society of Biology via [barbaraknowles@societyofbiology.org](mailto:barbaraknowles@societyofbiology.org)

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<sup>7</sup> <http://www.societyofbiology.org/aboutus/committees/etp-home/cap-taskforce>

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